

UNITED STATES DEPARTMENT OF AGRICULTURE

NATIONAL ORGANIC PROGRAM

NATIONAL ORGANIC STANDARDS BOARD (NOSB)

SPRING 2024

PUBLIC COMMENT WEBINAR

Tuesday,

April 23, 2024

11:00 a.m., EST

Day 1

National Organic Standards Board (NOSB) Members

Kyla Smith, NOSB Chair

Amy Bruch, NOSB Vice Chair (Virtual)

Nate Lewis, NOSB Secretary

Nate Powell-Palm

Mindee Jeffery

Brian Caldwell

Jerry D'Amore

Carolyn Dimitri

Kim Huseman

Allison Johnson

Dilip Nandwani

Logan Petrey (Virtual)

Franklin Quarcoo

Wood Turner

Javier Zamora (absent)

USDA/National Organic Program Staff

Jared Clark, Acting Assistant Director, and

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

Michelle Arsenault, Advisory Committee Specialist

P R O C E E D I N G S

(Time: 11:01 a.m.)

1
2
3 MS. ARSENAULT: Welcome, folks. I'm Michelle
4 Arsenault. I work for the National Organic Program and I'm the
5 Advisory Committee Specialist for the National Organic
6 Standards Board, the NOSB. I am officially calling the Board
7 meeting to order today. And I will note that I am about to
8 start recording.

9 AUTOMATED VOICE: Recording now in progress.

10 MS. ARSENAULT: So we are now recording the Zoom
11 meeting.

12 Thanks for joining in the public comment webinars.
13 We have two comment webinars scheduled this week, today and
14 Thursday, and we'll continue with the official Board meeting
15 next week in person in Milwaukee. You will also be able to
16 watch the meeting in Zoom, if you're not with us in Milwaukee.

17 So if you're online with us, you should be able to
18 see an instruction slide. If you're on the phone only, I'm
19 going to summarize it briefly for those who are just listening
20 in.

21 Attendees are going to be on mute and unable to
22 unmute their phones, and that's to prevent Zoom bombers, which
23 we've had once or twice. The chat is enabled at the center of
24 the Zoom task bar. It may be in different places for you and
25 you may have to hover over the Zoom window to find it. So you

1 can chat with each other or relay technical difficulties to the
2 NOP, but chats aren't part of the public record and they're not
3 a public comment, and Board members won't be answering
4 questions that come in via the chat.

5 The closed captioning is available in Zoom. If you
6 click the live transcript button or the closed caption CC
7 button in your Zoom taskbar, you can control your own view.
8 You can turn the close captioning on or off, and change the
9 font size, and all that.

10 There may be some fancy features under there now with
11 different languages. I haven't had a chance to play with that,
12 yet. So if you guys want to play around with that, they may be
13 in there.

14 Please don't use the raise hand feature. All
15 registered commenters will be called on in turn by the Board
16 chair.

17 You can also customize your own view in Zoom. You
18 can rearrange what you see on your personal screen by going to
19 the upper right corner in the view button, and toggling between
20 gallery view/speaker view.

21 You can also, when we share slides, which we have a
22 few sets today and Thursday, go to exit full screen and it will
23 not take over your entire screen when we share a PowerPoint
24 presentation. And no worries, it won't change it for anyone
25 else except you, so you're not changing the entire meeting for

1 everyone.

2 If you're having technical problems, please visit
3 support.zoom.us, and I believe Andrea just put that into the
4 chat for you. And if you sometimes just log off of the Zoom
5 and log back in, that usually fixes your problems.

6 The webinar is being recorded, as I noted, and a
7 transcript will be posted on the NOP website as soon as the
8 entire meeting is over after next week.

9 All right. Speakers, please make sure that the name
10 displayed in your video tile is correct so we can locate you
11 when it's your turn to speak. You should be able to rename
12 yourselves by clicking the participant list. Then next to your
13 name, you should see a more button, it might be three dots.

14 Do keep an eye on the chat box. If we can't find you
15 in the list of participants, we may send a note to identify
16 yourself. Sometimes when you dial in on the phone, the phone
17 doesn't connect you to a name. So if I don't have your phone
18 number, then we can't find you.

19 We will ask you to unmute when you are called upon to
20 speak. So you may get an on-screen message that said the host
21 asks you to unmute yourself. And then you can unmute yourself
22 and turn your camera on, which is optional. You don't have to
23 be on camera, if you don't want to be. Both the mike and
24 camera are on the left side of the Zoom taskbar and also next
25 to your name in the participant list next to the -- or under

1 the ellipsis, the three dots.

2 If you're on the phone only and you don't have a mute
3 button, you may have to tap star-6. And star-6 will toggle
4 mute/unmute. So you have that functionality.

5 Please state your name and affiliation for the record
6 at the start of your comments. And just a reminder, each
7 commenter will have three minutes to speak. We'll use a timer
8 that will sound. I'm going to test the timer before we get
9 started here. The timer will sound when your time is up. And
10 when you hear the beep, if you could please finish your
11 sentence. The timer is going to be visible in my video tile,
12 which we're going to pin to the screen for everybody. So you
13 can change your view, but that would probably never go away,
14 should never go away.

15 At the end of your comment, the NOSB chair is going
16 to invite NOSB members to ask any questions. So don't run away
17 as soon as you're done talking. There may be questions for
18 you.

19 Now I am going to turn the mike over to Jared Clark,
20 the National List Manager and currently the Acting Assistant
21 Director of the Standards Division, to give us some welcoming
22 remarks. Jared?

23 MR. CLARK: Yeah, thank you, Michelle. Hello,
24 everyone. Like Michelle said, I'm Jared Clark, the Acting
25 Assistant Director of the Standards Division in the National

1 Organic Program. We continue to be grateful for our ability to
2 engage in these virtual sessions, which allow for people to
3 participate from wherever they are.

4 To our public commenters, thank you again for
5 engaging in this process to shape policy. It's always exciting
6 to see democracy in action. And I also thank our audience, you
7 continue to be an important part of this public meeting
8 process.

9 This meeting, like other meetings of the National
10 Organic Standards Board, will be run based on the Federal
11 Advisory Committee Act and the Board's policy and procedures
12 manual. Kyla Smith, our Board chair, will facilitate this
13 session.

14 We remind everyone it is an open transparent process,
15 so we do ask everyone to be respectful of each other and avoid
16 personal attacks. This extends also to the chat messages.
17 Even if you disagree with the speaker's position, please be
18 sure to provide them the same respect and grace you would want
19 for yourself.

20 To close, I thank the NOP team and acknowledge all
21 their hard work: Michelle Arsenault, Andrea Holm, Johanna
22 Mirenda, Heather Kumar, and Esu Obu. I continue to be
23 impressed by this team and grateful to work with them every
24 day. Let's give this whole group a big Zoom round of applause.
25 Thank you.

1 I will now hand the mike back to Michelle Arsenault,
2 who will do a roll call of Board members. Thank you.

3 MS. ARSENAULT: Thank you, Jared. All right. Kyla
4 Smith?

5 CHAIR SMITH: I'm here. Good morning.

6 MS. ARSENAULT: Excellent. Camera and mike working.
7 Amy Bruch?

8 VICE CHAIR BRUCH: Good morning, everybody.

9 MS. ARSENAULT: Good morning, Amy. Nate Lewis? Nate
10 is joining us by phone. Maybe we haven't unmuted.

11 UNIDENTIFIED SPEAKER: He needs to be promoted,
12 Michelle.

13 SECRETARY LEWIS: I'm here. Can you hear me now?

14 MS. ARSENAULT: We can hear you. Thanks, Nate.
15 Brian Caldwell?

16 BOARD MEMBER CALDWELL: Good morning.

17 MS. ARSENAULT: Good morning, Brian. Jerry D'Amore?

18 BOARD MEMBER D'AMORE: Good morning, as well.

19 MS. ARSENAULT: Good morning, Brian -- Jerry, sorry.
20 Carolyn Dimitri is going to be joining us in about an hour. She
21 had a conflict at this time, so I'll keep an eye out for
22 Carolyn to join. Kim Huseman?

23 BOARD MEMBER HUSEMAN: Here.

24 MS. ARSENAULT: Good morning, Kim. Mindee Jeffrey?

25 BOARD MEMBER JEFFREY: Good morning.

1 MS. ARSENAULT: Good morning, Mindee. Allison
2 Johnson?

3 BOARD MEMBER JEFFREY: Good morning.

4 MS. ARSENAULT: Good morning. Dilip Nandwani?

5 BOARD MEMBER NANDWANI: Good morning.

6 MS. ARSENAULT: Yay, your speaker is working, Dilip.
7 Thank you.

8 BOARD MEMBER NANDWANI: Good.

9 MS. ARSENAULT: Logan Petrey?

10 BOARD MEMBER PETREY: Good morning.

11 MS. ARSENAULT: Good morning, Logan. Nate
12 Powell-Palm?

13 BOARD MEMBER POWELL-PALM: Good morning.

14 MS. ARSENAULT: Good morning, Nate. Franklin
15 Quarcoo? Franklin? There you are.

16 BOARD MEMBER QUARCOO: Good morning.

17 MS. ARSENAULT: Good morning. Wood Turner?

18 BOARD MEMBER TURNER: Good morning.

19 MS. ARSENAULT: Good morning, Wood. And Javier
20 Zamora? All right, I note Javier is absent.

21 And Jared already introduced the NOP staff that are
22 on the call with us. We have a whole team supporting us on the
23 call. Andrea and Jared will be sharing slide decks, for the
24 people that have slide decks so you know who to -- who to ask
25 to advance your slides for.

1 All right. I'm going to hand the mike off now to
2 Kyla Smith, the Chair of the National Organic Standards Board
3 for opening remarks. Kyla?

4 CHAIR SMITH: Thanks, Michelle. Good morning and
5 happy Earth month to you all. I was reflecting yesterday on
6 Earth Day of how grateful I am to be a part of the organic
7 community. I am so appreciative of each and every one of you
8 for the positive impact you all have on our home, Planet Earth,
9 whether that's through producing organic food, or through the
10 organic certification process, or through advocacy, or
11 oversight and enforcement, or even just showing up here today
12 to engage and give public comments.

13 Though I know we might not always agree, however, for
14 better or worse we are all connected with one another through
15 our involvement in this community. And engaging with one
16 another in this way allows us to keep the organic market
17 thriving and Mother Earth healthy. I couldn't be more proud to
18 be included amongst your ranks and I look forward to hearing
19 all of the comments and questions from the Board members.

20 With that, I will run through some quick reminders.
21 And then we will get started, as we have a full slate of
22 commenters. I think there is a slide? Yes. So just a
23 reminder that there is a policy in our policies and procedures
24 manual about public comments. All speakers will be
25 recognized -- all speakers who have -- all speakers who -- all

1 speakers -- this is worded weirdly, sorry.

2 All speakers will be recognized who have signed up
3 during the registration period. Persons must give their names
4 and affiliations for the record at the beginning of their
5 public comment. Proxy speakers are not permitted. Individuals
6 providing public comment shall refrain from making any personal
7 attacks or remarks that might malign the character of the -- of
8 any individual.

9 Members of the public are asked to define clearly and
10 succinctly the issues that they wish to present before the
11 Board. This will give NOSB members a comprehensible
12 understanding of the speaker's concerns.

13 I will call on speakers in the order of the schedule
14 and will announce the next person or two so that they can
15 prepare. Please remember to state your name and affiliation,
16 and then we will start the timer. I don't, after I'm done,
17 Michelle, I don't know if you wanted to test the timer. But
18 Board members will then indicate to me if they have any
19 questions and I will call on them. Only NOSB members are
20 allowed to ask questions. And then, Michelle, did you want to
21 test out the timer?

22 MS. ARSENAULT: I do, indeed. I think you guys can
23 see my tile. It's pointed towards the speaker. And countdown
24 from five seconds.

25 CHAIR SMITH: That's a little quiet.

1 MS. ARSENAULT: Yeah, we've been having trouble with
2 the mike. So it will be on screen. The lights are kind of
3 bright. You'll see it light up and you'll be able to see the
4 countdown timer on screen. So hopefully that'll be enough of a
5 flag to, without the obnoxious beep, which on my end it's
6 really loud by the way.

7 CHAIR SMITH: Okay. Well, if it doesn't work, then
8 I'm just going to go "eh" -- just kidding.

9 MS. ARSENAULT: Thanks, Kyla.

10 CHAIR SMITH: Okay. So we have Ellie Hudson up
11 first. And then we have Matthw Fitzgerald and Liz Bell coming
12 up next after Ellie. So, Ellie, are you ready?

13 MS. HUDSON: I'm ready.

14 CHAIR SMITH: Okay, great.

15 MS. HUDSON: All right. Ellie Hudson, Accredited
16 Certifiers Association or ACA, Executive Director. We are a
17 nonprofit educational organization. And our mission is to
18 ensure consistent interpretation of USDA organic regulations
19 through collaboration and education of accredited certification
20 agencies.

21 Our membership includes 64 certification agencies
22 that are accredited by the USDA, including yours, of course,
23 Kyla. And an ever-growing community of non-certifier associate
24 members, member companies that support ACA's mission.

25 Thank you for the opportunity to provide comments to

1 the NOSB and the National Organic Program. In addition to the
2 written comments previously submitted and on behalf of these
3 members, we are pleased to offer comment on the following
4 topics: certifier working environment, market development, and
5 online comments.

6 ACA is coming out of our season of in-person and
7 online conferences for certifiers, which happen annually
8 between January and April. One theme that emerged repeatedly
9 in the dialogue at these events was stress and fatigue around
10 the continued intense pressure in certifier working
11 environments, with ever-increasing complexity and additional
12 steps required to carry out the work of certification.

13 ACA and our members are fully committed to organic
14 integrity as a regulatory instrument and to the movement of
15 organic. A serious human capital shortage and changes brought
16 out by the strengthening organic enforcement final rule
17 continue to place the most pressure on certifiers. Working in
18 an environment under this level of pressure is not sustainable.

19 ACA is committed to being a voice in partnership with
20 the Board and the National Organic Program to seek and find
21 areas for addition by subtraction toward capacity building and
22 protecting organic integrity. ACA will continue our work on
23 identifying ways to move further toward a risk-based
24 certification system. We envision a system that reduces
25 recordkeeping burdens and redundancies, eliminates or reduces

1 unnecessary barriers to certification, and enables organic to
2 more effectively reach marginalized communities.

3 Market development. In reviewing the two realms of
4 the Board for the organic market developing brands, ACA was
5 pleased to see funding for various regional efforts to educate
6 consumers. We need to grow this effort at a national level as
7 we continue to fall short of a cohesive and consistent
8 educational effort to tell the great story of organic. Should
9 the Board take up this topic in the future, ACA will commit to
10 partnering within that effort.

11 Finally, ACA thanks the Board and the NOP for the
12 opportunity to offer these comments online. We see the ease of
13 decorum, efficiency, and the ability to participate without
14 having to travel as excellent benefits. If a web-based oral
15 comment option is available, ACA will participate this way for
16 the foreseeable future. Thank you, again. See you next week.

17 CHAIR SMITH: Thanks, Ellie. Go ahead, Amy.

18 VICE CHAIR BRUCH: Yeah. Ellie, welcome. Thank you
19 so much for kicking us off here and thanks for all the work
20 that you and others are doing to, to get SOE off the ground and
21 fully implemented. Really appreciate it. I know it's a busy,
22 busy time. Quick question. You mentioned that there are 64
23 certifying groups or members of ACA. What percentage of all
24 the accredited certifiers does that represent? Are there some
25 additional ones that aren't members?

1 MS. HUDSON: It is 96 percent are U.S. based
2 certifiers and 10 total in the world that are not members. So
3 there's 74 accredited certifying agencies right now and in
4 touch with mostly through Biofach, a lot of the non-members
5 that are outside of the U.S. And I think many of them just
6 weren't aware of ACA's benefits, so we're working on bringing
7 them into the tent.

8 VICE CHAIR BRUCH: Excellent, thank you. And just to
9 follow-up with that, with SOE being implemented, there's more
10 defined procedures about grower groups. And with the internal
11 controls person within a grower group, is their future outreach
12 to try to get them involved with some of the benefits of ACA so
13 they can fully execute a, a system with integrity?

14 MS. HUDSON: Thanks, yeah. I think this is on our
15 radar. We have -- we're looking at some potentially working on
16 a gap analysis as a starting point within producer groups and
17 how it's impacted on SOE. And I will also say that Kyla is
18 often in these conversations when we talk about producer
19 groups. So that's been a really helpful tie-in to the NOSB, as
20 well.

21 VICE CHAIR BRUCH: Thank you, Ellie, appreciate it.

22 MS. HUDSON: I mean I should say kind of looking at
23 maybe some of the differences and similarities with the EU
24 regulation and USC organic.

25 CHAIR SMITH: Any other questions for Ellie? If not,

1 I have one. I just -- I saw in ACA's public comments a request
2 to -- because of the business within the certification
3 community as you pointed out, a request to pull back the TR
4 template back to subcommittee so that ACA could provide
5 additional comments leading up to the fall. And I wondered if
6 you could maybe speak a little bit more about that?

7 MS. HUDSON: I think Marni Karlin from my -- my
8 colleague Marni is in a better position to speak on this
9 particular issue and she's got comments coming up on Thursday.
10 So I'll just defer.

11 CHAIR SMITH: Thanks, Ellie. Oh, you're not off the
12 hot tee, yet. Amy's back. Go ahead, Amy.

13 VICE CHAIR BRUCH: Yes. Kyla, you reminded me of one
14 thing, thank you. And kind of in connection with Kyla's
15 comment, just a macro question for you, Ellie. There was a lot
16 of comments about, you know, pulling documents maybe back and
17 waiting just because of the busy time, because I know there
18 wasn't full, full execution with, with comments. But I was
19 wondering was the open docket something we could leverage when
20 it is available, so we can kind of keep the momentum going and,
21 and still deliver some new material for the next semester, if
22 we kind of leverage that open docket in the interim?

23 MS. HUDSON: I think that's a great idea.

24 VICE CHAIR BRUCH: Okay, excellent. We'll try to get
25 that going as quickly as we can on our end. There's a lot of

1 steps involved. But on our end, we'll try to do our best.

2 Thank you.

3 CHAIR SMITH: Thanks, Ellie.

4 MS. HUDSON: You're welcome. My pleasure, enjoy.

5 CHAIR SMITH: Okay. Up next we have Matthew
6 Fitzgerald. Maybe we couldn't find Matthew? Matthew, if
7 you're there, if you can request to be unmuted or maybe put
8 something in the chat to signify that you're there? Otherwise,
9 we will go next to Liz Bell and we can circle back around to
10 Matthew in a bit.

11 Okay. So we have Liz Bell coming up next. Then we
12 have Scott Myers and then Grant Marcuccio. Again, I'm going to
13 probably get some names wrong, so grace is appreciated. So,
14 Liz, if you are ready? Don't forget to state your name and
15 affiliation.

16 MS. BELL: I'm Liz Bell and I represent CROPP
17 Cooperative/Organic Valley. Good morning. Thank you to the
18 NOP and the Board for giving me this opportunity today to
19 provide comments on behalf of our co-op. I work to advocate
20 for and consult our 1,600 farmer member owners on their
21 certification matters. I also lead our farm research hub that
22 helps to connect our farmers and their needs with research
23 partners.

24 Organic Valley believes that holistic animal care is
25 essential in organic livestock systems. We applaud the efforts

1 to continuously improve animal care management techniques and
2 treatments that alleviate animal pain. I'd like to announce
3 that Organic Valley in partnership with Stonyfield
4 Organization, Horizon Organic, and Aurora Organic Dairy
5 petitioned to add meloxicam to 205.603 of the National List.
6 The petition is listed on the NOP petition substances index
7 website.

8 Meloxicam would be used by organic livestock
9 producers for improved pain management and overall animal
10 welfare. We are hopeful that with the addition of meloxicam to
11 the National List, along with the new organic livestock and
12 poultry standards rulemaking, they will be more and more
13 regarded that organic is animal welfare. There will be several
14 others giving oral comments this week and next on meloxicam,
15 including a few veterinarians that can provide technical
16 expertise and better answers to your questions.

17 Regarding sunset inputs, I would like to call out our
18 support to relist DL-Methionine on the National List. This is
19 an essential feed additive for organic poultry producers. We
20 support additional research in this field to, to encourage more
21 commercially available alternatives and believe this research
22 priority should be at the top of the list. Our producers do
23 not feel the current restriction is an issue. And we believe
24 this aligns with the organic philosophy.

25 Once again, we celebrate the origin of life

1 rulemaking and have seen firsthand the impacts of that with the
2 numerous conventional dairy farmers now transitioning to
3 organic these days, many joining the Organic Valley co-op.

4 Regarding SOE implementation, there have been some
5 sticking points we recognized in these early days for our
6 producers specifically. First, I imagine it's no surprise that
7 there are several previously exempt operations that are
8 learning just now that they need to be certified.

9 Firstly, I can say the least for our certifiers, I
10 recognize they are working diligently to get these operations
11 certified as quickly as possible. I hope to encourage there be
12 grace given to these farms that work with such operations and
13 their supply chain as they play catch-up on this requirement.

14 Secondly, it seems that the intent of the nonretail
15 labeling requirement was meant for the movement of organic
16 goods being shipped or stored, not for organic products
17 received or produced on-farm and stored there for use. It's
18 been unclear and inconsistent how certifiers are handling this
19 for producers. It's a hinderance to organic farmers to add a
20 sign on their outdoor concrete silo, pit wall, or adhere a
21 sticker on their milk tank, especially for those solely
22 producing organics.

23 CHAIR SMITH: You can finish your sentence.

24 MS. BELL: It truly does not feel sound and sensible
25 or a risk-based approach to require this in scenarios in the

1 organic system. I welcome further clarity. Thank you.

2 CHAIR SMITH: Thanks, Liz. Questions for Liz? I
3 don't have a question, but I will just say that ACA is fully
4 aware of the nonretail container labeling discrepancies and I
5 believe we'll be engaging in a working group soonish, shortly,
6 so hopefully that will provide some consistency of
7 interpretation.

8 MS. BELL: Thank you.

9 CHAIR SMITH: Thanks. Okay. Next up we have Scott
10 Myers. And then after Scott, we have Grant Marcuccio and then
11 Ramy Colfer. Scott, don't forget to say your name and
12 affiliation, and then you can get started.

13 MR. MYERS: Sure. All right, my name is Scott Myers.
14 I'm with Woodlyn Acres Farm in Dalton, Ohio. And I'd like to
15 start by thanking all the members of the Board for your
16 dedicated service to the organic community and also for the
17 opportunity to speak today. The option to comment virtually
18 works very well with my farm's busy schedule. Hence, me
19 commenting from the tractor today.

20 I certify my farm with OFA and the Real Organic
21 Project. I also serve as the policy committee chair with the
22 Organic Farmers Association, and participate in both OFA and
23 OFA's profit-sharing workgroups. My farm is a fourth
24 generation family farm raising organic grains and hay, over
25 2,500 acres in northeastern Ohio, and this will be our eighth

1 year certified organic.

2 I'd like to start with the issue of residue testing
3 in imported organic products. Imports have drastically reduced
4 the price I receive on my farm for my soybeans, sunflowers, and
5 corn. In fact, due to the huge increase in organic sunflower
6 imports over the past year, we are no longer able to profitably
7 raise them on our farm as the offered contract price is 50
8 percent what it was 2 years ago. This has turned what was once
9 a very promising rotation crop for us into one that we and many
10 other organic farmers no longer plant.

11 It is hard to say if these imported grains are truly
12 organic. Yes, they may have paperwork in order. But I see no
13 reason why these grains should not be tested for prohibited
14 substances before being allowed to enter the U.S. marketing
15 channels. Our domestic organic crops are regularly tested for
16 prohibited substances, as well as GMO content. And this is all
17 done voluntarily. One of our corn buyers tests every load they
18 receive for GMO content.

19 Let's level the playing field for domestic organic
20 producers and maintain the integrity of USDA organic labelling
21 by testing all imported grains and rejecting them when they are
22 found to have prohibited substances in them.

23 Lastly, I would like to speak about crop insurance
24 related to organic farming. Many of you have heard me talk
25 about crop insurance before. It's something I have become very

1 passionate about reforming so that it works better for organic
2 farmers. Part of my passion comes from the fact that our farm
3 carried crop insurance for 28 years while farming
4 conventionally. And it saved our farm from disasters multiple
5 times over that period.

6 When I switched to farming organically eight years
7 ago, I was shocked that the same crop insurance products I was
8 using conventionally no longer provided the same protections to
9 my farm due to different ways organic crop prices and yield
10 were utilized. Making things even more difficult is the long,
11 diverse organic rotation they are utilizing.

12 On many of our farms, which are called units in crop
13 insurance, we may only raise organic for one year out of every
14 five to seven years. A farmer needs five years of actual yield
15 data from each farm unit to get rid of those T-yields and be
16 allowed to use their actual production history. This could
17 take 25 to 35 years on our diverse organic farm, making the
18 insurance product almost useless except for extreme disasters.

19 I would refer you to the Organic Farmers
20 Association's written comments for specifics on ideas and
21 solutions that our crop insurance workgroups have come up with.
22 At this time, I'd be happy to discuss any of these issues
23 further with you, if I can be of any help. Thank you for your
24 time and service to the organic community.

25 CHAIR SMITH: Thanks so much, Scott. It looks like

1 we have a question from Brian and then Amy. So go ahead,
2 Brian.

3 BOARD MEMBER CALDWELL: Scott, thanks so much for
4 your comments. We love to hear from farmers directly. I am
5 just -- I've been struggling for, for quite some time trying to
6 figure out why there isn't more organic grain production, field
7 crop production domestic in the U.S. And I'm just wondering
8 what you see the, the biggest barriers to, to increasing that
9 are. And I'm wondering if they are financial and financial
10 insecurity or if there is other barriers that you think are
11 more important.

12 MR. MYERS: That's a good question. Actually, I
13 think there's a couple of issues. The financial thing might be
14 one of them. And I've experienced this here more recently.
15 MEA, the bank that we get our -- that we finance through on our
16 operating load, they -- because they don't have a lot of data
17 on organic farms out there they -- we, we actually have to pay
18 more in interest because we're a higher-risk farm than what
19 a -- than we were when we were conventional. So it costs us
20 more in that respect. So that's one.

21 And I think another is just the fact that it's easy,
22 conventional farming. It's what, you know, what's done. And
23 some of these guys, they, they like to plant and go to
24 some -- the joke was always plant, go to Florida, and then
25 harvest. So it, it takes more effort. But I think it's -- and

1 another is education. We're fortunate where we're at. I have
2 a lot of organic farming neighbors, so I don't even have to
3 leave buffers and people are amazed at that.

4 And we have -- we're very fortunate to have a lot of
5 mentors, not paid mentors, just a farming community that I know
6 if I have a problem or somebody else has a problem, I can call
7 at any point in time. So it's, it's really neat to have that
8 here in our part of Ohio. So, and that kind of has grown. As,
9 as we became organic, as a larger grain farmer, now more and
10 more people that see that we can do it successfully have also
11 decided to transition.

12 BOARD MEMBER CALDWELL: Okay. Thank you so much.

13 CHAIR SMITH: Amy, you put your hand down. Did you
14 have a question?

15 VICE CHAIR BRUCH: Yeah, I did. I think -- yeah,
16 yep, I do. Scott, thank you for joining us. Love the window
17 office that you're calling in from on your tractor. Really
18 appreciate it. You touched on a lot of topics that are really
19 important to farmers across the Midwest and across I think the
20 country, both markets, imports, crop insurance. And, and I
21 really apologize that you have to talk about these topics.
22 Hopefully, we'll find some headway to get some resolution here.

23 But you mentioned and you quantified the impact of
24 the pricing on sunflowers and that they are cost-prohibitive
25 now to grow. And that's, that's unfortunate, because it's a

1 good rotational crop when you're talking, you know, building
2 soil health. We need other things besides corn and soybeans.
3 But could you talk about some of the other crops that you grow
4 and the decrease in the price that you've seen over the last
5 couple of years?

6 MR. MYERS: Sure. Yeah, obviously, we talked about
7 sunflowers. Soybeans, and soybeans have obviously, you know,
8 are pricing half what they were a few years ago. But I also
9 don't feel that \$40 a bushel was ever sustainable in the
10 organic markets and should have been there. But, yeah,
11 they've, they've come down substantially.

12 Corn, you know, we were, you know, we feel that
13 \$11.50, \$12 a bushel is a very sustainable number for corn, for
14 both the, the buyer and the seller, for livestock also. And
15 we're down around \$7, \$7 to \$8 a bushel now. We're very
16 fortunate where we live in this part that we're not as far from
17 the buyers as people like in Iowa are, so we get paid higher
18 prices because we don't have to ship it as far. But that is
19 another one we've seen.

20 Wheat is another one. In fact, we've switched to
21 growing mostly hard red winter wheat for specialty markets,
22 because those offer, you know, contracted prices that we know
23 what we're going to get paid. The soft red winter wheat price
24 crashed last year. In fact, there was nowhere to go with our
25 wheat. I still have one load in the bin that I'm hoping to get

1 rid of. But, yeah, so that's been a -- it's been a real issue.

2 And, and that's one thing that's keeping farmers away
3 from transitioning, not just transitioning or if they decide to
4 get into the, like the top program or something like that. I
5 feel we're -- I'm worried we're setting farmers up to fail if
6 we can't keep these prices at least reasonable for them.

7 VICE CHAIR BRUCH: Thank you for, for commenting on
8 that. There was a written comment that said organic corn costs
9 about 30 percent more to grow organically than conventionally.
10 Would you think your range is similar to that or just in cost
11 of production?

12 MR. MYERS: And we're probably not that high partly
13 because we have, once again, like we have the markets. We also
14 have access to manure next door to us. In most cases, we pay
15 much less than most people do. So in some cases compared to my
16 conventional neighbors when I -- like last year, on corn we
17 were maybe I would say 20 percent higher. On soybeans, we were
18 actually the same or lower in some cases on our soybean cost of
19 production than conventional neighbors, due to their chemical
20 costs increasing especially.

21 VICE CHAIR BRUCH: Mm-hmm. Okay. Thank you, Scott.
22 Appreciate your comments.

23 MR. MYERS: Yep, thank you.

24 CHAIR SMITH: I think Kim had a question for you,
25 Scott.

1 MR. MYERS: Okay.

2 BOARD MEMBER HUSEMAN: Hey, Scott. I also want to
3 thank you for your home office there joining us today. My
4 question is around logistics and your market outlets. Can you
5 talk about I know you mentioned the fortunate space that you're
6 in having maybe some of those close by. But can you speak a
7 little bit to maybe the challenges from a fragmented logistics
8 aspect or your buyer potentials?

9 MR. MYERS: Sure. And, yeah, like I said, we're very
10 fortunate that, you know, most of our corn goes to the eastern
11 East Coast, so we're not that far, Eastern Pennsylvania, to
12 those markets. In fact, a lot of ours now is staying local.
13 We've actually one of the local egg buyers or egg, you know,
14 they raise eggs and they put in their own feed and all. But I
15 do see that as a real issue.

16 I've talked to friends that are out in Illinois,
17 Indiana that they even have trouble finding trucking sometimes
18 or getting reasonable trucking costs. We've actually went to
19 hauling our own grain in some cases. We've had to go through
20 the whole situation of being DOT certified and everything so we
21 can haul our wheat to New York, because we couldn't find
22 reasonable trucking to get our wheat there. And we're doing it
23 for half of what they were going to charge. So that helped
24 open up a market, as well, in that respect.

25 BOARD MEMBER HUSEMAN: Thanks, Scott.

1 MR. MYERS: Thank you.

2 CHAIR SMITH: Thanks so much for your time today,
3 Scott.

4 MR. MYERS: Yep. Thank you, guys, as well.

5 CHAIR SMITH: I'm just going to circle back around to
6 see if we have Matthew Fitzgerald. He -- we were running ahead
7 of schedule and so it might have been that he wasn't on yet.
8 Matthew, if you are out there?

9 MS. ARSENAULT: I'm not seeing Matthew on the line.
10 There are two commenters on the line that -- we don't have
11 Matt's phone number, so I can't tell if one of them is him or
12 not.

13 CHAIR SMITH: Okay. What about Grant Marcuccio?

14 MS. ARSENAULT: I'm also not seeing Grant with us.

15 CHAIR SMITH: Okay. So then next up would be Ramy
16 Colfer. After Ramy, it's Michael Deakin and then Seth Croeck.

17 MR. COLFER: Good morning. Can you guys hear me?

18 CHAIR SMITH: Yep, go ahead.

19 MR. COLFER: Okay. Good morning. My name is Ramy
20 Colfer representing True Organic Products. True Organic
21 Products is a U.S. leader in organic fertilizer and millionths
22 manufacturing used by many organic growers and home gardeners.
23 Our mission is to make organics work for a better world.

24 As an organic input supplier and manufacturer, we
25 understand we are part of the food chain. And we know that

1 organic inputs make contact with the edible portion of the
2 crop. True Organics is the only ISO-2200 accredited organic
3 fertilizer manufacturer.

4 Compost is an important organic amendment used to
5 improve soil quality and soil health. Long-term compost use
6 can substantially improve soil organic matter levels, which
7 have many agronomic benefits to organic crops, as well as
8 reducing pollution risks associated with agriculture.

9 In the early days of organic regulation, a broad
10 standard was established by the USDA-NOP. It posited the
11 following for compost: processed manure product should not
12 contain more than 1,000 MPN fecal coliform per gram of
13 processed manure and not contain more than 3 MPN salmonella per
14 4 grams of processed manure.

15 Over the last 15 years, food safety for compost has
16 been thoroughly assessed in the produce industry by both the
17 California and Arizona Leafy Greens Marketing Agreement. The
18 acceptance criteria are much different, less than 100 MPN fecal
19 coliform per gram total solids, and negative or below detection
20 limit for salmonella, less than 1 MPN per 30 grams, and
21 negative or below detection limit for S-tech.

22 We believe the limit of 3 MPN per 4 gram for
23 salmonella and the threshold of 1,000 MPN fecal coliform per
24 gram are unacceptably high rates compared to the produce
25 industry. We strongly encourage NOSB to adopt food safety

1 compost criteria utilized by California and Arizona Leafy
2 Greens Marketing Agreement.

3 Consumer Reports has partnered with The Guardian to
4 investigate how pesticides contaminate the U.S. food supply and
5 what we can do about it. They recently released studies that
6 strongly recommended consumers switch to buying organic produce
7 to reduce risks to pesticide residues. This concept of organic
8 food being safer than conventional food is powerful. We need
9 to push it forward.

10 A major step forward would be to advance food safety
11 of organic food, including updating the acceptance criteria for
12 compost in organic production. Thank you again for allowing us
13 to comment on NOSB discussion document for compost and thank
14 you for serving on the National Organic Standards Board.

15 CHAIR SMITH: Thanks for your comments, Ramy. Any
16 questions for Ramy? I don't see any. Thank you so much.

17 MR. COLFER: Thank you.

18 CHAIR SMITH: Okay. Michael -- next up was Michael
19 Deakin. I'm feeling like maybe we didn't have Michael.

20 MS. ARSENAULT: I'm not seeing Michael.

21 CHAIR SMITH: Okay. What about Seth Kroeck? Hi,
22 Seth. I can -- I cannot hear you.

23 MR. KROECK: Morning.

24 CHAIR SMITH: Oh, there we go, great. State your
25 name and affiliation, and then you can get started.

1 MR. KROECK: Good morning. My name is Seth Kroeck.
2 And for the last 20 years, I've grown certified organic
3 vegetables and wild blueberries at Crystal Spring Farm, New
4 Brunswick, Maine. Currently, I serve on the board of the Maine
5 Organic Farmers and Gardeners Association, the Organic Farmers
6 Association Policy Committee, the OFA crop insurance workgroup,
7 and I am a top mentor farmer.

8 Thank you for your service on the Board and for the
9 chance to speak today. I appreciate the opportunity to comment
10 virtually during the busy spring season.

11 My farm is almost 200 certified acres and has been
12 tilled since colonial times. Our wild blueberry crop was
13 tended by indigenous farms from a noble time before that. Our
14 fields are surrounded by forests and broken up by perennial
15 planting, which shelter and host a wide range of species
16 beneficial to both our crops in the wider ecosystem that the
17 farm and my family are an integral part of. Because of careful
18 rotations, our soils host a diversity of organisms, large and
19 small, that dwarf the number we can see above the surface.

20 The farm produces for wholesale. We wash, grade,
21 store, and package our produce, and then send it off into the
22 world of retail grocery. The vast majority of my customers,
23 the people that enjoy a crisp sweet carrot or a tart deep
24 purple blueberry will never have the chance to visit my farm or
25 ask me questions about how I grow the food that feeds their

1 families. What they can do is use the organic seal to choose a
2 product that they can trust.

3 In the 20 years that I've been a certified grower,
4 there has been an unprecedented consolidation in retail
5 grocery. Small local chains are gone. Large regional chains
6 are still around but in name only, having been absorbed by four
7 publicly traded behemoths. This consolidation has continued
8 onto the shelves as produce departments are dominated by
9 private label items and a handful of corporate brands that use
10 their market dominance to crowd out local and regional
11 production and distribution.

12 Unfortunately, consolidation in the market has gone
13 hand-in-hand with distortion or outright defiance of organic
14 standards. Several large brands shop for organic certifiers
15 that allow their input-focused production and move production
16 to cheaper labor markets abroad where certification lacks
17 redundancies or in some cases integrity.

18 The current lack of enforcement around hydroponics
19 and aeroponics is the leading issue for farmers that are
20 members of the Organic Farmers Association year after year.
21 And while growing techniques are technological -- while these
22 growing techniques are technological wonders, they are not
23 organic. And when they're allowed to display the organic seal
24 while controlling a majority of a grocery category, it's an
25 insult to injury to those of us smaller growers.

1 I spent more than half of my life learning how to
2 farm. I hope to continue to do my job in the future. And I
3 ask that you on the Board, serving in our name, defend the
4 standard so that I can. Thank you very much.

5 CHAIR SMITH: Thanks, Seth. Questions for Seth? Oh,
6 Nate, go ahead.

7 BOARD MEMBER POWELL-PALM: Hey, Seth. Can you hear
8 me all right, Kyla? Okay. Hi, Seth. I really appreciate what
9 you just said about retailers and consolidation. And I was
10 wondering if you have any ideas for how we can empower those
11 who are independent retailers to be able to tell the story of
12 organic. I think I go into a lot of independent grocery stores
13 and, and ask is this organic. And they're sort of wishy-washy
14 about it. They don't really know how to see organic as a
15 selling point for their supply chain. I didn't know if you
16 have any thoughts on what we can do to help on that?

17 MR. KROECK: Thank you for the question, Nate. I
18 think, you know, the retailers that we've had great success
19 with and continue to through this process of change, are the
20 ones that, that we as growers create personal relationships
21 with, with the buyers. And then can then -- those buyers in
22 the markets can then convey that relationship to their
23 customers.

24 And so, you know, I spend time in stores doing
25 tastings and talking to customers. I try and have produce

1 buyers out to my farm so they can see what we do, understand
2 the complexity of what's going on. I think, you know, the
3 understanding organic has always been a difficult thing to
4 educate the public on. And I think generally people understand
5 that it's a lack of synthetic pesticides in fertilizers.

6 But the idea that we're really trying to grow in
7 concert with the environment and produce a better, healthier
8 food product for people that's really a major output of that
9 process is what's sometimes lost. And so where we can bridge
10 that, that connection between growers and buyers in wholesale
11 by getting, getting growers into the market and getting buyers
12 or, or even the public out to our farms to see a little bit
13 about what we do is, is something that we've had some limited
14 success with locally.

15 BOARD MEMBER POWELL-PALM: Thank you.

16 MR. KROECK: Thank you.

17 CHAIR SMITH: Okay. Allison, please go ahead.

18 BOARD MEMBER JOHNSON: Thanks, Seth, for being here
19 and your comments. I really share your concerns about
20 consolidation, and what that means for our marketplace, and
21 how, how we grow our food. And I'm curious if you have
22 thoughts about what specifically the Board could do to be
23 helpful here.

24 The one thing we can do is, is gather information,
25 and sort of pull it together, and share a range of perspectives

1 with USDA. Maybe something around, you know, disparities
2 between farm price and consumer pricing, or something along
3 those lines. I'm curious if there's anything that you think we
4 could do to be particularly helpful to you?

5 MR. KROECK: Yeah, thank you for that question. I
6 think what I was trying to highlight in my -- in my testimony
7 was that consolidation in markets seem to be running parallel
8 with a direct or an indirect push up against the organic
9 standards and trying to kind of weaken those standards or find
10 places where the standards can be met really as minimally as
11 possible.

12 And so I think, you know, in your service to the
13 Board, the more that you can really look at the standards that
14 we have and, and some of the motivations behind why we have
15 them, and, and take changes or, you know, challenges to those
16 that come up in the future, and look at them through that lens
17 to protect small growers or those of us who have been doing it
18 a really long time and really believe in, in organic as a way
19 of producing food that's in concert with the farms that, that
20 we're working on and the ecosystems that they're a part of. So
21 looking through that lens.

22 It's complicated. It's not easy. But I think that's
23 really kind of the foundation of the organic movement is that
24 we are trying to do something that is complex and, and working
25 with nature. And quite often, that's not the simple route

1 forward. So maybe not the best answer, but I really appreciate
2 the question.

3 BOARD MEMBER JOHNSON: Thank you so much. I
4 appreciate it.

5 MR. KROECK: Yeah.

6 CHAIR SMITH: Thanks, Seth. Thanks for your comments
7 today and for being with us.

8 MR. KROECK: Thank you.

9 CHAIR SMITH: Next up we have Terry Shistar. I'm
10 going to just circle back around real quick just to make sure
11 do we have Matthew Fitzgerald, or Grant Marcuccio, or Michael
12 Deakin. And up next we'll have Terry. And then after Terry,
13 we'll have Julia Barton and then Mike Menes.

14 MS. SHISTAR: Okay, I have some -- a PowerPoint.

15 CHAIR SMITH: Slides, I believe, yep. Wait just a
16 sec till we get those up. Awesome. Okay, Terry, don't forget
17 to state your name and affiliation, and then you can get
18 started.

19 MS. SHISTAR: My name is Terry Shistar and I'm on the
20 board of directors of Beyond Pesticides. You are condemned to
21 again hear me talk about so-called inert ingredients. More
22 details are in our written comments. NOP has repeatedly tried
23 to divert our attention from the crucial issue, one that has
24 threatened the integrity of organic products for more than 20
25 years and continues to do so.

1 The question that must be addressed is not whether
2 these potentially toxic inputs should be individually
3 evaluated, but how to do it. The evaluation of so-called inert
4 synthetic ingredients in products used in organic production is
5 not optional. It is required by law. NOP must allocate
6 resources for this project.

7 Because of the NOSB's intensive review of active
8 ingredients and the lack of oversight over other ingredients,
9 the so-called inert ingredients pose greater risks than the
10 active ingredients. Inert ingredients make up the largest part
11 of most pesticide products and here are some examples. And
12 inert ingredients are generally not listed on pesticide labels.
13 So NOP and the NOSB have been allowing unknown toxic mixtures
14 to be applied to organic crops and livestock.

15 But onto the real issue, how to deal with inerts.
16 First, identify the materials needing review. Second, pass a
17 binding recommendation that will require USDA to act. And,
18 third, establish a review, review process.

19 We estimate that there are 137 synthetic inerts
20 currently used in organic production that must be evaluated.
21 NOP must immediately publish the, the known list with a request
22 that registrants of products approved for use in organic
23 production notify NOP of the inert ingredients contained in
24 their -- in their products.

25 We propose that the NOSB first insist on the

1 publication of that list. The NOSB has undisputed authority
2 over allowed synthetics in organic production and should not
3 shy away from taking a strong position.

4 Second, we have proposed substitute language for
5 these substances on the National List, establishing a timetable
6 for sunsets. Here, we list categories of substances as
7 previously determined by the inerts working group, but more
8 details are in our written comment.

9 The exact assignment of inert ingredients to the
10 review groups can, of course, be adjusted to meet the
11 convenience of the NOSB and contracted reviewers. The
12 substitute listing should be approved at the fall 2024 meeting.
13 Details of the review process can be worked out while the
14 system is grinding away at the -- thank you.

15 CHAIR SMITH: Thanks, Terry. You have a question
16 from Amy.

17 VICE CHAIR BRUCH: Terry, thanks for your time today.
18 Thanks for all your comments. I really appreciate the
19 thoroughness of them. I had a question for you. I appreciate
20 your, your elaboration on the strong position to review inerts
21 that Beyond Pesticides has. I wonder what your thoughts are on
22 our equivalency partners that currently, as some written
23 commenters have mentioned, do not have as thorough of a
24 process.

25 So maybe there where -- I guess maybe when we receive

1 products, imports from these equivalency partners that have not
2 had a stringent review on these inerts coming into our country,
3 how -- can you just talk the difference that we want to have a
4 level playing field here and our oversight on our equivalency
5 partners could be potentially different than what our internal
6 controls are based on your recommendation.

7 MS. SHISTAR: I admit that I don't understand how the
8 equivalency process is working, because it does seem to me that
9 we don't always require of other countries what we require
10 here. So I guess I can't answer that question, because I don't
11 really understand how it works.

12 VICE CHAIR BRUCH: No problem. I might pop that
13 question up for another person. But I appreciate just your
14 kind of just meditating on that. And if you have a thought in
15 the future, I guess just reach out to us and let us know.
16 We're trying to level the playing field here. Thank you.

17 CHAIR SMITH: Thanks, Amy. Terry, you have another
18 question from Nate. Go ahead, Nate. You're not --

19 SECRETARY LEWIS: Here I am. Thanks, Terry. I do
20 not feel condemned to hear your comments. I really appreciate
21 Beyond Pesticide's clear and articulated roadmap. And it's
22 really helpful for the Board to have such a -- such a set of
23 clarity to consider.

24 My question for you is actually related the livestock
25 sunsets comments that you submitted. Are you willing to

1 entertain comments on or questions on that, or should I --

2 MS. SHISTAR: I will try to remember, yes, okay.

3 SECRETARY LEWIS: Okay. If not, I think I saw Jay on
4 the list, too, so maybe he'll be able to fill in some blanks.
5 The first question is related to iodine or teat dips and you
6 all recommend using the language alkylphenol ethoxylates as a
7 potential annotation. I just want to correct -- or I want to
8 make sure I have it correct, is that kind of the broad category
9 of what we sort of in the organic community call NPEs? Like is
10 nonylphenol the umbrella term, is that correct?

11 MS. SHISTAR: Nonylphenol ethoxylates or NPEs are
12 part -- are a subclass of alkylphenol ethoxylates.

13 SECRETARY LEWIS: Okay. So all NPEs are alkylphenol
14 ethoxylates, but not all alkylphenol ethoxylates are NPEs?

15 MS. SHISTAR: Right.

16 SECRETARY LEWIS: Okay. Cool, I'm glad we got that
17 straight. That's really helpful. I appreciate that. And then
18 the second one is related to methionine. And I see that you
19 all support vitamins and minerals when feed and forage is not
20 sufficient for animal health. And I'm, I'm curious why you
21 don't or wouldn't support something similar for methionine. So
22 what's unique about methionine to not, not support something in
23 line with vitamins and minerals?

24 MS. SHISTAR: Well, methionine is a synthetic amino
25 acid, so it's not -- it doesn't quite fit into vitamins and

1 minerals. And, and I think that we would support something
2 with a similar kind of annotation for the methionine. But, but
3 I think it's being used more broadly and it's used to, you
4 know, industrialize the poultry industry.

5 SECRETARY LEWIS: Got it. Thank you.

6 CHAIR SMITH: Any other questions for Terry? I don't
7 see any. Thanks, Terry, so much. Up next we have Julia
8 Barton, then Mike Menes. Then Klein Njoume, who maybe we don't
9 have. But that's who is -- who is up in the queue. Julia,
10 welcome, and don't forget to state your name and affiliation,
11 and then you can get started.

12 MS. BARTON: Thank you. Good afternoon or good
13 morning, yes, I think morning most places. My name is Julia
14 Barton with the Organic Farmers Association. I'd like to share
15 comments today on three topics.

16 First of all, farmer participation in NOSB. Thank
17 you for including both virtual and in-person comments in this
18 meeting. You have already heard from some OFA farmer members
19 and you will continue to hear from more. This way of handling
20 comments offers an opportunity for various types of
21 interactions, for stakeholder input, and for community
22 building.

23 OFA farmers are very clear that we need both types of
24 commenting. More opportunities for communication are better.
25 Thank you for taking time and holding space for this important

1 part of the public process.

2 I also wanted to note that Linda Holly, long-time
3 organic farmer, was going to be with you to comment in
4 Milwaukee on Monday. Linda was a very active member of our
5 NOSB workgroup in preparation for this semester's comments.
6 And it was going to be her first time commenting to the Board
7 after 30 years, more than 30 years as an organic farmer.

8 She has had some health issues come up and she's not
9 going to be able to comment. And I just spoke with her a few
10 minutes ago and wanted to let you all know that we will be
11 sharing her comments on social media. She's also going to
12 share them with Michelle. But if you care to follow OFA on
13 social media, then you can hear from Linda Holly, and we'd
14 appreciate you doing that.

15 Next up, hydroponics in containers. OFA is part of a
16 working group of certification, education, and policy
17 organizations who agree that soil is the foundation of organic
18 agriculture. OFA farmer members are very clear that
19 hydroponics is not a settled issue. We urge the Board to call
20 for a moratorium on the certification of new hydroponic
21 operations and crops grown to maturity in containers until we
22 can utilize our existing NOSB rule-making process to move
23 forward with greater consistency. Please activate the latent
24 agenda item field and greenhouse container production.

25 And finally crop insurance. OFA appreciates the

1 Board's work on this important topic. OFA farmer members have
2 a wide range of experiences with crop insurance and are eager
3 to make crop insurance more fair, functional, informed -- and
4 informed for organic farmers and for all farmers. You've heard
5 from two of our working groups, very active members already
6 this morning. And you'll meet Noah Went, if you haven't
7 already met Noah, in Milwaukee.

8 If you have specific items our group can workshop,
9 we'd be happy to help in that way. And we'd also be happy to
10 respond to any questions you might have. We appreciated the
11 questions that you asked in preparation for this meeting.
12 Thank you for the opportunity to comment, for your time, and
13 for your service. Thank you.

14 CHAIR SMITH: Thanks so much, Julia. Any questions
15 for Julia? I don't see anything. I will just note that we did
16 get Linda's email. And we wish her well-being. Thank you.

17 Okay. Up next we have Mike Menes and then Klein
18 Njoume, if we have Klein. And then after Klein, we would have
19 Abby Youngblood. Mike, don't forget to state your name and
20 affiliation, then you can get started.

21 MR. MENES: Hold on, I want to make sure you guys can
22 hear me okay? Okay, great. Thanks, Kyla. Good morning,
23 everybody. My name is Mike Menes. I work at True Organic
24 Products. I'll start out by saying thank you to the NOSB for
25 your tireless efforts in organic. The work you do continues to

1 have great impact on the foundation of organic.

2 Let me also mention that I have submitted -- quickly
3 mention that I have submitted a petition to reclassify ammonium
4 extract. We are requesting to take a deeper dive and a deeper
5 look into ammonium extract as a synthetic. But that's already
6 been submitted.

7 But my focus today is on my -- my comment today is
8 not on this, but on the oversight to deter -- deter fraud --
9 deter fraud residue testing in the global supply chain
10 discussion document. Thank you for the opportunity to comment
11 on this. I've been working at True for 15 years. Our mission
12 is to make organics work for a better world. Since day one,
13 I've had the opportunity to work on organic integrity as a
14 priority.

15 Historically, we've been actively participating in
16 efforts to deter fraud throughout the supply chain. In fact,
17 the motivation behind our name is true organic products. Early
18 on, I was curious about what the criteria and associated
19 testing was for determining if a tomato, for example, was grown
20 organic. The understanding was that the testing was limited
21 only to pesticide residues and was done with some regularity.

22 We submit to you that it is all prohibited
23 substances, not just pesticides. All this is in my written
24 comment. And I do want to make sure that I made three distinct
25 requests for clarification and guidance.

1 Number one, certifying agents already have the
2 authority under 205.670 to test for prohibited materials and is
3 not limited to pesticides, hormones and products, and GMOs. It
4 is all prohibited materials. So the request is to clarify that
5 certifying agents have the authority to test any prohibited
6 substances.

7 Certifying agents -- number two, that certifying
8 agent have authority to test for agricultural inputs like they
9 would with soil, water, seeds, and all the other things that
10 are listed. The intent would be to ensure that organic
11 growers' entire systems are operating in compliance with
12 organic regulations. So the request is to clarify that
13 ag-inputs and ag-products sold as organic can be tested by the
14 certifying agents.

15 The last one is that material review organizations
16 would also have the same authority to test the same prohibited
17 substances. An example has already been provided with NOP
18 Guidance 5012.

19 We've answered some of these questions in our written
20 comments and focused on Questions 1, 2, and 3 for the
21 prohibited substance or the pesticides, and provide a few
22 examples, and propose a flow diagram. With your guidance and
23 clarification, certifiers and MROs can prevent prohibited
24 substances from entering the organic supply chain, and deter
25 the -- we believe this work can help strengthen organic

1 integrity and protect the USDA organic seal. Thank you.

2 CHAIR SMITH: Thanks so much, Mike. Any
3 questions -- oh, yes, I see Amy has a question for you.

4 VICE CHAIR BRUCH: Yeah. Mike, hi. Thank you for
5 joining us today and that's for submitting your, your written
6 comments. Really appreciate the ones on the residue testing
7 for global supply chain. And I wanted to dive into that a
8 little bit further with you. You mentioned that in your
9 written comments there's only a couple authorized MROs that are
10 certified to ISO standards.

11 When we're looking at this document, we're also
12 looking from a global perspective. So I appreciate the comment
13 that we're not just looking at pesticides. We could be looking
14 at residues, and inputs, and etc. Do you have an idea of how
15 we can execute input testing internationally? I know you have
16 some experience with international, just the value chain. But
17 I just was really curious on the global perspective for input
18 testing.

19 MR. MENES: Yeah. I think great question. Thank
20 you, Amy. By looking at all the certifiers, certainly, the
21 global certifiers that are doing that, that are partnering up
22 with the MROs that are currently part of that. And I think
23 they're, they're doing that to some degree. But giving them
24 more authority and making -- and that's part of this thing is
25 the policy aspect of it. Can we partner up with some of the

1 other certifiers that work globally to be able to do that same
2 custom under 170.65, I believe it is. Also, the ISO 2200 that
3 the laboratories would have to use.

4 VICE CHAIR BRUCH: Sure, that makes sense. It seems
5 like, as Ellie mentioned, we have several international
6 certifiers that are not a part of ACA. And then also, you
7 know, we're fortunate to have certain material review
8 organizations on our shores, but internationally I think
9 certifiers are bearing a lot of the materials review. So,
10 yeah, just thinking on how input testing can be executed
11 internationally, I think is going to be a critical, critical
12 piece to the equation. So thank you.

13 MR. MENES: Absolutely. I'll make a quick -- it
14 wasn't ISO 2200, but the laboratories are ISO 170.25.

15 VICE CHAIR BRUCH: Thanks.

16 CHAIR SMITH: Go ahead, Nate.

17 SECRETARY LEWIS: Residue sampling partner here
18 with Amy. I have another question about the, the testing. I
19 really appreciate you acknowledging that certifiers currently
20 have the authority to test inputs and don't only have to test
21 for pesticides. I, I think that's a point well taken.

22 And I think partly why we're seeing a lot of residue
23 testing for pesticides is because we have well-established
24 testing methodologies and well-established ways to respond to
25 positive results. So I would -- as we move into the

1 exploration of input testing or non-pesticide prohibited
2 substance testing, do you have some suggestions for, on the
3 input side, what we should test for?

4 And maybe we'll start there. And then think about
5 what we would do with positive results down the road. But I
6 think that's sort of where the rubber meets the road. So
7 certifiers, like what should they be testing for, let's say, on
8 prohibited -- probably nitrogen is probably one of the concerns
9 in the input world is synthetic nitrogen coming in, in some
10 way. What kind of tests are available to certifiers for that
11 concern?

12 MR. MENES: Great, yeah. Thanks for the question,
13 Nate. I'll look at it from two different perspectives. One is
14 on the food side, where they're working in produce. But also
15 on the ag-input side. On the ag-input side, we've -- there's
16 some very simple tests that you can do that are very
17 inexpensive, that test for like as you mentioned the nitrogen.

18 So if you look at total nitrogen, how much of that
19 nitrogen is made up of a particular material like ammonia. So
20 they do the total nitrogen test. You do an M&I for nitrogen
21 test and a nitrate test. But it has to work on conjunction
22 with the label.

23 So if you look at derivation statement on the label,
24 it says derived from a protein source, taking any of the
25 protein sources. That is really the primary source of the

1 nitrogen content. And if you test for M&I for nitrogen when
2 it's -- and it's very high compared to what the label claims
3 are, and the nitrate content, then a very easy simple test.
4 That could add up and it begs the question of where did that
5 ammonia come from, where did that nitrate come from, when it
6 was derived from a protein.

7 Beyond that you could do amino acid residue tests
8 where amino acids that make up the proteins, we would expect
9 that the amino acids would be there. So there are some simple
10 tests that you can do for that. And there's a whole plethora
11 of other testing. I go back to our written comment where we've
12 proposed a little bit of a flow diagram on whether some of the
13 questions we can test for this.

14 What you do with the positives afterwards, I guess
15 that remains to be seen. For me, unfortunately, I think it's
16 going to be difficult for that. But being able to understand
17 what is actually out there initially would be very helpful,
18 because I don't think the questions are being asked currently.
19 Thank you, Nate.

20 CHAIR SMITH: I'm going to break my own rule and
21 maybe not even ask a question, but I will just point out that
22 some of the things that I saw in public comments and I just was
23 looking at the regulations is that they're -- and so maybe this
24 -- well, anyway, I'm going to say my thing and then see if you
25 want to respond.

1 But, anyway, in 670(b) it talks about testing of
2 agricultural inputs or products when there is reason to believe
3 that that input or product has come into contact with a
4 prohibited substance. And then there is 670(c) which talks
5 about the, the general periodic residue testing that certifiers
6 are doing.

7 And so I guess I just -- maybe there needs to
8 be -- maybe that's fine and, and all well and good. And maybe
9 that's, that's good. I just wanted to point out that there is
10 like a little bit of difference in distinction on when
11 certifiers are engaging to test non-organic agricultural
12 products -- or not non, things other than organic agricultural
13 products, like inputs or what have you.

14 So I don't know if you want to respond to that, or if
15 there is more guidance, or if that should be different or any
16 way, but there is a little bit of a difference there.

17 MR. MENES: Yeah. I, I think that needs to be
18 explored further certainly. And that's part of the reason why
19 we submitted our comment. Didn't focus a lot on the (b)
20 portion of it, but I did look at the (c) where it was the 100
21 percent regular organic and made with organics.

22 I think (b) needs to be explored a little bit
23 further, the contact and the potential for cross-contamination.
24 But similar to the other there for improving safety to organic
25 products is, is there a possibility for things to come in

1 contact. There's that cross-contamination potential,
2 certainly. I think that needs to be explored. Thank you,
3 Kyla.

4 CHAIR SMITH: Thanks, Mike. Okay. We are like
5 cruising and are ahead of schedule. So we're going to like run
6 through who we have next up, and then we're going to circle
7 back around to see if anybody who was missing when they were
8 originally called is here. So up next we have Abby Youngblood.
9 Then we have Kristopher Klokkenga. And then Lily Hawkins.

10 Hi, Abby. Don't forget to state your name and
11 affiliation, and then you can get started.

12 MS. YOUNGBLOOD: Hi, Kyla. Thank you so much. Thank
13 you to the Board for your work. I'm Abby Youngblood, Executive
14 Director at the National Organic Coalition, or NOC. The past
15 several years have been pivotal for the organic community.
16 Together, we close loopholes for the most pressing organic
17 integrity issues. With the origin of livestock strengthening
18 organic enforcement, and organic livestock and poultry
19 standards rules across the finish line, NOC is now considering
20 how to prioritize our future work.

21 Looking forward, three of our top priorities include
22 the omnibus nitrogen proposed rule, increasing organic seed
23 usage, and creating consistency for greenhouses, containers,
24 and hydroponic systems.

25 On the nitrogen rule, the NOSB has already passed

1 unanimous or near unanimous recommendations to limit high
2 nitrogen, non-synthetic fertilizers. The National Organic
3 Program has taken the step of consulting with the EPA. But
4 after nearly a year, there's still no EPA response. As time
5 passes, this new regulation will become much more difficult to
6 adopt. So we're asking that the Board use your influence to
7 urge USDA to move forward with this rule.

8 On organic seed, we are dismayed that organic seed
9 usage has stagnated. There has been no meaningful improvement
10 in the use of organic seed over the past five years. And parts
11 of the NOSB recommendations from 2018 and 2019 were never fully
12 implemented.

13 In the meantime, new challenges are emerging. USDA
14 has determined that the use of CRISPR genetic manipulation does
15 not have to be identified to end-users. So organic growers may
16 not realize that some of the conventional seeds they're using
17 have been genetically altered using an excluded method. This
18 is a topic that the NOSB should take up.

19 On greenhouses, containers, and hydroponic systems,
20 these production methods continue to proliferate and we're
21 concerned about the lack of standards and very large
22 discrepancies from one certifier to the next. We urge you to
23 add standards for these systems to your work plan.

24 In the last bit of time that remains, I want to
25 highlight two topics that relate to excluded methods. First, I

1 want to let you now that NOC fully supports the technical
2 review template update, which will help fill gaps in
3 information that were not covered in the prior TR template, and
4 the additional questions on excluded methods are very
5 important.

6 For the handling subcommittee, I want to draw your
7 attention to the detailed comments that NOC made on numerous
8 issues related to products of fermentation. One issue is that
9 several products of fermentation that are on the National List
10 may be made using genetically engineered organisms or GE
11 substrates. And there is a lack of clarity as to how
12 fermentation should be reviewed with respect to excluded
13 methods. So we need a clear policy on this and we ask that you
14 add it to your work plan.

15 We hope that you will continue to lean on the
16 experts within NOC's membership to keep moving your work
17 forward. Thank you so much.

18 CHAIR SMITH: Thanks, Abby. Go ahead, Amy.

19 VICE CHAIR BRUCH: Yeah. Abby, thanks for joining us
20 today and thanks for all the comments NOC has submitted. I
21 actually have two questions for you. One is about the seed
22 comment that you just stated. So when we look at this, you
23 know, expanding organic seed usage, that's really important.

24 What's your stance on that from an international
25 perspective, because I believe international, at least when we

1 talked in previous public comments, you know, it's just we
2 don't have that much data on international like usage,
3 availability, etc. with organic seed. And I guess based on my
4 experience I think that's pretty minimal.

5 So are we setting ourselves up for higher standards
6 in the U.S. and less standards overseas if we push on this
7 organic seed movement. What's your thoughts on that?

8 MS. YOUNGBLOOD: Sorry, it wasn't allowing me to
9 unmute myself for a second there. So that's such a great
10 question, Amy. And it's a really good question also for Cat
11 McCluskey, who will comment in person in Milwaukee, because
12 Organic Seed Alliance has done a ton of work on organic usage
13 and they've looked at that international context. In fact, the
14 EU, as I understand it, serves as a model for the U.S. in
15 encouraging greater organic seed usage.

16 And one of the things that I understand even though I
17 don't have deep expertise in this area is that one of the
18 things that we really need to do in the U.S. is once we
19 determine that there is sufficient quantity and quality of a
20 particular variety, we need to move towards requiring organic
21 seed usage. And that's something that's been done more
22 effectively in some other parts of the world using databases
23 and other resources to track progress. So I think we actually
24 have a lot to learn.

25 But I think it's a valid question about how our

1 regulations compare to some of the other regulatory systems
2 that we have equivalency with. And I think Cat is better
3 positioned to answer it, than I am.

4 VICE CHAIR BRUCH: No problem. I, I appreciate your
5 answer. Thank you so much. And then second question, in your
6 written comments and I really appreciated these, you
7 highlighted with a graphic the barriers to organic
8 certification. And mentioned, you know, the NOSB should take
9 up, you know, some of the items there to remove those barrier,
10 which I, I think is really important.

11 I wanted to get your thoughts though on there's been
12 some producers already on the call today that have mentioned,
13 you know, barriers to retention of our organic producers. And
14 I wanted to know NOC's position on, you know, just how do we
15 retain these organic growers that are talking about markets and
16 the, the pressures of imports, etc.

17 MS. YOUNGBLOOD: Yeah. Thank you so much for raising
18 that. And that graphic that you mentioned is in the slide deck
19 of my colleague Alice Runde, who is presenting just a little
20 bit later. But I just want to pick up on a theme that I heard
21 from some of the organic producers who have already spoken,
22 which is the organic integrity piece.

23 And certainly for us, you know, we know we lost a ton
24 of, for example, organic dairy producers because of the lack of
25 the origin of livestock rule. So having a regulatory system

1 where we can see those loopholes and fix them more in real
2 time, and have some kind of quicker progress. The regulatory
3 system isn't going to move at lightening speed. But we need
4 something that's more responsive. I think that's really
5 important.

6 That's actually something that NOC and many other
7 groups have been working on in the Farm Bill process, to get a
8 regulatory system that's more nimble so we can close loopholes
9 more quickly. And certainly you're the expert in the organic
10 grains sector, the lack of timely action to address fraudulent
11 product imports domestically as well and getting our arms
12 around that is really critical to the retention piece. So
13 we're excited to keep working on those issues.

14 VICE CHAIR BRUCH: Thank you, Abby.

15 CHAIR SMITH: Thanks, Abby. You have a question from
16 Mindee. Mindee, please go ahead.

17 BOARD MEMBER JEFFREY: Hi, Abby. Thank you so much
18 for the work that you do in NOC, that your group does. Forming
19 consensus on public comments is hard. So thank you for doing
20 that.

21 Just thinking about that comment you made about
22 CRISPR and that USDA isn't requiring transparency, if the NOSB
23 is making recommendations on excluded methods, where is the
24 agency now? Like where is the lever for moving forward on
25 these things when we -- it's hard for us to live into our

1 regulations when we're making the recommendations and they're
2 not moving forward.

3 So where have you had any other big picture thoughts
4 about how we move forward with these kinds of issues in the
5 juggernaut? And then sort of how that dovetails into this
6 chicken and egg question around the TR template where when
7 we're asking -- we need to ask questions to become -- to be
8 capable of making coherent recommendations as the NOSB.

9 But if there's no movement and there's resistance to
10 asking the question, where is that -- what's, what's the next
11 lever for us and what do you see out there in the world as big
12 picture thinking on how do we accomplish our goals and excluded
13 methods?

14 MS. YOUNGBLOOD: Thank you for the question. It's a
15 really hard one. I think just on that piece of asking the
16 question or not asking the question, NOC just believes we have
17 to ask the question. We can't stick our head in the sand. And
18 you've seen us on a variety of issues from inerts to excluded
19 methods, like there is no gain over the long term in not having
20 that information available and not addressing those challenges.
21 So you heard our full support for knowing where excluded
22 methods are popping up and in the -- in the TRs having that be
23 part of it.

24 In terms of getting movement from USDA, you know, I
25 think it's time to open up some conversation again about if

1 guidance as we had, you know, for a long time the organic
2 community has pursued guidance to codify NOSB recommendations.
3 I think we need to have a more frank conversation with the NOP
4 over the viability of that path forward versus a regulatory
5 path to get the clarity we need.

6 Different administrations view guidance differently
7 and kind of what you can do through guidance. So I think
8 that's where the conversation is at. I think as you're
9 well-aware, you know, there's maybe a right moment and a not
10 right moment to push some of these things forward. So we have
11 to look for that as well, where the opening is to get some of
12 what the NOSB has done on excluded methods codified, it's a
13 really hard issue for us.

14 BOARD MEMBER JEFFREY: Thanks so much, Abby.

15 MS. YOUNGBLOOD: Thanks for the question, Mindee.
16 Let's keep talking.

17 CHAIR SMITH: Okay. Up next we have Kristopher
18 Klokkenga. Then Lillian Hawkins and then Alan Lewis. Don't
19 forget to state your name and affiliation, and then you can get
20 started.

21 MR. KLOKKENGA: Hi. My name is Kris Klokkenga. I am
22 a fourth generation farmer based here -- can you hear me?
23 Yeah, okay. I'm a fourth generation farmer based here in
24 Illinois. Central Illinois is where I'm located. I just -- my
25 family and I, I have extensive work -- I worked in Ghana, West

1 Africa, for eight years. Two years, I worked at a processing
2 plant. And six years, I started a farm there. My wife and I
3 needed to figure out a way to come back home and farm. And at
4 that time, we decided to come back and convert our farm from
5 organic -- from conventional into organic.

6 We went from a crop rotation of looking at only corn
7 and soybeans to now we're growing corn, soybeans, oats,
8 alfalfa, popcorn, white corn, and yellow corn. And so
9 we've -- we're excited to come and to farm because, at that
10 time, we got to participate in the organic market because when
11 we started it was fair to the farmer. The system valued what
12 the American organic farmer did. And I believed that and I
13 still believe that.

14 But the fact of the matter is that imports are
15 threatening our viability for the American organic farmer. Our
16 current price of corn and soybeans is nearing the cost of
17 production. And some farmers are getting out because the price
18 has dropped.

19 I just -- the work that CACS has been doing is
20 invaluable from looking at how to expand organic markets to
21 improving the crop insurance for organic producers. There's a
22 lot of good stuff going on. But we need to be testing all of
23 these imported feed grains to ensure there is a level playing
24 field. I fully support figuring out how to use testing to stop
25 any imported grains from being imported into our country.

1 With my experience in, in West Africa, I sourced -- I
2 sourced my, my raw ingredient from Burkina Faso, from Ivory
3 Coast; Togo, Lome; and Ghana. And these countries are stating
4 that they are able to export soybeans and like, like products
5 that are organically, organically produced. And I would just
6 state that from a guy who has on, on the ground, boots on the
7 ground, it's very unlikely that that's happening.

8 These countries struggle to produce the food that
9 they need to eat. A soybean, in order for it to be produced by
10 the average person in Ghana, it would have to go to a crushing
11 facility, be processed, and then made into -- made into soybean
12 meal or soybean oil to use as cooking or to feed their
13 chickens. It's just not, not likely that this is happening.

14 And I just want to try to remain profitable here in
15 Central Illinois so that my family can continue to succeed, and
16 that we can continue to produce organic food. And do our part
17 to, to just strengthen our industry and our farm.

18 CHAIR SMITH: Thanks so much, Krisopher. Stick
19 around. You have a question from Amy.

20 VICE CHAIR BRUCH: Kris, hi. Thank you for joining
21 us, today, and lending your voice to the process. I just had a
22 question. You said you had experience farming in Ghana. And
23 that's a tropical environment. Can you just talk to just in
24 general yields and quality of growing crops in a tropical type
25 environment?

1 MR. KLOKKENGA: Yes. So I had a farm on Lake Volta,
2 a 40-acre, under 40-acre center pivot. There's two rainy
3 seasons in Ghana. We plant one crop starting in March. The
4 other crop we would wait and plant again in probably August.
5 The issue with yields were I was yielding probably close to 120
6 bushels in corn, whereas here in the United States we're
7 yielding somewhere close to 250 bushels of corn. I was -- it
8 was not an organic process. I was using nitrogen urea as a
9 fertilizer.

10 The things that you struggle with in, in that
11 tropical climate are also disease and pests. And those are
12 things in, in Ghana. Nigeria has commercial farms. The
13 remaining countries in the area probably don't. But it's just,
14 you know, pests and disease, and then if you have those come
15 in, how do you treat them, because the, the agricultural sector
16 isn't robust enough to handle that.

17 VICE CHAIR BRUCH: Thank you, Kris.

18 CHAIR SMITH: Thanks for your comments today. Next
19 up we have Lillian Hawkins and then Alan Lewis. And then we're
20 going to circle back around to see if anybody who was
21 originally called has joined us. Don't forget to state your
22 name and affiliation, and then you can get started.

23 MS. HAWKINS: Hi, thanks for the opportunity to speak
24 today. My name is Lily Hawkins. I'm the Policy Director of
25 the Organic Farmers Association. Today, I'm going to be

1 speaking on a couple of big picture issues, as some suggested,
2 agenda items that have been raised by our farmer members.

3 First, racial equity. OFA is grateful for the
4 Board's efforts to address racial equity within organic. We
5 encourage you to keep thinking about how the USDA Equity
6 Commission's report findings can become part of the NOSB and
7 NOP's processes, and possibly make this a work agenda item.
8 Institutionalizing equity through strategic outreach or
9 trainings and a racial equity lens is necessary for organic to
10 move forward.

11 Second, global organic movement consistency. Organic
12 is a global movement. And organic farmers deserve to be
13 operating in an equitable marketplace under the organic label.
14 OFA supports the idea of testing imports to verify organic
15 integrity, which has been covered in-depth by other speakers
16 today.

17 Furthermore, as the U.S. organic regulatory system
18 benefits from consistency of interpretation and application,
19 the international organic movement benefits from increased
20 consistency across national organic programs. There are a few
21 materials in which there is a lack of consistent practice in
22 the U.S. system and that conflicts with our trade partners, as
23 well as OFA interpretations and codex regulations.

24 We appreciate the Board's attention to this matter in
25 reviewing individual materials. And OFA agrees that we should

1 bring our standards into greater alignment with the global
2 organic movement.

3 Third, strengthening organic enforcement
4 implementation. OFA is very grateful for the effort it took to
5 bring the SOE rule to the point of implementation. At the same
6 time, we do have some concerns about low risk operations being
7 overly burdened by the increased scrutiny. And the concern
8 that certifiers might be implementing the rule inconsistently
9 in different areas of the country.

10 Our NOSB workgroup noted that the paperwork for
11 feedstock, for livestock, for mixed vegetables were more
12 burdensome this year. We've heard some cases of the OSP length
13 doubling from last year to this year. And we do understand
14 that the intention of the SOE was not to increase paperwork
15 burden for low-risk organic operations.

16 So we request that the NOP during their certifier
17 accreditation audits review the changes made to operating
18 system plans with a critical eye to the burden that's placed on
19 low-risk and mid-scale operations. We want SOE to focus where
20 it was intended. We also further along that line encourage the
21 NOP to support dialogue among certifiers to define low-risk and
22 high-risk operations.

23 Then lastly a brief comment on agroforestry and the
24 90/120-day rule. This came up in OFA's annual policy survey
25 of organic farmers and farmers believe that there is need for

1 review of this policy as it applies to agroforestry production
2 systems. Please consider creating an agenda item to address
3 this request. Thank you.

4 CHAIR SMITH: Thanks for your comments, Lillian. For
5 what it's worth, I will just say that the NOP has been
6 addressing that risk-based approach with certifiers, not to say
7 that we don't need more guidance, and wouldn't appreciate more
8 guidance and training. We certainly would. But they have --
9 that's been a focus of, you know meetings and trainings. So I
10 appreciate your comments there. Mindee, please go ahead.

11 BOARD MEMBER JEFFREY: Hi. Thank you so much for
12 your work. I was curious. In your written comment, you
13 commented on post-consumer garbage as far as compost is
14 concerned. And that the regulations are working and that
15 excellent compost is being made.

16 So I was wondering how if you could sort of clarify
17 what that means. Is it that you're seeing food waste as risky
18 for contamination or just post-consumer food waste as risky?
19 Or food waste that has compostables in plastic? Or like where
20 the line is from OFA's perspective on feedstocks around
21 contamination. Oh, I think you're muted. I'm sorry. Still
22 muted, Lily, sorry.

23 MS. HAWKINS: There, okay. It wouldn't let me unmute
24 myself for a minute there. So our written comments are a group
25 effort. So other speakers from OFA who are speaking later in

1 the program might be able to address this issue better.

2 But my understanding is with post-consumer waste,
3 there is a risk of contamination from packaging. And we can't
4 truly know what's being put into that compost stream. As a
5 home composter, we have a new curbside composting program where
6 I live. And I know there's stickers and things getting in
7 there and, you know, who knows. We have children. And it just
8 doesn't have the oversight that, that the current stream has.

9 BOARD MEMBER JEFFREY: Thank you.

10 CHAIR SMITH: Thanks, Lily. Okay. Next up we have
11 Alan Lewis.

12 MS. ARSENAULT: Alan is on the phone with us. So we
13 just give him a --

14 MR. LEWIS: Am I here?

15 CHAIR SMITH: You are here, yes. We can hear you.

16 MR. LEWIS: Great. Alan Lewis --

17 CHAIR SMITH: Great. Go ahead.

18 MR. LEWIS: Were you telling me to introduce, myself?

19 CHAIR SMITH: Yes.

20 MR. LEWIS: Okay. Alan Lewis. I work for Natural
21 Grocers out of Lakewood, Colorado. I want to thank everybody
22 for attending the call and the Board members for their service,
23 of course. In the world of quality and standards, there's this
24 classic quote that says that quality is simply the steps you're
25 going to take to get where you want to be.

1 And I wanted to just talk briefly today about reverse
2 engineering the NOSB and the NOP standards. Because if you
3 reverse engineer it, our standards, looks like we intend to end
4 up with only large-scale organic farmers, largely monoculture,
5 selling to a few hundred natural brands owned by only a dozen
6 CPG holding companies that have access to retail, retail shelf
7 space at one of only five retail chains and maybe a handful of
8 food service wholesalers.

9 The problem is we can idolize small organic
10 producers. But they won't survive without gaining access to
11 affordable, workable aggregation processing, and most
12 importantly markets, someone to buy what they grow. Similarly,
13 we can idolize organic start-up brands, but 99 out of 100 won't
14 make it into national retail markets, won't make it into the
15 holding companies, won't make it into the retailers.

16 Really, in the broadest sense, the future of organic
17 lies with the global small holders, often uncertified but doing
18 the hard work in the dirt, who survive once we've heard the
19 Board today. And while we have to focus on the economic gain
20 in the United States, and not lose our seat in the game of
21 musical chairs of the U.S. economy, we can't overlook that the
22 global organic quality standards are richer and more meaningful
23 than what USDA offers.

24 So in closing, the global organic community continues
25 to move forward on social, political, and ecological issues far

1 broader than what we contemplate or discuss here. And we need
2 to keep an eye on those standards and that organic future as we
3 do our work. Thank you.

4 CHAIR SMITH: Thanks for your comments, Alan. It
5 looks like you have a couple of questions. Mindee, please go
6 ahead.

7 BOARD MEMBER JEFFREY: Thanks, Alan. Appreciate your
8 perspective there. I'm going to diverge a little bit, if you
9 don't mind. Doing the work of talking to the consumer about
10 what does organic mean, and what does non-GMO mean, and looking
11 at a recent survey, I still don't really feel comfortable with
12 the separation from the consumer perspective. And I was
13 wondering in that light what do you think the consumer needs
14 from organic to like really separate us? What information do
15 they need to really separate organic from just non-GMO?

16 MR. LEWIS: I think the market has answered that
17 question, Mindee, because the broad, let's call it an outbreak
18 or a trend of autoimmune and digestive disease, and all these
19 other novel conditions that kids, and elders, and regular
20 people are suffering. That's all being tied back
21 scientifically to the pesticide and toxic load in the
22 environment.

23 As tried and true narratives, the counter noted, of
24 course, is that synthetic biology and miracle medicine will
25 also fix those maladies. And that's the danger that we're

1 facing right now, because those people have unlimited resources
2 and megaphones to make their case that they can fix all of the
3 problems that they've created.

4 CHAIR SMITH: Thanks, Alan. Nate, go ahead.

5 BOARD MEMBER POWELL-PALM: Alan, I appreciate just
6 how high-level your comments were. But I want to dive a little
7 bit down into logistics. We have heard of more the advocacy,
8 nonprofit groups about integrity and how we, you know, prop up
9 the markets, extend the market integrities. But these are big
10 questions. Like consolidation in grocery is billions and
11 billions of dollars. It's not any one standard.

12 And so as a retailer, I would love your hot take on
13 how do we make retailers both able to communicate the value of
14 organic, but also how do we get more retailers into the game,
15 smaller retailers, more diverse retailers, retailers
16 everywhere? How do we as a community partner in this revision
17 in what retail can be?

18 MR. LEWIS: Thank you for the question, Nate. There
19 are no small retailers left. There are a few thousand natural,
20 independent retailers left that used to be the backbone of
21 organic production embedded in communities. So there is a
22 problem.

23 And then we have further consolidation. And I would
24 point out without knowing what it means to point this out,
25 Nate, that this community hasn't chimed in and say Kroger,

1 Albertson's, and Safeway combining to further consolidate
2 retail, that's not a good thing for organic. There is no
3 commitment to organic. There is a commitment to synthetic,
4 highly-processed, monoculture, extract the GMO agriculture by
5 those companies.

6 So we're not even in the game, I would -- I would
7 say. I fought long and hard at the state and national level
8 to, to keep Kroger in its place. But I hope that kind of
9 answers your question. We're not fighting the right battle
10 sometimes.

11 BOARD MEMBER POWELL-PALM: If I could just follow
12 just a second, Kyla. How do we get into the game, Alan?

13 MR. LEWIS: Well, you're familiar with INFRA,
14 Independent Natural Food Retailers Association, and SEMPA down
15 in the southeast. I mean they are trying to court and get the
16 small independents to survive. The small independents are the
17 backbone of this philosophy that cling to clean environment,
18 ways to clean house. But we're in an economy that is not
19 allowing those small retailers to survive.

20 BOARD MEMBER POWELL-PALM: So pure logistics. Do we
21 ask INFRA to get on in this room? Do we chime in from other
22 comments with Kroger? I mean what should this community do?

23 MR. LEWIS: Shop at the stores, for one. Work in
24 your local community with those small, independent retailers.
25 See if other small retailers can be created and supported.

1 They will buy organic and they will create a market for it.
2 Kroger will hang up 20 signs showing farmers who supposedly are
3 local producers. And you talk to those farmers and they say
4 Kroger hasn't bought from me for 10 years.

5 So there is a partnership that needs to be developed.
6 And there's trust that needs to develop. And there's economic
7 co-dependency that need to be developed. Community comes from
8 this tradition of the co-ops, the independent retailers. But
9 they're dropping like flies, worse than flies. They're
10 dropping like flies on DDT in the '50s.

11 And there's only a few thousand left. There used to
12 be 10,000 and before that 100,000. So we've allowed this
13 consolidation to gatekeep us organic small producers out of the
14 market.

15 BOARD MEMBER POWELL-PALM: I'll yield over to Logan.

16 BOARD MEMBER PETREY: Okay, thank you. I mean I
17 agree with, with what you are saying. I want to say that I
18 don't think it's just unique to organic growers. I think
19 conventional growers suffer the same problem with the
20 consolidation of retailers. And as small farmers are trying to
21 -- both organic and conventional trying to, you know, perform
22 and not to be taken advantage of and that.

23 And so it is, it is hard to compete and to stay in
24 the game when you're doing that. And so that's more of just a
25 comment. It's not just for organic. It's also for, for all

1 small farmers, whether they're conventional or organic. And
2 so, yes, supporting the local retailer, that would be a great
3 move, you know, to get back from the corporatism that we have
4 and moving back to smaller. I agree with you.

5 MR. LEWIS: Yeah, thank you for making that point.
6 There is no middle farmer right now. They are either a small
7 holder or you are up in the 1,000 to 10,000 acre level.
8 There's nothing left in the middle.

9 CHAIR SMITH: Thanks for your comments, Alan. Okay.
10 We have reached our scheduled break time. So I am going to
11 circle back around to see if we have some folks. I am looking
12 for Matthew Fitzgerald, Grant Marcuccio, Michael Deakin, and
13 Kline Njome. Sorry, I can't see your -- my thing is in front
14 of your name. I'm sorry. Nate, who --

15 MR. DEAKIN: Michael Deakin.

16 CHAIR SMITH: Thank you. Sorry. The bar at the
17 bottom was like covering your name.

18 MR. DEAKIN: Oh, that's okay.

19 CHAIR SMITH: Okay, great. Michael Deakin. If you
20 could just, yeah, state your name and affiliation, and then you
21 can get started.

22 MR. DEAKIN: Sure, yeah. And thanks for circling
23 back for me. My name is Michael Deakin. And I'm an organic
24 producer. My wife and I farm on 3,000 acres in North Central
25 Montana. I'm a fourth generation farmer. I grew up farming

1 down in Northern Utah. The family farm that I ran down there
2 was certified organic in '94. And we moved up here about five
3 years ago with our two kids. And we're running the farm here
4 and loving it.

5 I just wanted to talk briefly about the overlap
6 between NRCS programs and the National Organic Program. And I
7 realized as a farmer, I read the stuff coming out from the
8 national level on the new NRCS organic program, specifically
9 the organic -- EQIP organic initiative and the EQIP organic
10 transitions initiative. And I get really excited about it, and
11 I'm excited that people are talking about it, and there's
12 funding available.

13 But I feel like there is somewhat of a disconnect
14 between what the national level has set aside and what we
15 actually get to see when we go to our local county offices.
16 And my worry is that everyone is excited about it, the farmers,
17 the people at the national level, and the local offices are
18 willing to help. But my worry is at the end of the program,
19 specifically with the, the new organic transitions initiative,
20 that it'll come back that people weren't interested.

21 And the issues that we're running into are that, one,
22 with the organic transitions initiative there's -- there hasn't
23 been enough outreach at the local level for the farmers to know
24 what's going on. So first I would go in and I'd ask about this
25 at my local office. And they didn't know, they didn't know,

1 and then by the time they really have the information, the
2 application period had already passed.

3 And then, two, with the organic transitions
4 initiative, there's only certain practices that can be applied
5 for through that initiative. And the main one that is touted
6 and, and really the purpose of the program is the 823 organic
7 management. The issue with 823 organic management is that it
8 works great back in the mid-west or maybe in an irrigated
9 setting. But for the majority of the farmers here in North
10 Central Montana, it's a dry land environment.

11 We only get 11, 12 inches of rainfall in a year. And
12 we can do the objectives of 823 organic management. We can do
13 cover cropping. We can do keeping living roots in the soil.
14 But it's almost impossible to actually follow as the -- as the
15 practice has been set out. So the worry is that we'll get
16 people excited about doing practice 823 and they won't be able
17 to actually be successful in doing that.

18 And then just having additional support after the
19 transition with increased funding for the EQIP initiative. In
20 Montana, we only have \$200,000 for the entire state for the
21 year, for the EQIP initiative. So there's just not enough
22 money there to really do anything. Thanks.

23 CHAIR SMITH: Yeah, thanks for your comments,
24 Michael. Anybody have a question? Oh, I see Nate has a
25 question for you. Go ahead, Nate.

1 BOARD MEMBER POWELL-PALM: Thanks so much for your
2 comments, Michael. I appreciate you taking time to be here,
3 today. Did I hear you right, you're farming in North Central
4 Montana and it's working.

5 MR. DEAKIN: Yeah.

6 BOARD MEMBER POWELL-PALM: And you're raising food
7 that everybody wants. And so it sounds like we can do organics
8 in Montana, but 823 isn't really thinking about it in a context
9 base. The way 823 was written didn't think about how organic
10 looks different in different places.

11 MR. DEAKIN: Exactly.

12 BOARD MEMBER POWELL-PALM: If I hear you right, we
13 need to be trying to get NRCS to maybe learn a little bit more
14 about how organic works in these places that aren't necessarily
15 Iowa or Pennsylvania.

16 MR. DEAKIN: Yeah, exactly. And I think it's when
17 you read through the practice, you can see the intent behind
18 it. They want to increase the amount of living roots in the
19 soil through cover cropping, through crop diversity. We can do
20 all that stuff. But just the specifics of practice 823 such as
21 growing cover crops to get one ton of dry matter above-ground
22 biomass in a year, that's just not something we have the
23 growing season or the rainfall to actually produce.

24 So if someone -- they could grow a cover crop, but
25 they can't be successful by following what practice 823

1 outlines.

2 BOARD MEMBER POWELL-PALM: If I might follow-up with
3 one quick question, Kyla. When you, you mentioned going into
4 your office and not having an idea as to what 823 was.
5 Generally, do you feel like NRCS, we just need to train more
6 NRCS folks about organic to get it so that folks on the ground
7 making these program education outreach and decisions have a
8 better grasp or do you feel like their office knows what
9 organic is? I'm sorry if I cut out there. Did you hear me,
10 Michael?

11 MR. DEAKIN: Oh, you were -- sorry, I thought you
12 were talking to -- yeah. No, I think that they -- by and large
13 they are willing to help and they understand organic. However,
14 I feel like their hands are tied based on the programs that are
15 being handed down to them. I, I think they could use -- what
16 they need is a program that can actually be implemented
17 successfully in Montana. And then they need information about
18 how to actually implement that program is what I would say.

19 BOARD MEMBER POWELL-PALM: Thank you so much.

20 CHAIR SMITH: Hang tight here, Michael. Amy has a
21 question for you. Please, go ahead, Amy.

22 VICE CHAIR BRUCH: Michael, thank you for joining us
23 today. Thanks for bringing up the EQIP 823. That's a really
24 important program and we need to make sure we can have that
25 executed at the -- at the state level and the farmer level so

1 producers can really benefit from that program. And I just
2 want to mention one comment about the program.

3 First, it's pretty transformational. It delivers
4 hundreds of dollars an acre benefit to producers that are
5 transitioning. And then when you look at the, the cost share
6 program, that delivers about \$750 an operation. So this 823 is
7 something and I'm speaking to everybody on the call here, we
8 need help to get this in the hands of producers.

9 But just a quick question with it. Do you know of
10 any producers that were awarded an EQIP 823, just awarded the
11 opportunity to put that in action? Do you know of anybody?

12 MR. DEAKIN: I do not. And actually when I went into
13 my local office and asked about it, the soil conservationist
14 there said, you know, we've kind of been told that we, we
15 should discourage people from applying for 823 because we don't
16 believe that it's possible to actually successful follow in
17 Montana. That might be different in other places. But I don't
18 know of anybody.

19 I would be interested in it. I know other people
20 that are interested in it, when you look at the overview of it.
21 But when you get down into the specifics, I, I don't think it's
22 possible to actually follow the 823 as it's written right now
23 in Montana.

24 VICE CHAIR BRUCH: Okay. Thank you for that feedback
25 Michael, appreciate it. More work to be done there.

1 CHAIR SMITH: Thanks so much for your comments today,
2 Michael. Okay. We have reached our break time, you all. So
3 I'm going to do one last call for Matthew Fitzgerald, Grant
4 Marcuccio, and Kline Njoume.

5 And now we will take a break and we will come back at
6 10 after. And we will start with Mark Kastel, then Rebekah
7 Weber, and then Jay Feldman. And we are like right on
8 schedule. So back at 10 after. See you all soon.

9 (Off the record from 12:54 p.m. to 1:10 p.m.)

10 CHAIR SMITH: Okay, welcome back, everybody. I have
11 10 after. And I hope everybody got a snack and a walkabout.
12 We are going to resume with Mark Kastel. Then we have Rebekah
13 Weber and then Jay Feldman. Mark, you can state your name and
14 affiliation, and get, get started.

15 MR. KASTEL: Thank you very much. My name is Mark
16 Kastel. I'm the Executive Director of OrganicEye. We are
17 based in La Farge, Wisconsin. I wish, like members of
18 Congress, the NOSB members were required to take an oath to
19 protect and defend the spirit and letter of the laws governing
20 organics. I'm going to give each and every one of you the
21 benefit of the doubt that that is your goal, placing it above
22 corporate profit.

23 Celery powder. The use of celery powder is a
24 synthetic nitrogen delivery system based on how it's bred, how
25 it's grown, how it's processed. This workaround is intended to

1 deliver the same dangerous compound used as a preservative,
2 albeit with a more innocuous name.

3 The answer to concerns by consumers, by some
4 organizations is to develop a certified organic version of
5 celery powder. How incredibly disingenuous. If research is
6 successful, and I don't know any professionals who believe that
7 it will be due to the copious amounts of nitrogen required,
8 this will equate to developing a certified organic carcinogen.

9 According to the Agency for Toxic Substances and
10 Disease Registry, nitrates are in celery powder, react with
11 amino acids in the digestive system to create dichromates
12 (phonetic) reportedly cause non-Hodgkin's lymphoma, cancers of
13 the esophagus, larynx, stomach, bladder, colon, prostate,
14 thyroid. Do you think that sounds like a material that would
15 comply with the law requiring approved substances not be
16 deleterious to human health?

17 The International Agency for Research on Cancer, an
18 arm of the World Health Organization, assessed the risk of
19 nitrates in processed meats and classified them as 2A probably
20 carcinogens. The body states that in addition to being a
21 likely carcinogen, celery powder may contain even more nitrates
22 than foods preserved with synthetically manufactured versions
23 of the same preservatives.

24 I ask this body to err on the side of caution by
25 reviewing the citations in our written comments, including

1 statements from Consumer Reports and the American Cancer
2 Society before siding with industry lobbyists. In closing, we
3 have certifiers violating the law by accepting hundreds of
4 thousands of dollars in payments over and above certification
5 fees from their clients. Some certifiers here today to lobby
6 you on behalf of their clients.

7 We have unregulated material review organizations
8 where are literally 99 percent of their revenues come from
9 commercial entities with interest in materials. It's
10 imperative that this body act impartially to protect the
11 integrity of the organic label and all stakeholders including
12 farmers, ethical business people, and importantly consumers.
13 Thank you very much.

14 CHAIR SMITH: Thanks, Mark. Any questions for Mark?
15 I don't see any. Thanks for your comments today.

16 MR. KASTEL: Thank you.

17 CHAIR SMITH: Up next we have Rebekah Weber. On
18 deck, we have Jay Feldman and then Dan Langager. Don't forget
19 to state your name and affiliation, then you can get started.

20 MS. WEBER: Hi, can you hear me? I just want to make
21 sure my mike is working. Perfect. Good afternoon. My name is
22 Rebekah Weber. I am the Policy Director at California
23 Certified Organic Farmers, CCOF. Thank you so much for the
24 opportunity to comment.

25 I'd like to focus today on the critical issue or

1 organic farm viability. In our comment on organic food system
2 capacity constraints, CCOF noted that we have seen a net loss
3 of certified farms over the last couple of years. At the same
4 time, the State of California is defining the term regenerative
5 agriculture, which presents both a threat and an opportunity
6 for organic farmers.

7 With this definition, the State will be channeling
8 investments such as direct incentives to farmers and
9 potentially establishing regenerative procurement targets, a
10 critical market opportunity for farmers. This represents an
11 opportunity for farmers to have a stable market of providing
12 food to schools, institutions, even correctional facilities
13 here in the state of California.

14 The State of California so far has expressed an
15 interest in a broad definition of regenerative, an
16 all-inclusive tent. And while we support all farmers having
17 access to resources, we are concerned that an overly broad
18 definition of regenerative is meaningless. There, there won't
19 be the integrity behind the term.

20 And I'm bringing this to your attention today because
21 CCOF believes that the repercussions of a weak definition of
22 regenerative in the State of California are widespread.
23 Organic farmers should not have to compete in a market where
24 regenerative farmers are subsidized by the State, but are not
25 held to the same high bar.

1 I ask that organic sector come together and share
2 with the State of California that regeneration starts with
3 organic. I'm here to share that there is an ongoing
4 opportunity in the State to provide comments and I would
5 welcome stakeholders, NOSB, those across California and beyond
6 to weigh-in to this process. Thank you so much.

7 CHAIR SMITH: Thanks, Rebekah, for your comments. It
8 looks like you have a question from Nate. Nate, go ahead.

9 BOARD MEMBER POWELL-PALM: Hey, Rebekah, thank you
10 for your comments. Can you send the shell, all the details for
11 how we weigh-in on that process and contribute?

12 MS. WEBER: Yes. I can absolutely do that. Thank
13 you.

14 BOARD MEMBER POWELL-PALM: Thank you. Appreciate it.

15 CHAIR SMITH: Okay, thanks so much, Rebekah, and
16 thanks for highlighting that for us. Next up, we have Jay
17 Feldman, and Dan Langager, and then Courtney Lorenz. Go ahead,
18 Jay.

19 MR. FELDMAN: Hi, I'm Jake Feldman, Executive
20 Director, Beyond Pesticides, and former NOSB member. The NOSB
21 was created to play a leadership role in bringing the views of
22 organic consumers and producers, and science-based thinking to
23 bear on USDA, not the reverse. The NOSB therefore is critical
24 to a sustainable future which must be in sync with nature.

25 To this point, we support the notion that organic

1 must be transformational with its practices and allowed
2 substances. In this context, the Board has before it critical
3 issues in the spirit of continuous improvement that must meet
4 the existential health, biodiversity, and climate challenges of
5 our time.

6 Some high priority issues for the meeting would, one,
7 reject the petition to allow unspecified compostable materials
8 in compost allowed in organic production. Synthetic substances
9 in these materials could introduce hazardous contaminants, like
10 PFAS and microplastics. Don't allow organic to get dragged
11 into these escalating crises.

12 Two, get nonylphenol ethoxylates out of organic.
13 Organic must lead on eliminating surfactants or complexing
14 agents containing nonylphenols and nonylphenol ethoxylates,
15 which are strong endocrine disrupters with adverse effects on
16 organ systems and multigenerational effects. This is where an
17 annotation is needed for iodine.

18 Three, ensure the quality of the science on which
19 NOSB decisions are made. The sunset and petition process must
20 not allow the listing of substances without sufficient
21 scientific information. We support the change to the policies
22 and procedures manual to only allow recommendations with valid
23 scientific information and materials impact on the environment,
24 human health, and is compatibility with organic.

25 Four, eliminate nonorganic ingredients in processed

1 organic foods as part of the sunset review. The materials on
2 205.606 up for sunset review this year are made from
3 agricultural products that can be supplied organically and,
4 thus, should be taken off the National List.

5 Now issues critical to organics leadership position.
6 Ensure that so-called inert ingredients in the products and
7 organic production undergo NOSB review. The NOSB has passed
8 repeated recommendations, as you know, instructing NOP to
9 replace a generic listing through inerts that may be
10 biologically chemically active under EPA's former List 3(4)(a)
11 and (4)(b), with specific substances approved for use.

12 Make elimination of plastics in organic a goal and a
13 research priority. Microplastic particles are found in
14 human -- in human lungs, blood, feces, breast milk, and
15 placenta. Keep organic in the forefront. Thank you for our
16 service on the NOSB.

17 CHAIR SMITH: Thanks for your comments, Jay. Any
18 questions for Jay? I think I have one. I think I recall
19 seeing in BP's comments about annotating, and I would have to
20 go back and look at my notes, but anyway annotating a specific
21 substance as only allowing non-synthetics. And I believe that
22 is something that is like on the non-synthetic list of 605.
23 And so I was wondering if that would not just be redundant.
24 But I'm going to go back and check my notes. But I don't know
25 if you recall that and could speak to that at all?

1 MR. FELDMAN: Yeah. It -- yeah, I don't recall that.

2 CHAIR SMITH: It had to do with calcium chloride.

3 MR. FELDMAN: But normally we are, yeah, we're
4 seeking to obviously differentiate some of these products. But
5 as you say, 605 should be non-synthetic. So I'd have to go
6 back and check that.

7 CHAIR SMITH: Yeah. I might have to follow-up with
8 you about that.

9 MR. FELDMAN: Okay.

10 CHAIR SMITH: But, anyway, I did make note about
11 that. But, anyway --

12 MR. FELDMAN: Thank you.

13 CHAIR SMITH: -- go ahead, Nate.

14 BOARD MEMBER POWELL-PALM: I think it might have been
15 around citric acid. But is that not true?

16 CHAIR SMITH: I think it was -- I think it was
17 calcium chloride is like where I made the note. But anyway,
18 I'm going to --

19 MR. FELDMAN: Okay. I'm happy to get back to you on
20 that.

21 CHAIR SMITH: Okay. Well, yeah, I can -- I can
22 follow-up. Thank you so much.

23 MR. FELDMAN: Thank you.

24 CHAIR SMITH: Oh, now I lost my list. Okay. Any
25 other questions for Jay? Sorry. I didn't see any other hands,

1 but just to make, make sure I'm not moving too quickly. Okay,
2 thanks for your comments.

3 MR. FELDMAN: Thank you. Thanks a lot.

4 CHAIR SMITH: Okay. Next up we have Dan Langager.
5 And then after that it's Courtney Lorenz and then Derrick
6 Nyirenda. Don't forget to state your name and affiliation, and
7 then you can go ahead and get started, Dan.

8 MR. LANGAGER: All right, great. Thanks, Kyla.
9 Thanks, everybody. My name is Dan Langager and I'm with the
10 Northwest Horticultural Council. We represent the growers,
11 packers, and shippers of apples, pears, and sweet cherries in
12 the Pacific Northwest, who produce the majority of our
13 country's organic palm fruit.

14 I'd like to direct you to our extensive written
15 comments for the Pacific Northwest tree fruit industry's
16 analysis of the sunset material before the Board, as well as
17 our feedback on the subcommittee discussion related to inert
18 ingredients and compost production.

19 We appreciate the challenges in updating the
20 regulation of both inerts and compost in organic agriculture.
21 We encourage the Board to take a deliberative scientific
22 approach to any changes, while not putting the availability of
23 these products that are critical to organic food production at
24 risk.

25 A reduction in the availability of compost supplies

1 or a rise in compost costs would be challenging for organic
2 operations of all sizes. And it can force them to make tough
3 decisions about the amendments they can afford for the year,
4 which those decisions can really make the difference between
5 staying in business or not during tough years.

6 In terms of the sunset materials under review this
7 year by the crops and handling subcommittees, I'd like to
8 underscore the importance of horticultural oils, pheromones,
9 hydrogen peroxide, potassium bicarbonate, magnesium sulfate,
10 and peracetic acid.

11 All organic tree fruit growers use horticultural oils
12 and they consider it a critically important material. Oils
13 used today have a lighter viscosity, which allows for a smaller
14 application rate compared to products that were used in the
15 provide. They provide a safe and consistent level of disease
16 control at a low cost for growers and low impact to the
17 environment.

18 Pheromones. They are essential to organic and
19 conventional tree fruit production to control pests that often
20 pose a significant threat like codling moth and leaf rollers.
21 We strongly support the continued listing of pheromones, as
22 their loss would be catastrophic for organic tree fruit
23 production. Pheromone-based mating disruption has high
24 efficacy, and low toxicity to humans and natural pest enemies.

25 It has laid the foundation of apple and pear

1 integrated pest management programs and it enables growers to
2 make fewer pesticide applications than would otherwise be
3 necessary. And this ties back into the discussion on inert
4 ingredients. They are essential to successful mating
5 disruption and integrated pest management products.

6 And then finally on peracetic acid, it's widely used
7 across the fresh produce industry as a sanitizer or
8 disinfectant for equipment, and for water sanitation to reduce
9 potential cross-contamination. All organic tree fruit packing
10 facilities use PAA. It does not leave residue on the surface
11 of the fruit. And it is by far the best option for organic
12 approved no-rinse sanitizers.

13 I want to thank the Board members and NOP staff for
14 your continuous hard work. And thank you so much for the
15 opportunity today to provide comment from growers and packers
16 directly to the NOSB.

17 CHAIR SMITH: Thanks so much for your comments, Dan.
18 Looks like you have a question from Brian. Brian, please, go
19 ahead.

20 BOARD MEMBER CALDWELL: Thanks, Dan. Quick question.
21 You know horticultural oils are, are, you know, petroleum based
22 oils. Have any of your growers experimented with vegetable
23 oils, you know, to do the same kind of purposes?

24 MR. LANGAGER: You know, not that I am aware of.
25 It's, it's certainly possible that they tried. But when -- in

1 working with growers to put our comments together, that was not
2 brought up. But I can ask around some more.

3 BOARD MEMBER CALDWELL: Great, thanks.

4 CHAIR SMITH: Go ahead, Nate.

5 SECRETARY LEWIS: Hey, Dan. Good to see you. Hope
6 we'll see you in person next week. I'm not sure. If you can
7 make it out, great. I had a question for you on compost.

8 MR. LANGAGER: Yeah.

9 SECRETARY LEWIS: One of the things that the
10 subcommittee is working on and looking at is the carbon to
11 nitrogen ratio requirements in the standards. And we saw a
12 couple of commenters sort of home in on this issue that when
13 you have really high C-to-N ratios, the compost, the finished
14 product is more of a mulch and potentially a good addition to
15 soil or organic matter, but not particularly beneficial from a
16 nutritive perspective, because it kind of ties up nitrogen and
17 that kind of thing.

18 Do you -- do you all have any thoughts on that
19 particular issue, the C-to-N ratio component of it and whether
20 it's, you know, just I know tree fruit growers look at the
21 world differently than corn and bean growers do, right? So
22 it's like it's important to get it all on the table as we
23 evaluate that stuff.

24 MR. LANGAGER: Yeah, yeah, absolutely. I think it's
25 certainly something worth looking into. I think that the

1 compost manufacturers are ones that probably have a pretty
2 direct knowledge of, of how the different ratios lead to their
3 finished products. Tree fruit growers, like you said, they'll,
4 they'll use it either as an amendment or more as a mulch. I
5 think both are, are important uses for organic tree fruit
6 production.

7 We did not receive in terms of my work with our, our
8 growers, you know, they didn't have a direct input in terms of
9 the specific ratios. I think if it leads to the end product
10 that meets the regulations and meets their needs, then, then
11 that's something that they support.

12 CHAIR SMITH: Thanks much, Dan.

13 MR. LANGAGER: Thank you all.

14 CHAIR SMITH: Next up, I think -- I don't know, maybe
15 we don't have Courtney Lorenz. Courtney, are you there? What
16 about Derrick Nyirenda? Then up next is Adam Seitz. After
17 Adam is Andy Faeh and then Matt Keegan.

18 MS. ARSENAULT: Adam is on the line, Kyla.

19 CHAIR SMITH: Great. Hello, neighbor.

20 MR. SEITZ: Hello, hello. Good afternoon. My name
21 is Adam Seitz and I serve as a senior technical reviewer and
22 policy specialist for Quality Assurance International, an NSS
23 international company and a leading provider for organic
24 certification services worldwide. Check your local grocery and
25 without a doubt you'll find the QAI mark well-represented on

1 its shelves.

2 Thank you NOSB and NOP for your efforts and for the
3 opportunity to comment. Please see our written comments
4 detailing the use of sunset materials by QAI certified
5 operations. It's worth noting that nearly every handler input
6 up for sunset review is in use by a QAI certified operation.

7 Classification and excluded methods verification for
8 handling substances. Several of the handler substances subject
9 to the current sunset review include questions to stakeholders
10 regarding how certifiers verify classification requirements and
11 the prohibition on excluded methods. See our written comments
12 on this front.

13 But in summation, QAI urges the NOSB to review
14 applicable sections and forms within the Accredited Certifiers
15 Association best practices for common material review issues.
16 QAI's practices on classification and excluded methods
17 verification are consistent with these certifier best
18 practices.

19 L-Malic acid. As noted in previous comments, QAI
20 does not currently take a deep dive on L-Malic acid
21 classification as is consistent with ACA best practices. QAI
22 simply verifies that the substance is L-Malic acid and not DL
23 or D-Malic acid.

24 Using current guidance from the NOP, we consider
25 L-Malic acid produced via the two-step process with a synthetic

1 fumaric acid precursor to be synthetic. To QAI, the synthetic
2 fumaric acid is the starting substance in the context of NOP
3 Guidance 5033.1 decision tree. This results in a synthetic
4 classification for the L-Malic acid. While QAI supports
5 relisting L-Malic acid at 605(a) for now, it should be added to
6 605(b) and subsequently removed from 605(a) to reflect the from
7 typically used in organic products.

8 Nutrients, vitamins and minerals. There is not a lot
9 of time to go over this, so check out our written comments. In
10 short, there is not complete consistency among certifiers
11 regarding what substances are permitted in organic products via
12 the 205.605(b) nutrient, vitamin, and mineral inclusion. This
13 is largely due to the NOP's previous interpretation regarding
14 accessory nutrients, as acknowledged in the January 12, 2012
15 proposed rule and the continued allowance of the, quote,
16 "status quo," end quote, implemented by the subsequent
17 September 27, 2012 interim rule which remains in effect.

18 This status quo is the 2006 NOP interpretation that,
19 quote, "The NOP determined that accessory nutrients that are
20 nonagricultural are allowed in the production of products to be
21 sold, labeled, or represented as organic under the NOP provided
22 they are used in full compliance with Food and Drug
23 Administration rules and regulations," end quote.

24 Regardless of some discrepancies on what nutrients
25 are permitted, 605(b) listing should -- we thank the NOSB for

1 its work commitment and expertise, and for the opportunity to
2 comment. Thank you.

3 CHAIR SMITH: Thanks so much, Adam. Allison has a
4 question for you, and then Nate, and then I have one as well.
5 So go ahead, Allison.

6 BOARD MEMBER JOHNSON: Thank you. Thanks for your
7 comments, Adam. The nutrient, vitamins, and minerals, it cut
8 you off there at the end. This is a tricky one. I dug back
9 through the history that you just relayed and, you know, this
10 listing has gone through a number of reviews, lots of ideas
11 about what to do with it, and then it just kind of sits there
12 because I think we haven't come up with a better way to do it.

13 I'm curious if you are aware of any materials that
14 are coming in through that listing that are like either
15 particularly important for handling operations or particularly
16 questionable, and whether there is anywhere that we should put
17 particular attention in, in scrutinizing this listing, and, and
18 whether to keep it as is or try to parse it out.

19 MR. SEITZ: Yeah, appreciate the question. And it's
20 tricky. You know, technically, I think a lot of things could
21 kind of squeeze in under the current status quo understanding.
22 I tried to relay in our comment, you know, we try to be
23 conservative in what we allow on that front. And typically,
24 you know, looking at things that are identified in those
25 proposed rule and interim rules, because there is a whole lot

1 of metabolites that food processors would like to add for their
2 bioactive function in organic food products.

3 But, you know, we more or less --

4 CHAIR SMITH: Did Adam just freeze or did I freeze?

5 BOARD MEMBER JOHNSON: Adam froze.

6 (Pause.)

7 CHAIR SMITH: Yeah, we can follow-up with him offline
8 -- oh, he's back.

9 BOARD MEMBER JOHNSON: You're back. We lost you for
10 a while, Adam.

11 MR. SEITZ: Cell phone hot spot, sorry about that.

12 BOARD MEMBER JOHNSON: No problem. I think we lost
13 you at just after you like to use metabolites.

14 MR. SEITZ: Yes. There are a lot of things that I
15 think organic processors would like to use under, you know,
16 disguise of accessory nutrients and could potentially. But I
17 don't think -- I think certifiers are pretty savvy in not
18 letting that broader field of materials through under that.

19 Things that are important, mostly the things that had
20 been petitioned -- or, I'm sorry, not necessarily petitioned,
21 but were reviewed via kind of what was supposed to be the
22 reshuffle of the listing and the individual listing of some of
23 the nutrients like say DHA. Some of the amino or some of the
24 things that were to be used in infant formulas and such,
25 choline. Even some amino acids we see that, you know, when --

1 we kind of have a tiered approach with these accessory
2 nutrients, so, you know, we try to honor the NOSB
3 recommendations on the individual nutrients. So like for
4 DHA, we enforce what was the NOSB restriction that they had
5 voted on.

6 For some things, especially where the votes were a
7 little bit closer, you know, we may -- we're still conservative
8 in the types of products we allow them to be in, you know, not
9 every organic product, but things like sole source nutritional
10 products where this product is the sole source of nutrition for
11 some folks that have those needs, or medical foods essentially.

12 So, sorry, roundabout way to say most of the
13 nutrients that are identified in that interim and proposed
14 rule, I don't think there is really anything that's not
15 detailed in those that folks are letting slip through under the
16 guise of accessory nutrients. So nothing in addition to those
17 that I would -- I think needs called out specifically.

18 BOARD MEMBER JOHNSON: Okay. That's really helpful,
19 thank you.

20 MR. SEITZ: Yeah.

21 CHAIR SMITH: Thanks, Adam. Go ahead, Nate.

22 SECRETARY LEWIS: I had a question for you related to
23 the discussion around organic availability on 605 materials.
24 And I specifically called out citric acid, which is the sunset
25 material I'm managing. And I'm just trying to get folks'

1 thoughts on, to borrow a phrase from my colleague Mr. D'Amore,
2 whether the juice is worth the squeeze.

3 You know, it takes a lot of resources to do
4 rulemaking. And while we want to push folks to choose the
5 organic option, just trying to weigh all those sort of things
6 when we're dealing with something like citric acid. There are
7 organic options available. I hear they are not functionally or
8 in quantities quite ready to be removing citric acid entirely
9 from the list.

10 So, you know, does, does the commercial availability
11 move the needle? That's the first question. And like what
12 should we be thinking about when considering the potential to
13 add that annotation?

14 MR. SEITZ: Yeah. I think commercial availability in
15 general can move the needle. I don't know necessarily that it
16 should be applied to citric acid. Just I should have my full
17 written comments up so I can reference them. But a lot of
18 folks use citric acid, a very commonly used material. There is
19 not seemingly a lot of organic citric acid on the marketplace.
20 I can't really speak to whether or not now would an appropriate
21 time to try to move that needle or not. But don't know if it's
22 worth the squeeze in this instance.

23 CHAIR SMITH: Adam, I had a question around the
24 proposed TR template. And just with your -- the information
25 that you provided based on QAIs and other certifiers following

1 ACA best practices, and wondering whether or not, and I know
2 ACA was a little bit -- didn't have the resources to put all in
3 their working group, and so I know they're planning to provide
4 additional comments.

5 So, anyway, I just wanted to know from your
6 perspective if having those additional questions around
7 excluded methods, ancillaries, nanoparticles would be welcomed
8 additional information for certifiers. Anyway, just what's
9 your take?

10 MR. SEITZ: I do think it's helpful information. I
11 think that, you know, in those ACA best practices that, you
12 know, we try to use some risk-based approaches in assessing
13 excluded methods, the prohibition on excluded methods. So, you
14 know, a lot of folks that do material review have a good idea
15 of when excluded methods might be used just based on the nature
16 of the technologies.

17 That said, it's good -- would be helpful, I think, to
18 include that content in the TRs to help calibrate, you know,
19 the full community. Like, you know, we're -- we try to be
20 experts in a lot of things. But it's helpful when those deep
21 dives are taken to say, hey, in some cases, you know, this is
22 something to look at. We kind of have an idea, you know, any
23 time that an organism is utilized or there's a fermentation,
24 you know, hey, let's, let's keep an eye out for excluded
25 methods use.

1 But there are advances in what you could or may not
2 consider excluded methods every day, and technology advances,
3 and advances, and advances. So helpful to stay atop of that, I
4 think. And on nanotech, that's complicated for sure.

5 CHAIR SMITH: Yes.

6 MR. SEITZ: Yeah. I think it would be helpful to
7 include that. But I think there is also maybe confusion on
8 exactly what is not permitted or is permitted on the engineer
9 nanotech front and how deep certifiers really go on that. So I
10 think it would be information that is a bad idea to include,
11 but if it is included I think maybe further discussions around
12 engineered nanotechnology as a whole. And how that gets
13 verified, does it get verified would be warranted.

14 CHAIR SMITH: Okay. Yep, fair point. Thanks for
15 your comments. And next up we have Andy Faeh, and then Matt
16 Keegan, and then Mike Appel.

17 MR. FAEH: Am I on?

18 CHAIR SMITH: You are, yep, if you can just state
19 your name and affiliation, and then get started.

20 MR. FAEH: Okay. I am curious about that nanotech.
21 I was just exposed to that here a week ago. And so is that --
22 I heard that there was -- this was something to do with sugars,
23 like something that was supposed to be a potential insect
24 present that had nanotechnology. Are you guys aware of that?
25 I guess I don't --

1 CHAIR SMITH: I don't -- I don't know. But if you
2 have your prepared comments, we are willing to -- we're happy
3 to hear them. And then maybe someone can circle back around
4 with your questions related to nanotech, but in a different --
5 in a different forum. So, yeah, name and affiliation, and then
6 you can get started. Thanks.

7 MR. FAEH: My name is Andy Faeh. Me and my wife, who
8 are Asian, our son Logan, farm about 1,400 acres all of which
9 are organic here in South Central Nebraska. We utilize a
10 considerable amount of cover crops in our operation. We do a
11 variety of different grains including wheat, you know, peas,
12 you know, field corn for, for human consumption, popcorn,
13 soybeans, and blue corn. We, through the years, have grown a
14 lot of no till corn, which is wonderful for the soil, as well.

15 Something I am curious about is what is the continued
16 education of the public concerning the benefits of organic
17 farming on, on the environment and the soil. An initial
18 concern of mine when I started organic was the extra tillage
19 that was involved and what I would do for soil or to the soil.

20 However, through my practices which have been -- or
21 our practices which have been quite a bit of tillage, but also
22 lots of cover cropping and things, our -- at the risk of doing
23 some farm talk here, just the benefits to the soil, organic,
24 organic matter in the soil, our, our tests have shown --
25 overall the different soil tests have increased organic matter

1 of anywhere from 60 to 75 percent on every farm that we've
2 changed from chemical farming, which is all our farms, to
3 organic farming.

4 So I think it's important. I don't know if those
5 kind of -- that kind of information is made available to the
6 public. A benefit of organic farming to the earth, to the
7 soil, itself, is, because, because the chemical farming, I
8 think it's largely misunderstood how detrimental it is to the
9 soil as far as actually taking life out of the soil. So just I
10 don't know, that's just one thing that I'm concerned about as
11 far as people not understanding how detrimental chemical
12 farming is on the soil, which in the big picture can affect the
13 food chain drastically down the road.

14 But another thing, organic integrity domestically and
15 globally, through more testing I believe is -- it's probably
16 already been spoken of here. But the consumer can purchase
17 organic products with confidence that they are, as they are
18 told what is organic is indeed 100 percent organic. We want
19 our consumers to trust the organic label as they want to live
20 healthier lives. And when the consumer hears of these large
21 breaches of nonorganic products, grains coming into the state
22 being pulled into the organic market, it completely undermines
23 those of us who are taking great pains to produce the best
24 quality organic grains and products that we possibly can.

25 CHAIR SMITH: Thanks for your comments, Andy. It

1 looks like we have a couple of questions from some members
2 for you.

3 MR. FAEH: Yes.

4 CHAIR SMITH: So if you could hang tight on the line.
5 First, I have Brian, and then Amy, and then Nate. So Brian,
6 please go ahead.

7 BOARD MEMBER CALDWELL: Okay. Thanks, Andy. Just to
8 be clear --

9 MR. FAEH: Yeah.

10 BOARD MEMBER CALDWELL: -- when you said that you
11 used to do a no till, you were -- that was when you were
12 conventional you did no till or you did the no till organic?

13 MR. FAEH: No. It was no till organic. It was
14 completely tillage with the -- with the conventional, all
15 tillage, yeah.

16 BOARD MEMBER CALDWELL: So, so you were implementing
17 some no till organic on a large scale?

18 MR. FAEH: We still are. We still do.

19 BOARD MEMBER CALDWELL: Yeah. Well, I would have to
20 say two things, you know, the more you can spread that word
21 around to, to your neighbors and extension people at NRCS, the
22 better off we'll be. I believe that also the information you
23 have about increasing soil organic matter under organic
24 management is, is pretty, pretty common experience that people
25 have. And again the more we can share that, that information

1 the better.

2 When I used to -- just a quick aside comment. When I
3 used to do research at Cornell, we took over a piece of ground
4 that had been sort of, you know, pretty much high level
5 management conventional no till. And then after about 10 years
6 of organic management, we definitely got increases in the -- in
7 the organic matter content there, as well. So that was
8 reinforcing what you said. So anyways, thanks a lot. And
9 spread the word.

10 MR. FAEH: You bet.

11 CHAIR SMITH: Amy, please, go ahead.

12 VICE CHAIR BRUCH: Yeah. Andy, thanks for your time
13 here today and joining us. Thanks for your support on the
14 integrity initiatives that the Board is working on, as well as
15 just highlighting some of your real farm research. We have
16 kind of two work agenda items on the Board. One is research
17 priorities and another one is just looking at building
18 transition support.

19 And I was just wondering what's your best method to
20 learn about new practices and deploy them. I know you're a big
21 adopter of trying to move the needle on soil health. So I was
22 just wondering what your best methods are to learn about the
23 new, new things to try on your farm.

24 MR. FAEH: Well, I -- basically, I do a lot of You
25 Tube stuff. I mean I -- when I -- when we started really

1 utilizing and just, Amy, I know you're part of the group that
2 we have locally here in Nebraska, just the practices and, and
3 different things that other organic, and there's, there's
4 broader ones throughout the states, I know, that organic
5 farmers are really good about getting the word out and just
6 sharing knowledge, and successes and failures of different
7 things they've tried.

8 And just so I utilize all those things as far as
9 people's experiences and, and just the help that other organic
10 farmers are to me. So that would be you included, of course.
11 And I really appreciate everybody, too. This is like I don't
12 know how you're doing this. This is like I've been on for, I
13 don't know 45 minutes or so, but this is like information
14 overload here. I don't know how you guys are processing all
15 that stuff.

16 VICE CHAIR BRUCH: Thanks for joining us, Andy.
17 Really appreciate your voice in this process.

18 CHAIR SMITH: Nate, please, go ahead.

19 MR. FAEH: And thank you guys for all the work you're
20 doing. It's appreciated.

21 CHAIR SMITH: And hang tight here, Andy. You've got
22 a couple more questions.

23 MR. FAEH: Yeah.

24 CHAIR SMITH: So, Nate, please, go ahead.

25 BOARD MEMBER POWELL-PALM: Yeah, thank you so much,

1 Andy, for joining us today. Really appreciate your
2 perspective. When you think about getting the word out about
3 organics, I don't know where you live if there is a lot of
4 opportunity to buy organics. But when talking to your farming
5 neighbors or even just your fellow humans who are consumers,
6 what do you think are the, the biggest takeaways that we should
7 be bragging about either environmentally or from a health point
8 of view for the food, to get the word out about organics and
9 grow this thing.

10 MR. FAEH: Well, there's, there's somebody commented
11 earlier just about the detriment. I hate to be -- go on the
12 negative side, but the detriment of using chemical and
13 poisoning the soil, it's just -- I think it's more, and I
14 don't -- I, it's more detrimental than we realize, I think, to
15 just, just the ecosystem. And I'm not a big preacher or
16 proponent of that. But I know, I just know personally on our
17 farm how different it is not using chemicals. And so I guess
18 I'm not answering your question here.

19 BOARD MEMBER POWELL-PALM: No, no, you are. I, I
20 really appreciate it, yeah. I won't keep you on the hook for
21 it. But I think, you know, calling a spade a spade. I hear
22 that and I really appreciate it. So thank you.

23 MR. FAEH: Well, you are -- I mean you're speaking
24 against the goes here, it's, it's been said, because I know, I
25 know that such a huge industry, we're not going to -- not going

1 to reverse that overnight or I don't know if we ever will
2 reverse it as far as the chemical use.

3 But it sure is -- and I tell people that when I
4 started farming organically, I know for a fact it's healthier
5 for me because I don't have to handle toxic things. And it's
6 healthier for my family because all that -- all those exposures
7 to people who work on the farm, I mean they are definitely very
8 unhealthy for, for the people that actually work with the
9 chemicals. And, and I don't know what the science is about
10 what is actually -- how much that infiltrates into the product,
11 but it has to some.

12 BOARD MEMBER POWELL-PALM: Appreciate that, thank
13 you.

14 CHAIR SMITH: Thanks for showing up today, Andy. We
15 really appreciate your comments.

16 MR. FAEH: Yeah. Thank you for all, all the work you
17 do. I appreciate it.

18 CHAIR SMITH: Yeah. Yeah, you bet. That's great.
19 Okay. Next up we have Matt Keegan, then Mike Appel, then Sydni
20 Arnone. Matt?

21 MR. KEEGAN: Hello, this is Matt Keegan. How are
22 you?

23 CHAIR SMITH: Yeah, doing well. Just state your name
24 and affiliation, and then you can get started.

25 MR. KEEGAN: Hi. Sure, Matt Keegan, Keegan

1 Commodities. I've been a market participant in this organic
2 space for close to 20 years. I've largely spent my career
3 focusing on just global supply of grain commodities for animal
4 feed.

5 So my -- what I'd like to just address is fraud,
6 fraud prevention. You know, I hear a lot on the call about
7 people -- basically, the gist is we want a level playing field.
8 And I hear that whether it's the small grocers or the smaller
9 farmers, or whatever that is, it's across the board. Our
10 objective is the same. We want a level playing field and we
11 want to ensure the integrity of what we're supplying.

12 It's critical. Because at the end of the day, our
13 customers are the consumers. And if the consumers don't have
14 faith in our supply chain, then we have a problem. And
15 currently I think we're all trying to accomplish similar
16 things. But unfortunately I feel like we're all on the boat
17 rowing in a different direction. And I -- and I just feel very
18 strongly that in a lot of ways we're kind of stepping over
19 dollars to pick up dimes.

20 And, you know, we talk about imports and imports get
21 a bad rap. And, frankly, they, they deserve a lot of it. But
22 some of the largest fraud that's been committed in the U.S. has
23 actually been from domestic growers and domestic opportunities.
24 There was one recently in Northern California, a feed mill that
25 finally had its certificate pulled after knowingly committing

1 fraud for decades. The entire marketplace knew it. So lack of
2 enforcement there. Finally, something was done. And they're
3 still unpeeling the onion on this.

4 But my point about this is organic is a process based
5 system. We all know that. So you have situations where you
6 have wind drift, or some cross-contamination, and the system is
7 to allow for some of that. But the system is not to allow for
8 blending solvent extracted meal or expeller meal. And we're
9 seeing that at a tremendous rate coming out of these African
10 countries.

11 The Organic Soy Processors Association was right in
12 what they're trying to accomplish with how they targeted India
13 and tried to create a level playing field. But the end game
14 and the outcome was largely about fraudulent behavior. And
15 that's really what we're talking about.

16 So I feel strongly we need to put some enforcement in
17 place at the courts. It's so simple. We have the precedence
18 for it. We just sample when the cargo arrives. The amount of
19 cargo that we're seeing that has solvent extracted soybean meal
20 in it across the industry is very high. It's better than 50
21 percent. The volumes, the export out of these countries exceed
22 what they are growing. It exceeds capacity. And there's just
23 -- I, I think we're just stepping over dollars to pick up
24 dimes, making this too complicated.

25 Test at the ports. Put it back on the importer.

1 This has been done before. As an importer, myself, I'm asking
2 for it. So let's put it in place. It's, it's not -- it's not
3 terribly difficult. And I feel very strongly about it. So
4 that's all I have for you, today.

5 CHAIR SMITH: Thanks so much. We forgot to start the
6 timer, so anyway it's been around three minutes. Amy has a
7 question for you. Amy, please go ahead.

8 VICE CHAIR BRUCH: Yeah. Matt, thanks for your time
9 today and commenting on our process, really appreciate it. You
10 had mentioned potentially up to 50 percent of products that
11 we're receiving maybe from certain countries test high on
12 residues. What's your -- how do you make that statement? Are
13 you aware of some testing that's been done? And then
14 secondarily as an importer, how do you verify integrity with
15 the products you're bringing in?

16 MR. KEEGAN: Well, so three parts. So first part,
17 for my own testing, from getting samples across the United
18 States, from various supply, various entities, and testing it,
19 myself. So I have that. And I mean even so far as I have had
20 situations where I've received samples that have been sent
21 directly from a supplier to an accredited lab, the supply chain
22 of the sample being sent from the supplier to the lab, I, I
23 touched no part of it. It went from them to the lab. The lab
24 results come. They show positive for solvents.

25 And what you're seeing out of these countries, you're

1 seeing methanol and acetone are the predominant ones that
2 you'll see. You won't seen hexane. And that was -- that data
3 was sent to a certifier. And the certifier basically -- well,
4 not basically. The certifier did nothing about it. So, so I
5 have seen it through my own -- through my own testing. I've
6 seen it through other entities. And so from my perspective,
7 you know, this is a problem.

8 Now when you look at the SOE and you see some of
9 what's trying to be accomplished, many people have been doing a
10 lot of these things for years already. And I've always tested.
11 It's trust and verify. It's critical in what we do. I mean
12 without the integrity, none of us -- like this industry
13 collapses. So maintaining the integrity is, is super critical.

14 But today's marketplace, quality, price, service.
15 The customer wants all three. And the question is do you have
16 an organic cert and what's your price. And so, you know, price
17 is driving a lot of this. Now in fairness, today, there's,
18 there's an overabundance. You have the bird flu across the
19 U.S. You have various issues that have led to more supply than
20 there is demand. That will kind of right itself. A large part
21 of the pricing in the marketplace today is related to that.

22 VICE CHAIR BRUCH: Thank you, Matt. Appreciate it.

23 MR. KEEGAN: Yeah, hopefully I answered your
24 question. I think I addressed it.

25 CHAIR SMITH: One more question for you here. Kim,

1 please, go ahead.

2 BOARD MEMBER HUSEMAN: Thank you, Kyla. Thank you,
3 Matt, for your comments today. Really appreciate your lens and
4 your voice to the market.

5 MR. KEEGAN: Thank you.

6 BOARD MEMBER HUSEMAN: A couple of questions I have.
7 One is CACS has a document out regarding the different
8 procedures and the testing policies that are in place today. I
9 don't know if you've had a chance to review those. Are there
10 any suggestions that you would have to those manuals that we
11 have the questions on? Your, your input would be valuable
12 there.

13 And then secondly, as we know sometimes changes takes
14 time and is hard to, to really get across the finish line.
15 What are some things that the market can do to self-regulate
16 and how do you handle -- you say you have a positive result,
17 how would you handle that as a market participant to help, you
18 know, self-regulate this?

19 MR. KEEGAN: So I think if, if -- as far as the
20 self-regulating, I think what we're seeing is a lot of end
21 users asking for more transparency. Now the problem is it's
22 not necessarily authentic. I would say there's -- and, and if
23 I were to put a percentage on it, I don't know, maybe at 50/50
24 at best. But the, the intent of the end users with wanting the
25 transparency, many it's for integrity, but many is so they can

1 understand the supply chain. And, and don't have the best
2 intentions with that.

3 So, so there is concern I think amongst market
4 participants and being -- and how transparent the many
5 retailers, for example, want to be. They want to protect their
6 supply chains. So, so I think there's, there's a little bit of
7 a struggle with that. I think there's ways to, to address
8 that. But it gets -- that starts to get a little complicated.

9 From my perspective, when we go back to early 2000s,
10 when we had the whole melamine issue, when the cargo came into
11 the U.S. it was immediately put on FDA hold. So cargo coming
12 from China, specifically soybean meal. And so the FDA would
13 put on hold and you'd get a nasty letter that said, hey, you
14 have to destroy this or send it back, or prove to us that it's
15 not tainted with melamine.

16 So you would have a lab come out, pull samples.
17 There was a process. It wasn't terribly complicated once you
18 got it figured out. Pretty straightforward. A third party lab
19 would, would come. They would -- they would pull samples.
20 Those would be submitted. So the integrity of the samples was
21 maintained. Ultimately, the test reports were submitted to the
22 FDA. And then the FDA would either reject or release the
23 cargo.

24 So from my perspective, that process is -- has
25 already been implemented. It's in place. It requires no

1 investment by anybody other than the importers, which the
2 importer should be testing this stuff anyway. So I feel pretty
3 strongly about that. And I think it's pretty straightforward.
4 So hopefully that answers your question.

5 BOARD MEMBER HUSEMAN: Thank you. It does. Just one
6 last quick follow-up. How long does it take? How long is your
7 cargo sitting stateside port for you to get your test results
8 before you release --

9 MR. KEEGAN: Here's how this -- here's how this
10 worked like with the melamine thing. And, you know, and
11 obviously we're talking about kind of two different things,
12 too. Melamine, it becomes like a food safety issue, right? I
13 have had the U.S. Senate ask me. I have sat there and spoke to
14 them and they told me this. With organics, they said -- they
15 said, Matt, listen, we see this as an IP issue, not a food
16 safety issue. And that statement right there is the crux of a
17 lot of this with our government.

18 So when it comes to the integrity, because it's not
19 food safety it falls under a little bit different path. Now
20 with that being said, to specifically answer your question,
21 with the soybean meal that was coming from China with the
22 melamine or with the melamine requirements, you could unload
23 the cargo in a warehouse. You could return containers, if
24 that's how you were shipping the cargo, or if it was by vessel
25 it would go to a warehouse. And once the cargo was staged and

1 ready to be sampled, the sampler would come out and pull the
2 samples. You could pay expedite fees. So oftentimes I would
3 pay to expedite it so that I could get the cargo turned around
4 quicker.

5 So I'm -- this is days. I mean the reality of it is
6 you can have these results within say five business days
7 conservatively. Cargo comes in. Put it in a warehouse. Put
8 it in a bin. Put it somewhere. Test it. Validate it. Which
9 is what we should be doing before we feed it anyway. So that's
10 why I say like everybody's, everybody is on the same boat. We
11 all want the same things. But we just need to get everybody
12 rowing in the same direction. And let's just start with
13 something very simple. And I think this is very simple.

14 BOARD MEMBER HUSEMAN: Thank you, Matt. I appreciate
15 your comments.

16 MR. KEEGAN: Sure.

17 CHAIR SMITH: Thanks, Matt, for being with us today.

18 MR. KEEGAN: Yeah, thank you.

19 CHAIR SMITH: Next up we have Mike Appel, then Sydni
20 Arnone, and then Johanna Phillips. Mike, if you could state
21 your name and affiliation, then you can get started.

22 MR. APPEL: Yeah. My name is Mike Appel, Three
23 Springs Farm in Oklahoma. I just wanted to thank the NSP
24 members. Kind of having a little bit of a -- my, my wife was
25 on the NOSB for several years, so I, I have an intimate

1 knowledge of what it takes to be on the Board and I thank you
2 for that. It's not easy, especially for the small scale
3 farmers on the Board. It, it is very taxing to be on the other
4 end of that for other people that are left to, to do the labor
5 during NOSB times.

6 My comment is quick, short. It's just about organic
7 integrity, about keeping soil within organic. It's -- it was
8 frustrating during my -- during Emily's time on the Board of
9 seeing the, the politics involved, seeing the, the divergence
10 of organics of this more of a reductionist, of just no
11 pesticide, no fertilizer approach versus I would say more of
12 the traditionalist of, of taking care of the land and the soil.

13 And so I would just, you know, just kind of keeping
14 us, you know, in mind, the small scale farmer out there who
15 still work in the soil. And, yeah, that's about it. Just
16 wanted you guys to, to know that we're out here and still,
17 still trying to grow, grow healthy food in soil.

18 CHAIR SMITH: Thanks, Michael, for your comments and
19 for joining us today. It looks like Wood has a question for
20 you, and then Kim. So, Wood, please, go ahead.

21 BOARD MEMBER TURNER: Yeah, sorry, I'm having a hard
22 time doing the hand raising here, so I'm struggling there a
23 little bit. Mike, please give Emily our best and tell her
24 thank you for the work she did when she was on the Board, on
25 the marine materials side of things. We really appreciate that

1 and it's still, still very much on my mind. So that's all I
2 wanted to say, thanks.

3 MR. APPEL: That's great that you bring up marine
4 materials. I know she worked really hard on that. And very
5 frustrating that the NOP has done zilch on it. Again, I think
6 it's, it's politics.

7 CHAIR SMITH: Kim, please, go ahead.

8 BOARD MEMBER HUSEMAN: On behalf of my husband and
9 all the other spouses on the Board, I want to thank you for
10 your time and commitment and supporting the, the understanding
11 of what this takes. So that's my, my first comment. And then
12 I'll follow-up it up with a question, because we're supposed to
13 give questions to you.

14 Can you tell me a little bit more about your farming
15 operations from the perspective of your offput, your -- the
16 logistics behind moving product off your farm to the place that
17 you sell it to and if you have constraints in that regards?

18 MR. APPEL: We, since COVID, we've mostly gone to a
19 CSA model. So we're vegetable farmers. And we predominantly
20 sell at the farmer's market. But now, now it's all CSA. We're
21 actually in the process of developing an app that we have a
22 very different CSA model where it's really driven by consumer
23 choice. Basically, consumers order what they want. We do a
24 delivery once a week. We love it, it's great.

25 I mean it's interesting, we -- organic is important,

1 but we don't really need, need it for our marketing outlet.
2 But we still continue to be certified just because we, we
3 believe in, in the certification. We still believe in the
4 label.

5 BOARD MEMBER HUSEMAN: Okay. Thank you very much, I
6 appreciate your comments.

7 CHAIR SMITH: Nate, please, go ahead.

8 BOARD MEMBER POWELL-PALM: Hi, Michael. Good to see
9 you again. It seems like it was just yesterday we were in D.C.
10 Was wondering if you could speak and take this in any direction
11 you want, how do we get more young farmers in places like
12 Oklahoma? I mean you all are doing the Lord's work out there.
13 And I feel like you've come across something that, you know,
14 really speaks to how do you find, find the right spot, as we
15 talked about TOPP, as we talked about just new farmers in
16 general. What was the piece that you felt made it so you have
17 spent this long and given this much to both farming and
18 organics?

19 MR. APPEL: Thanks, Nate, I appreciate that comment
20 and question. And it's good to see you, too. Yeah, I mean
21 that's something we, we struggle with, too. Because when we
22 started 20 years ago, we -- if you would ask my 26 year old
23 self would there be more organic farmers in 20 years, I would
24 have been of course, it's growing, that's, that's the
25 direction. And unfortunately we're still -- we're still out

1 here kind of by ourselves.

2 I don't -- I wish I had the answer to that, because
3 there is this wave of kind of newer, small scale vegetable
4 farming doing something similar to what we're doing, but they
5 have chosen this, you know, unfortunately this regenerative
6 label route or labeling themselves. There's no certification
7 involved with what they're doing.

8 But that's -- and it's really frustrating us. And I
9 don't -- I don't -- I don't understand it. If anyone could
10 help me understand it, that would be great, because I'd love
11 to, to be able to, to communicate with them the importance of
12 growing the organic movement. But, yes, that, that is
13 something we're still -- we're still trying to figure out down
14 here is like how, how to reach these folks.

15 BOARD MEMBER POWELL-PALM: Well, I'll follow-up with
16 you. But thank you us so much, Mike.

17 MR. APPEL: Thank you.

18 CHAIR SMITH: Thanks for being with us today,
19 Michael.

20 MR. APPEL: Thank you.

21 CHAIR SMITH: Okay. Next up we have Sydni Arnone.
22 And then Johanna Phillips. And then Ron Alexander.

23 MS. ARNONE: Hi, thank you. My name is Sydni Arnone
24 and I am Manager of Government Relations for the International
25 Food Additives Council. IFAC is a global association

1 representing manufacturers and end-users for food ingredients.
2 IFAC supports relisting of citric and lactic acids, and
3 microorganisms, yeast, potassium, and sodium citrates,
4 potassium phosphate, and tocopherols. So both citric and
5 lactic acid are important components of organic production and
6 have broad functionality that makes it essential in many
7 organic foods, and relisting ensures consistency in existing
8 organic offerings and to meet growing demand.

9 The handling subcommittee asked if NOSB should
10 consider removing the addition -- I'm sorry, consider
11 recommending the addition of sanitation to citric acid for
12 applied processes to use in organic version of citric acid when
13 commercially available. It's IFAC's understanding that
14 approximately one percent of the citric acid market is
15 certified organic.

16 Domestically produced citric acid market continues to
17 be nonorganic and the suppliers of certified organic citric
18 acid are from small volume importers. To ensure the continuity
19 of supply for the organic market given the small lines of
20 certified organic and the extensive use of citric acid, IFAC
21 does not support the addition of sanitation.

22 The subcommittee asked for manufacturers to describe
23 how they ensure no excluded methods are used when including
24 enzymes, microorganisms, or yeast into organic formulation. I
25 will let you know that ingredient manufacturers are able to

1 provide statements as to the manufacturing methods used in the
2 production of the ingredient and they do receive requests from
3 end product manufacturers for them, which then they are
4 provided.

5 If excluded methods are used, the manufacturer is
6 responsible for knowing that and is used -- and it is used in
7 communicating -- and is used to communicating that to the food
8 manufacturer. IFAC is also not aware of any ancillary
9 substances that should be prohibited for use due to excluded
10 methods.

11 The subcommittee asked if there are organic
12 tocopherols commercially available. IFAC is not any -- aware
13 of any commercially available certified organic tocopherols.

14 They also asked if there is an adequate considerable
15 supply of non-synthetic tocopherols to meet commercial needs.
16 It is IFAC's understanding that all commercially available
17 mixed tocopherols would be considered non-synthetic per Section
18 4.6 definition. Mixed tocopherols are not transformed during
19 the extraction process. The extracted mixed tocopherols is the
20 same unaltered tocopherols that occurs in oil seed and all
21 processing aids in finished products are not served any
22 technical or functional effect.

23 Lastly, IFAC supports relisting of potassium
24 phosphate and petitions the NOSB to amend it to -- or add the
25 letter S to the end of phosphate, as well as moving for

1 annotation. We ask the subcommittee refer to IFAC's petition
2 and updated submission. Thank you for your time.

3 CHAIR SMITH: Thanks so much for your comments,
4 Sydni. It looks like there's a couple of questions. Wood and
5 then Brian. Wood, please, go ahead.

6 BOARD MEMBER TURNER: Sydni, I just want to make sure
7 I heard you correctly. So when you were saying the
8 manufacturer provides a statement about excluded methods, can
9 you just say more about that? Like what does that -- what does
10 that -- I mean what does that mean? What is that -- what is
11 that based -- what is the information based on and is it, is it
12 effectively an affidavit? And what's the -- tell me more about
13 what that, how that works.

14 MS. ARNONE: You're spot on. It is effectively an
15 affidavit. One of our members pulled up an example that they
16 frequently send out and it pretty much effectively states that,
17 you know, this is not produced utilizing any excluded means.
18 So I can see if we can get a sample of what that would look
19 like, if the Board is interested.

20 BOARD MEMBER TURNER: Sure, I'd love to see that.
21 I'm sure Brian has a good follow-up question here.

22 CHAIR SMITH: Before Brian goes, if you want to pass
23 that to Michelle, she can circulate it to the Board. Thanks,
24 Sydni. Go ahead, Brian.

25 BOARD MEMBER CALDWELL: Thanks, Sydni. My question

1 is just a little bit more about the citric acid. If there is
2 a, you know, commercial availability clause with the
3 annotation, I don't see how it would really, you know, change,
4 change the practices of the industries very much at all. And
5 but it, the point of it would be to encourage more production
6 of organic citric acid. So I'm just, you know, could you just
7 elaborate a little bit more on that?

8 MS. ARNONE: So from my understanding, when it comes
9 down to like certifiers coming in and having to prove that
10 percentage every time of, or how would they prove that it
11 wasn't available for them to utilize, the organic version. It
12 comes because you've added additional steps. There's not --
13 there's less than one percent survival with certified organic.
14 It's a very small amount. However, every time supposed to
15 prove it.

16 BOARD MEMBER CALDWELL: Well, so it sounds like it
17 would just be a little bit of extra effort on, on the, you
18 know, the applicant's part, the certified producer's part. So,
19 I don't know, I'm just -- I'm just putting that, like trying to
20 put a little perspective here. It doesn't seem like it would
21 be a bit ask. And yet it might, it might really push a market
22 that doesn't, doesn't now have any, you know, any or maybe
23 caller market would be a better way to say it. It doesn't have
24 a call right now. So thanks. I appreciate your answer.

25 MS. ARNONE: I can completely understand, you know, I

1 would call it devil's advocate on my side, and on your side you
2 call me devil's advocate, which is good. It's good for
3 conversation. But it's also something to consider with -- I
4 don't think we're fully out of lovely COVID and all the trauma
5 we've all experienced with that, supply chain issues and things
6 like that. So it's also taking that into consideration of
7 supply chain issues, if that might also cause (audio
8 distortion) in the future.

9 CHAIR SMITH: Thanks for your time, today, Sydni.

10 MS. ARNONE: Thank you.

11 CHAIR SMITH: Okay. Next up, Johanna Phillips, then
12 Ron Alexander, and then Bryce Irlbeck.

13 MS. PHILLIPS: Okay. Thank you. I am Johanna
14 Phillips speaking for Strengthening Organic Systems. We're an
15 organic advising firm. I am the Director of Business
16 Development and Technical Affairs. So good morning or good
17 afternoon depending on where you are. And dear Board members
18 and NOP, thank you for the opportunity to comment today.
19 Comments provided are in conjunction with our submitted written
20 comments.

21 Residue testing serves as a compliance monitor and
22 deterrent, monitoring and deterrent against the mislabeling and
23 contamination of organic products. As the market for organic
24 products grows, propelled by trusting the seal, it becomes
25 imperative to keep instruction abreast with current technology

1 and best practices. Advancements in analytical methodologies
2 have enhanced our capability to detect contaminants with great
3 precision in various stages of the supply chain.

4 While useful, current guidance on residue testing
5 fails to capture those advancements. This gap undermines our
6 ability to effectively deter fraud and guarantee the integrity
7 of organic products. We propose specific upgrades to enhance
8 the rigor and scope of NOP's residue instructions.

9 Specifically, for NOP 2610, sampling procedures
10 residue testing, this instruction is vague in several areas
11 such as sample size, type, collection methods across different
12 product types including crops, livestock, and processed good.
13 We advocate for detailed science-based sampling framework that
14 reflects the diversity of the organic sector and aligns with
15 established best practices.

16 For NOP 2611, instruction for laboratory selection
17 criteria, and the associated guidance NOP 2611-1, prohibited
18 pesticides for NOP residue testing, these instructions focus
19 narrowly on pesticide residues. We suggest expanding the
20 instructions to include other synthetic substances, ensuring
21 laboratory selection is inclusive of other prohibited materials
22 and methods. We support established re-review timeframes to
23 ensure that current information is always included in the
24 instruction.

25 For NOP 2613, responding to results from pesticide

1 residue testing, this instruction is a valuable resource and
2 has several opportunities to be enhanced. We recommend
3 establishing concrete instructions for determining an action
4 level that does not penalize operations impacted by
5 unintentional drift or contamination more stringently in
6 commodities without intolerance established. For concentrates
7 or dried herbs, we suggest a concentration factor be
8 established to reduce reasons to avoid testing and to provide
9 fair market for all products.

10 To maintain the credibility of the organic label and
11 protect consumer confidence, it's essential that our residue
12 testing procedures evolve not only to catch fraud, but to deter
13 fraud. Updating the NOP instructions is necessary to this goal
14 and to maintain consumer confidence in the label. SOS is
15 committed to collaborating closely. Thank you so much for your
16 time.

17 CHAIR SMITH: Thanks, Johanna. Any questions for
18 Johanna? Oh, I see a couple. All right, Amy.

19 VICE CHAIR BRUCH: Hey, Johanna. Thank you for
20 joining us, today. Thanks for SOS's comments, too, especially
21 on the residue testing, very informative information we glean
22 from there. I'm trying to balance lots of public comments in
23 this arena. And as we look at the guidance documents and
24 updating them, and potentially, you know, expanding them to
25 include more than just pesticide residues, as some commenters

1 had mentioned we need more information on that.

2 We look at some commenters were saying we need
3 prescriptive type information in these instructions documents.
4 And others were saying we need, you know, the thought process.
5 So I kind of struggle sometimes with the thought process
6 because we don't always know what we don't know. So where do
7 you lie in that recommendation for the Board with the
8 prescriptiveness, keeping things up to date, and balancing kind
9 of just the, the teaching of the knowledge?

10 MS. PHILLIPS: That is such a good question, Amy. So
11 I will say where I land in that conversation about
12 prescriptiveness is it really depends on the resources of the
13 entity utilizing the instruction. So my suggestion would be
14 that there be adequate explanation and direction to resources
15 with an explanation that if like for a certifier, for example,
16 might develop internal policies, you know, much like certifiers
17 outlying for operations that they can supply alternative
18 solutions. Certifiers have the opportunity to propose
19 alternatives to NOP in their instructions and how they plan to
20 comply with the requirements.

21 What I think is really critically missing from these
22 NOP instructions is that certifiers lean on these not only to
23 help operations understand what the requirements are, but also
24 to help guide their approach and process. So when they're too
25 limited in approach, then you miss all of these separate

1 categories of products and potential contaminants in the
2 enforcement.

3 VICE CHAIR BRUCH: Thank you. I appreciate that.

4 CHAIR SMITH: Kim, please, go ahead.

5 BOARD MEMBER HUSEMAN: Thank you. And thank you for
6 your comments. My question is around labs and the ability for
7 the labs to be able to provide results in a timely fashion.
8 What is your -- can you give us just a little bit more lens in
9 your thought process around the timeliness of labs for the test
10 results?

11 MS. PHILLIPS: Yeah, so I do -- I'll qualify this a
12 little bit to say that until January I was in the certification
13 and regulatory enforcement space, so I'm, I'm a technical
14 advisor now, and so I'm out of that space. So my experience is
15 I've, I've seen and reviewed hundreds of lab results. And I
16 used to work for the State of Idaho, also.

17 Lab timeliness is a non-issue from the standpoint of
18 like if you're done the prework and you understand where you
19 would send a sample to based on what you are looking for in
20 your sample, and having it properly prepared so that the lab
21 can accept the sample and that it's in an adequate volume to do
22 what they're looking for, labs typically turn things around in
23 a really timely manner and they have established timeframes.
24 So I don't think there is a timeliness issue across the
25 certification space on getting results.

1 If, if we're talking from the producer standpoint and
2 self-testing, I think it's possible that there could be delays
3 there. But I wouldn't imagine that labs give a different type
4 of service based on what their customer is using it for.

5 BOARD MEMBER HUSEMAN: Thank you very much. I
6 appreciate all the work that you guys do over at SOS.

7 MS. PHILLIPS: Thank you.

8 CHAIR SMITH: Thanks, Johanna. I saw Nate had his
9 hand up, but then he put it down so maybe Amy asked his
10 question. Nate, are you good?

11 BOARD MEMBER POWELL-PALM: I'm good. I just -- I
12 mean to fight the urge to comment, I just really appreciate you
13 saying that, Johanna, that these are professional operations.
14 They're going to flip these test results around. We just need
15 to make sure inspectors are well-trained to be collecting the
16 results. So thank you so much.

17 MS. PHILLIPS: Yeah, thank you.

18 CHAIR SMITH: Okay. Thanks, Johanna. Appreciate
19 your time today.

20 MS. PHILLIPS: Thank you.

21 CHAIR SMITH: Okay. Ron Alexander, you're up next.
22 Then we have Bryce Irlbeck, then Emily Moyer. Please state
23 your name and affiliation, and then you can get started.

24 MR. ALEXANDER: Okay. We're not going to use my
25 slides?

1 MS. ARSENAULT: I was just going to say --

2 CHAIR SMITH: Sorry, my bad.

3 MR. ALEXANDER: No problem at all. Thank you for
4 that. I'll move through them very, very quickly. There's only
5 a few. My name is Ron Alexander. I have my own compost
6 consulting company. I was also on the U.S. Composting Council
7 Board several times. My comments are related to modernizing
8 the NOP regulations. Next.

9 This is who I am. My wife and I have also worked in
10 listing hundreds of products through OMRI and CDFR. We are
11 known for not liking teats and used to run the national compost
12 quality program for 10 years. Next, please.

13 So I just wanted to first just reiterate the obvious
14 and that was compost has become a staple for our -- for this
15 industry. It's an important product now and I really hope the
16 efforts that we do here together improve the review process,
17 product quality without unduly raising the cost of the products
18 or the process to compost end-users. Next, please.

19 These are my general comments. I'm just going to go
20 through them very quickly. You can go to the next one, please.
21 My first main comment is the compost definition with the
22 regulations are somewhat outdated. There is a bunch of process
23 information and they're probably not necessary at this point.
24 This is the AFCD definition that's being used by the 50 state
25 departments of ag by the regulators of soil amendments. This

1 is one that I would suggest, you know, the Board evaluate.

2 Next, please.

3 Also, upfront C/N ratios requirements into -- in the
4 regulations and the process are somewhat outdated. C/N ratio
5 for completed products is something that could be talked about.
6 But upfront C/N ratios are seen as best management practices
7 now and not requirements at all, as far as large scale
8 composting.

9 The other thing is having alternative sanitization
10 standards, I think, is very, very important moving forward.
11 Just a typical two different, three different types of times
12 and temperature and turns for compost. It's a big old industry
13 and I think we need more ability to prove that we can sanitize
14 the product that we can. Next, please.

15 It's also important that we continue to have access
16 to craft paper bags. I know that one of the things that we
17 looked up -- looked at potentially is the inks used, which are
18 primarily pretty darn clean inks, today. But there -- it must
19 be noted that craft paper bags are really important for
20 feedstock collection. Being able to write on the bags is very
21 important to provide instructions and reduce inner
22 contamination. So I think that that's an important thing I
23 just want to mention. Next one, please.

24 And then finally I'm a horticulturist by training, a
25 plant and soil scientist. Again, I ran the national compost

1 testing program. I preach quality. I am very concerned about
2 synthetic contaminants in compost and the feedstocks. But we
3 have to really be hard and very, very tough to develop
4 standards. And we have to be very, very cautious, because if
5 we do it incorrectly we can really negatively impact product
6 availability. That's all.

7 CHAIR SMITH: Thanks, Ron.

8 MR. ALEXANDER: And then finally if there's any
9 questions I can help you with. Thank you.

10 CHAIR SMITH: Yeah, perfect. Thank you so much.
11 Looks like you have a couple of questions here. Nate, please
12 go ahead.

13 SECRETARY LEWIS: Hey, Ron. Thanks for coming today.
14 I had a couple of questions. One is do you see any downsides
15 or is there any risk to eliminating the C to N ratio entirely?
16 What's the -- what's the con on that pro/con list?

17 MR. ALEXANDER: Right. The, the front side of the
18 thing for feedstocks up front I don't see a great risk, okay.
19 I don't see a great risk. Most people understand if you're
20 going to put a compost into the soil, we have to be at a 20 to
21 1 or a 25 to 1 C/N ratio to go in the soil. For a mulch
22 product, those numbers can go pretty sky high, frankly, and not
23 be overly deleterious.

24 But I, I think the front end feedstock C/N ratios is
25 probably old science and can go. You can always discuss C/N

1 ratio I think on the back end for stuff specifically that goes
2 in the soil. I did a lot of work in England for 10 years.
3 They showed the research when they have high C/N compost going
4 in the ground, literally no nitrogen gets to the plant.

5 SECRETARY LEWIS: Fair enough, appreciate that. And
6 then as a follow-up, one of the contaminants in compost that
7 I'm most concerned about and I think probably the Board members
8 and stakeholders are going to get sick of me talking about
9 this, but I'm trying to have everyone channel their inner fruit
10 sticker. I understand that fruit stickers remain a perennial
11 problem in compost, organic or otherwise. What do you see as
12 an opportunity for organic to lead in eliminating that
13 particular piece of garbage that comes in on pre-consumer and
14 post-consumer food waste?

15 MR. ALEXANDER: Yeah. And I think, I think most of
16 the contamination I see in the industry is from post-consumer
17 materials. Pre-consumer is, is much more homogeneous and
18 clean. I do think some of the, the sticker scare is, is
19 somewhat overblown, though it's mind-blowing to me that we're
20 using these stupid things. And we have to make these things
21 out of non-synthetic materials, I mean. And I, I argue we can
22 do that, you know what I mean?

23 So I don't have a great answer for that. I could say
24 the materials can be screened out, but they can and they can't.
25 If they shrivel up and get small, they may go through a screen.

1 I will tell you that on the West Coast, especially California
2 where food waste contamination is huge, we're seeing people
3 screen at one-eighth and one-quarter inch just to get clean
4 compost. And realistically there's few places around the
5 country that that's financially realistic, because if the
6 compost is wet, you can't screen it that fine. So this is a
7 huge dilemma. It's a huge dilemma. It will be our dilemma for
8 a while, yeah.

9 SECRETARY LEWIS: Thanks. Thanks, Ron, I appreciate
10 you being here.

11 MR. ALEXANDER: Yeah, sure.

12 CHAIR SMITH: Mindee, please, go ahead.

13 BOARD MEMBER JEFFREY: Yeah, thanks, Ron. Nothing
14 hurts my feelings more than watching fruit stickers come down
15 in my sifted pile of compost, so really feel the pain of that
16 one. I read in your comment that you are not generally
17 supportive of the BPI petition. And I was wondering if you
18 could unpack that for me a little bit. Is it that it's an
19 infrastructure problem, it's screening because we can't really
20 separate compostables from plastics, or is it a concern for how
21 those constituents end up in finished compost?

22 MR. ALEXANDER: Well, I think I, I really want to get
23 deeply into it. There are synthetic materials in those
24 products, so unless there is an exemption for those specific
25 materials I don't know how you get around that. But generally

1 in the composting industry, very sadly I'm supportive of the
2 concept, but these materials are typically screened out with
3 plastic and land silt. Any of the materials that are 3D in
4 nature, not film, it's really hard to get them to compost fast
5 enough during a typically composting process. And it pains me.
6 It pains me. But it's, it's a difficult dilemma. It's a
7 difficult dilemma.

8 CHAIR SMITH: Thanks, Ron. Brian, please, go ahead.

9 BOARD MEMBER CALDWELL: Yeah. Thanks, Ron, really
10 appreciate your comments. In that definition that you put up,
11 I, I just want to make sure I got it right. But it described
12 the process of composting, but it said nothing about the
13 inputs. Am I right? So that sort of anything could be
14 composted as long as it goes through that process?

15 MR. ALEXANDER: Well, anything that's, that's -- I
16 mean we basically with this definition, which I helped develop,
17 by the way, all honesty we try to be feedstock agnostic. I
18 have no issues with plant and material-based materials, you
19 know.

20 I'm not trying to pass through any synthetic
21 materials. I'm just stating that we try to -- we try to
22 develop a defensible -- a defensible and logical, something
23 that is both scientific and commercial when developing this
24 thing for AFCO. Really, the goal is to catch products that
25 aren't compost and making sure they can't call themselves

1 compost with that definition.

2 BOARD MEMBER CALDWELL: Yeah, thanks, because
3 definitely one of the big issues that we're working with here
4 is, is what the feedstocks can be. So, you know, great. Okay,
5 thanks.

6 MR. ALEXANDER: Listen, I have no issues with most of
7 everything you guys do as far as feedstocks. We have, again,
8 we've put hundreds of products through. Okay. Thank you for
9 your time.

10 CHAIR SMITH: Thank you so much for your comments,
11 today.

12 MR. ALEXANDER: By the way, if there is anything that
13 myself or the U.S. Composting Council can do to support your
14 efforts, we would be happy to do that.

15 CHAIR SMITH: Thank you.

16 MR. ALEXANDER: Sure.

17 CHAIR SMITH: Okay. Next up, we have Bryce Irlbeck.
18 Then Emily Moyer and then Zach Porter.

19 MR. IRLBECK: I'll start the video, there we go,
20 perfect. Good afternoon, everyone. My name is Bryce Irlbeck
21 from Western Iowa. I'm an organic producer in corn, and
22 soybeans, and alfalfa. I'm also founder of the business
23 AgriSecure that helps other producers digitally work through
24 the certification process. And we currently do about 50,000
25 acres or 30 producers, so pretty heavily invested in the

1 organic industry.

2 I came here today to discuss two topics, the first
3 being the importation of organic grains. The second is of the
4 organic transition initiative. I'll start with the organic
5 grains importation. I just want to make it very clear we are
6 losing organic farms and organic acres at a pretty incredible
7 rate out in the country. And it's really coming from the
8 importation of grain. And I'll get into a little bit of
9 sustainability.

10 We're importing from countries like Russia, Turkey,
11 and Africa, and one of those countries we've had billion
12 dollar -- billion dollar companies pull out for ethical and
13 moral reason, yet we're still importing. Another country that
14 we have a very difficult time of food insecurity, yet we're
15 still importing from them. And it really comes to the gut
16 punch of the farmer on those organic importations.

17 And then we added in the extra rigorous certification
18 process, which I have no, no problem with. But we didn't
19 really curb any of the grain importation or imported across
20 seas as well.

21 And bringing back the sustainability side of this is
22 we have a lot of grain coming in. The farmers are not
23 sustainable any more. We have corn and soybean rotations as
24 our last chance or you don't have small grains because most of
25 the country that imports it in is not sustainable. Our import

1 companies are not sustainable. The support groups are not
2 sustainable. And the services that we need to, to have this
3 organic ecosystem are not sustainable. And once they leave,
4 they're never coming back. That's the important thing that I'd
5 like everybody to think about.

6 We don't have two years to fix this, we have months
7 before this thing comes down and doesn't work for anyone. And
8 then the call to action is really we need to do what the
9 organic U.S. producer has to do, bring that across seas for the
10 testing and everything, as well as testing ships that come
11 over, as many people have talked about before. I won't go into
12 details. And make it the same as the U.S. grower has to go
13 through, because I really don't believe that's, that's
14 happening right now.

15 With the last 45 seconds, I'll talk about OTI,
16 because I think it's important. The OTI plan was great. And
17 it's a great idea to, to work with organic growers and promote
18 the organic industry. But that was about all that was great
19 about that was the idea. The local level USDA people worked
20 very hard. We worked with them. They are very good people.
21 They had zero information, exactly zero information on how the
22 program worked. They had exactly zero information of how to
23 make this go through.

24 And the goalpost of cleanliness has changed quite a
25 few times throughout the last three months of process. And we

1 still don't know where it is, today. And we're in the field
2 planting. So I -- it is a disaster from the national and state
3 levels. I want to iterate that the USDA level was good, but it
4 still looks like they are changing the goalpost and we won't
5 even get to utilize the program this year.

6 CHAIR SMITH: Thanks, Bryce, for your comments.
7 Looks like you have a question from Allison. Allison, please,
8 go ahead.

9 BOARD MEMBER JOHNSON: Thanks, Bryce, for being here
10 and bringing up the organic transition initiative. Can you
11 tell us a little bit more specifically about who you're running
12 into challenges with at the local level? Is it NRCS, or FSA,
13 or which type of office, and what program you were trying to
14 apply for.

15 MR. IRLBECK: Yeah. So the OTI, organic transition
16 program. And we weren't running into trouble at the local
17 office. The local people are very helpful. They just had zero
18 information about the entire program. And we, we have three
19 different counties that we are in so we -- and two states that
20 we worked with probably 17 different people. Zero information
21 that those people were given from the top of the program.

22 So we would sign up and then the local people thought
23 we were good. We had all our information. The State came back
24 and said, no, you're missing all this information that they
25 never told us we needed. You're kicked out of the program. We

1 fought that for 15 days, probably 20, 30 meetings, and they let
2 us back in. And then they kicked us out again for some
3 technical reason. So from our standpoint, it really feels like
4 they are trying to make that program not utilized.

5 BOARD MEMBER JOHNSON: Was this the NRCS funding?

6 MR. IRLBECK: Correct.

7 BOARD MEMBER JOHNSON: Yeah, okay. Really helpful to
8 know. Thank you for bringing those specifics.

9 MR. IRLBECK: I have all the emails, too, and
10 correspondence. We kept track of it, if you guys want to see
11 it.

12 BOARD MEMBER JOHNSON: Yeah. I'm sorry you went
13 through that. I'm hoping things will get easier as the, the
14 program matures. But, yeah, it's so frustrating when you have
15 this opportunity and you're not able to take advantage. So I
16 appreciate you bringing it.

17 MR. IRLBECK: Yep.

18 CHAIR SMITH: Nate, please, go ahead.

19 BOARD MEMBER POWELL-PALM: Bryce, when you were
20 saying sustainable, you mean economically sustainable, correct?

21 MR. IRLBECK: Yeah. I mean everything has to be
22 economically sustainable to keep it -- keep people in it, to
23 provide that food, to provide that rotation, and provide the
24 outcome of organic.

25 BOARD MEMBER POWELL-PALM: And one follow-up on the

1 823. You're able to grow the one ton of biomass per acre for
2 cover crops because you're both irrigated and you're in a rain
3 zone than say, Michael, who you heard from earlier, and yet
4 you're still having trouble getting this through, correct? Am
5 I hearing you right?

6 MR. IRLBECK: Correct. For, for the -- so clarify
7 that question, Nate, please?

8 BOARD MEMBER POWELL-PALM: Sure, yeah. So as part of
9 823, the requirement that you produce one ton of biomass for
10 your cover crops, that wouldn't be a problem for you guys.

11 MR. IRLBECK: We didn't even get that far.

12 BOARD MEMBER POWELL-PALM: Got it, okay.

13 MR. IRLBECK: I mean we, we -- it was -- it's they
14 didn't even know that.

15 BOARD MEMBER POWELL-PALM: Yeah.

16 MR. IRLBECK: And I want to -- I want to reiterate
17 the local people at the USDA and NRCS have been great. It's
18 not their fault. It's coming from the top. The top never told
19 them anything about the program. And still to this day it's
20 been difficult to get much out of.

21 BOARD MEMBER POWELL-PALM: And just to finish up,
22 you, both for your operation, as well as other farmers feel
23 like this is a program that would benefit them and would be
24 used if we had some more local education and support?

25 MR. IRLBECK: Definitely. I think you promote a lot

1 of organic transition, as well as learning, and what it does is
2 it, it takes the, the risk -- it mitigates the risk. It
3 doesn't take it completely away. But when you transition
4 organic, there is a good chance you're going to lose money.
5 And it helps you try things, do things that might help you in
6 the future. So it's just not a program that pays for this
7 year. It pays for you to learn and understand how to do things
8 right, instead of getting into it and trying to get through it.

9 BOARD MEMBER POWELL-PALM: Thank you.

10 CHAIR SMITH: Amy, please, go ahead.

11 VICE CHAIR BRUCH: Yeah. Bryce, thanks for your
12 time, today, and supporting the residue testing. I wanted to
13 ask you on the 823, I asked Michael this earlier, are you aware
14 of any producers that were awarded an 823, the OTI EQIP 823?

15 MR. IRLBECK: I am not. I was told we were one of
16 very few that signed up. So it's very perplexing that -- and
17 we know the other people that signed up. But I don't know if
18 the program actually exists. I'm going to put it that way.
19 It's yet to be determined.

20 VICE CHAIR BRUCH: More to come. Thank you, Bryce.

21 MR. IRLBECK: Yep.

22 CHAIR SMITH: Thanks for being with us, today, Bryce,
23 and for your comments.

24 MR. IRLBECK: Thank you. Next up, we have Emily
25 Moyer, then Zach Porter, and then Tony Michaels. If you could

1 just state your name and affiliation, and then you can get
2 started, Emily.

3 MS. MOYER: Yes, good afternoon. Hi, everyone. My
4 name is Emily Moyer. I'm the Vice President of Regulatory
5 Compliance and Global Food Safety at International Fresh
6 Produce Association. So I first want to thank you as always
7 for the opportunity to provide these remarks as the Board is
8 conducting your sunset review of organic materials and, and
9 reviewing your spring discussion documents.

10 IFPA represents over 2,500 companies from every
11 segment of the fresh produce and floral industry. That
12 includes over 500 companies who are directly involved in the
13 production of organic fruit, and vegetables, and flowers. My
14 comments are also representative of our IFPA organics
15 committee, which is made of 24 produce industry professionals
16 who represent again a diversity of organic produce commodities,
17 operation types, regions, and experience.

18 A number of materials being reviewed next week are of
19 great importance to our organic members, for which we have
20 provided support in our written comments. For the interest of
21 time, I am focusing my comments today on the carbon dioxide
22 petition proposal, as well as peroxyacetic acid.

23 We do understand the crop subcommittee expressed
24 hesitation in approving a petition filed in 2020 that would add
25 carbon dioxide to the National List for use as a plant or soil

1 amendment under Section 205.601(j), and understand the
2 limitations of that petition. And ultimately the motion was
3 not passed. IFPA members have found that CO2 that comes from
4 natural growth production is especially important for
5 controlling production systems on farms. It has especially
6 been valuable for controlled environment agriculture, because
7 relying on the ambient CO2 levels is not as precise.

8 TA production does continue to grow and provide
9 opportunity to supply fresh grown organic produce year round.
10 But in order to optimize these production methods, there are
11 times when the CO2 levels need to be increased. So as
12 standards for these types of growing operations are clarified
13 hopefully sometime in the future, IFPA does encourage the Board
14 to evaluate or reevaluate the necessity, necessity and
15 compatibility for the use of CO2 as a plant or soil amendment.

16 Finally, just in regard to peroxyacetic acid, IFPA
17 and, and myself as a food safety professional cannot overstate
18 its necessity for sanitizing of equipment and tools in fresh
19 produce harvest and handling environments. It is one of the
20 most common antimicrobials used by our members for this
21 purpose.

22 PAA is also used as an antimicrobial agent in produce
23 wash water to prevent cross-contamination in washing tanks and
24 for the cleaning of irrigation pipelines. If PAA wasn't
25 available, we worry that the production of safe organic fresh

1 produce would be substantially impacted, hence our strong
2 support.

3 So thank you again for the opportunity to present
4 oral comment. And as always we appreciate this work.

5 CHAIR SMITH: Thanks so much. That buzzer goes off
6 and every time, even though I'm like looking on it, it like
7 shakes me. Anyway, Logan, please, go ahead.

8 BOARD MEMBER PETREY: Hi, thank you. Thanks for your
9 comments, especially on the carbon dioxide. We haven't had a
10 lot of -- a lot of comments, you know, against or support until
11 now of the CO2 at this listing. And I just want to mention
12 also in the petition, it is actually extremely vague for that
13 listing as a crop and soil amendment giving it's really no
14 information.

15 We were waiting until actually the TR is the only
16 thing that provided any information of its use, its need, its
17 importance for that. The petition really, really focused on
18 using it for irrigation water, acidifying that. And so that
19 really directed the Board, you know, kind of forcing something
20 else. Even though it was listed in the petition, there was not
21 a lot of information in it.

22 Saying that, just curious what -- do you know what
23 methods or what materials are being used for that in organic
24 greenhouses currently, since CO2 is not allowed?

25 MS. MOYER: So I don't -- sorry? I don't personally

1 know the production methods, but it is something that I can
2 speak with our members and get a little bit more details on.
3 And I appreciate your explanation as to the petition, because I
4 understand just in reading through that discussion document the
5 limitations. So that's something I think we can certainly, you
6 know, for our members get better information that would be
7 needed on, on that side for the soil amendment and planting
8 limit portion.

9 BOARD MEMBER PETREY: That would be great, because
10 it's not, you know, the material itself that we're really
11 nervous about, it's the use and we don't understand that. So
12 we're really just limited to the information on the TR without
13 anybody coming on and commenting how they would use it or how
14 it's needed.

15 We haven't heard from any greenhouse user or any
16 indoor -- nobody has come on and said they need that. So if it
17 is that needed, we would love to hear from people who would use
18 it, you know, more and really help convince us that's there,
19 you know, that's a possibility. It's just that was what we
20 were working with.

21 And we could see from comments from PCS, they kind of
22 mention the same thing. So I'll encourage them to try to get
23 growers or, or just more information for us. So thank you for
24 your time. I appreciate it.

25 MS. MOYER: I appreciate it. I can absolutely make a

1 note for that for the fall.

2 CHAIR SMITH: Thanks so much, Emily, for your
3 comments today.

4 MS. MOYER: Thank you.

5 CHAIR SMITH: Okay. Next up, we have Zach Porter.
6 Then Tony Michaels. And after Tony, we have Hilary Near.

7 MS. ARSENAULT: Kyla, I think Zach is not on the
8 phone with us. We're going to swing back at the end of the day
9 to see if he was able to join.

10 CHAIR SMITH: Oh, yep, that's right. I saw that
11 note. Sorry about that. Tony Michaels, then you're up next.
12 And then Hilary Near and then Harry Rice.

13 MS. ARSENAULT: I don't believe Tony is with us,
14 either. Let me check one more time.

15 CHAIR SMITH: Tony, I see --

16 MS. ARSENAULT: On the phone?

17 CHAIR SMITH: Yeah, is on the phone. Oh, maybe not
18 sure if on the phone, but --

19 MS. ARSENAULT: Just one second. I'm not seeing his
20 phone number in the four phone numbers we have on the call.

21 CHAIR SMITH: Okay, thanks, Michelle. We will circle
22 back to Zach and Tony. Then we have Hilary Near and then Harry
23 Rice. And then we'll take a break. Hilary, if you could just
24 state your name and affiliation, and then you can get started.
25 Thanks.

1 MS. NEAR: Hilary Near, Commercial Zero Waste Senior
2 Coordinator at the City & County of San Francisco, our
3 environment department. So I'm here, thank you, Board, for to
4 comment specifically regarding the definition of compost, which
5 would result in the inclusion of certified compostable foodware
6 and bags as a feedstock, and compost lodge working operations.

7 In the City and County of San Francisco, we've
8 offered compost separated organic selection for over 25 years
9 to our population of over 80,000 people, many of whom live in
10 multi-family housing, almost two-thirds we estimate. And the
11 especially compostable plastic liners and bags have been really
12 important to capturing those food scraps generated from
13 independent apartments down to collection points.

14 And we have actually gone so far as to require
15 everyone, meaning all businesses, all residents have to have
16 access to it, and have to participate in organic selection. We
17 have very, you know, significant results related to that. We
18 also really rely on these associated food contact materials and
19 foodware. We have regulated those to the amount of, you know,
20 requiring packaging to be reusable, preferred, and then recycle
21 or compostable with the aim of achieving zero waste and
22 capturing more of the organics generated in our city.

23 It means that -- our city's density means that we
24 have to capture food scraps in order to meet our climate goals.
25 We can't rely on sort of yard debris or leaf collection. We

1 have to go after that food scraps. And the certified
2 compostable products are a really important piece of closing
3 the loop on them.

4 So it has also been obviously, as Ron alluded, we do
5 have high contamination. It's very hard to educate everyone,
6 even with the vast investment, you know, millions of dollars
7 and many multi-legal staff to show for it. And we do see that
8 these products are really important to reducing contamination
9 of conventional plastics. People have access, for example, to
10 conventional -- or, excuse me, compostable produce bags, which
11 every grocery store has to provide with their sometimes organic
12 produce. Any produce should be sold in those that residents
13 can use then for their close the loop and put them in their
14 green cart.

15 In closing, I'll just reiterate that food guidelines
16 and rules that effectively limit composters from taking these
17 materials create further barriers for who has got collection
18 programs. And we're really asking the National Organic Program
19 to consider this comprehensive view of attempting to close the
20 loop, and the role of these products in allowing especially
21 organic farming in California to continue and use food scraps
22 that a dense community like San Francisco produce, to buy back
23 food into our city. So thank you again. And admire your work.

24 CHAIR SMITH: Thanks for your comments, Hilary. It
25 looks like we do have a question. Nate, please, go ahead.

1 SECRETARY LEWIS: Hi, Hilary, thanks for your
2 comments. I'm curious if you can provide some insight into
3 your experience with the non-film compostable products and
4 whether those, like forks, clamshells, whatever, so anything
5 beyond the bag, and how those can help or don't help this waste
6 reduction goal. I understand the, the bag consideration.

7 MS. NEAR: Yeah.

8 SECRETARY LEWIS: Similar to what we heard from Ron
9 about the craft bags or leaf pickup and that kind of stuff.

10 MS. NEAR: Yes.

11 SECRETARY LEWIS: But I'm curious about like the
12 forks and the clamshell, I mean all this other single-use
13 stuff. Does that move the needle in your mind or is it really
14 just about the bags?

15 MS. NEAR: We're, we're very attached to the bags.
16 So I think that's -- I'm glad you picked up on that nuance.
17 Bags are really important. And although there is still a lot
18 of greenwashing, we're really hopeful in California, the
19 labeling piece, we have additional policy that will go into
20 effect to limit any, similar to Washington, any use of the
21 green film outside of -- and the labeling of compostable
22 outside of certified compostable. So we're confident of that.

23 Obviously, your all's decision on this piece is
24 really key to the -- to the policy picture and the landscape
25 here in our options. To answer your question, many businesses

1 are also very attached to the convenience. I mean we saw a ton
2 of backsliding around COVID. So they like if they're offering
3 food conveniently to go, they get less contamination if they're
4 able to just choose all compostable, right?

5 It helps capture, that's the story and you've heard
6 it probably reflected EPI, biocycle, many of our -- and our
7 producers highlight that. And we have seen that performance
8 for places like our venues, Chase Center, for example, Oracle
9 Park. They invest in those and then they can do less sorting
10 on the back end because our hauler does process, process those.

11 We're also though very much a testing ground, because
12 our customers will pay the premium for compostable or green
13 products. So we do get a lot of greenwashing. And I would say
14 I've stood at those piles at our large compost facility and the
15 things that don't make it through are the bio-base label or
16 the, you know, not to name a brand, but, yeah, tear-wear that
17 are not actually certified compostable.

18 And we've seen probably most recently in the
19 composting contortions really comprehensive study of 10
20 facilities that across the board, whether liners or a different
21 thicker resin, they perform. And it's sometimes the labeling
22 issues I think that, that end of issue that Ron mentioned where
23 there's just so much conventional plastic that they have to
24 screen to get that out. And the machinations don't distinguish
25 between whether the PLA cup or a PET polypropylene cup. So

1 that's the thing, it's the same issue at our facilities.

2 CHAIR SMITH: Thanks, Hilary. Brian, please go
3 ahead.

4 BOARD MEMBER CALDWELL: Hi, Hilary. Thanks for your
5 comments. And, yeah, I think your goals of, of your program is
6 really laudable. But we have a composting facility near us. I
7 live near New York that has basically two streams. One does
8 not include food waste and that is allowed to be sold as, as to
9 organic operations. And then there is another stream that has
10 food waste that is not sold as organic. So what, what is
11 the -- I mean what would be the practical impact of just of you
12 guys just, you know, saying, well, this is great, we've got
13 this good compost stuff, but it's not going to be sold to
14 organic farms, but could be used by landscapers or whoever else
15 wants it.

16 MS. NEAR: Yeah, thanks for that, Brian. Two
17 thoughts. One is that we -- our composter did invest in that
18 at our request. So they need significant investments to keep
19 separate piles to supply to, you know, farms and, and customers
20 who wanted that organic certification, and still meet our, our
21 request to process our material without, yeah, with compostable
22 products which were not -- are now allowing synthetic. So we
23 did do that.

24 We've since sort of consolidated operations and I
25 think, as Ron mentioned, like financially it's just not

1 possible for our facilities to keep those dual piles. I think
2 you may have seen comments from NAFA Recycling, which is in our
3 neighborhood as well. To that point, they do keep dual piles
4 and they would really like the option to combine them, to serve
5 those needs.

6 Given effectively the definitions of composting, you
7 know, could use some revision to align with the ASCM standards
8 and the fact that those materials are completely transformed
9 through the composting process. So I'm hoping the NOP
10 considers that so that composters have the option.

11 And then the second thought was that our --
12 effectively, our state law will not -- we will not have that
13 option. So if you all don't include these products that meet
14 the ASCM standard as an allowed synthetic, it will close the
15 loop. It will -- we will not be allowed to accept those
16 materials or process them in California in 2026.

17 BOARD MEMBER CALDWELL: So the -- I'm sorry, just to
18 follow through on this.

19 MS. NEAR: Yeah.

20 BOARD MEMBER CALDWELL: You're saying that the state
21 law includes a requirement that it be allowed for organic in
22 it?

23 MS. NEAR: Yes. That was -- yes, that's what
24 happened. AB1201 defined and that's obviously one of the
25 reasons BPI worked hard to get this in front of you all and

1 demonstrate the value of some certified compostable products,
2 including them and feeding organic farms.

3 BOARD MEMBER CALDWELL: Yeah, that -- okay, that
4 I -- that piece explains a lot. And, of course, just thinking
5 out loud, of course, we, we have to try to do what we think is
6 best for the entire country. And so it goes beyond state law,
7 but, you know --

8 MS. NEAR: Of course.

9 BOARD MEMBER CALDWELL: That clarifies. Thank you
10 very much.

11 MS. NEAR: Yeah, I recognize the challenge. And,
12 yes, respect all of the -- all that you're balancing.

13 CHAIR SMITH: Allison, please go ahead.

14 BOARD MEMBER JOHNSON: Thanks so much for being here,
15 Hilary. Obviously, you've done a lot of work on the action to
16 get more municipalities composting and make sure that we are
17 closing that loop. So I appreciate you taking the time to show
18 up somewhere that isn't in your usual orbit to help all of
19 these pieces work together.

20 And I'm curious do you have, to a virtual room full
21 of organic people, if there are other places where we need to
22 be showing up to make sure that we're weighing in on what meets
23 the definition of compostable, how we can be sort of cleaning
24 up the, the input chain so that if we do get all of these
25 pieces lined up to comply with California state law and allow

1 California compost to be still used on organic farms. What
2 other pieces need to come together and where can other folks
3 here be making their voices heard?

4 MS. NEAR: Yeah, a lot -- yeah, there's a lot to
5 clean up. I think Ron's open invitation to U.S. Composting
6 Council is a significant one. They're really important to
7 holding those conversations, if that answers your question,
8 Allison, like who, you know, who is bringing that together.

9 I think California is really unique in that we sort
10 of have our own little micro-cause, I think I saw a comment in
11 the -- in the chat around that. But although we are just
12 California, I think a lot of communities and NRGCC is
13 representative of that, in that the case study is like I've
14 done a lot of conferences or we're leaning on a lot of also
15 integrating the food waste prevention with our state law, the
16 SB-1383, regulating short-live climate pollutants, being one.

17 So I think, you know, what you do here, this
18 landscape, and how it impacts California is going to be really
19 significant federally. And I think those, those national
20 organizations, Allison, your question, are the U.S. Composting
21 Council primarily and BPI, inasmuch as they helped pose that
22 conversation around compostable products particularly.

23 BOARD MEMBER JOHNSON: Thank you.

24 CHAIR SMITH: Thanks so much for being with us,
25 Hilary.

1 MS. NEAR: Yes.

2 CHAIR SMITH: We have Harry Rice up. And then we're
3 going to take a break. And then so, Harry, if you could state
4 your name and affiliation, and then get started.

5 MR. RICE: Great, thank you. Hi, my name is Harry
6 Rice and I am with the Global Organization for EPA and DHA
7 Omega-3s, GOED for short. We represent the worldwide industry
8 for EPA and DHA, the primary launch of Omega 3 fatty acids
9 found in fish oil. Our membership is built on a quality
10 standard unparalleled in the market and our mission is to
11 increase consumption of EPA and DHA, and to ensure that our
12 members' products -- or our members purchase quality products
13 that consumers can trust. GOED appreciates the work of the
14 NOSB handling subcommittee in reviewing fish oil as part of the
15 2026 Sunset Review.

16 As we did in 2015 and again in 2019, GOED continues
17 to support the inclusion of fish oil in 7 C.F.R. 205.606,
18 non-organically produced agricultural products allowed as
19 ingredients in or on processed products labeled as organic.
20 Because the National Organic Program does not have production
21 standards for aquaculture, fish and thus fish oil cannot be
22 commercially available as organic.

23 Since fish oil does not exist as organic, consumers
24 who prefer organic products should have access to those
25 products made with non-organically produced fish oil. During

1 previous sunset reviews, sustainability has been the most
2 contentious issue regarding the inclusion of fish oil under
3 7 C.F.R. 205.606 and we are disappointed that the National
4 Organic Program chose not to act upon NOSB's 2021
5 recommendation to modify the fish oil annotation.

6 As we communicated in both our written and oral
7 comments in both the spring and fall of 2021, GOED and its
8 member companies who supply the category, support stable
9 fishing practices, and reviewed a modification of fish oil
10 annotation as an acceptable solution to address sustainability
11 concerns, to ensure that fish oil is compatible with organic
12 practices.

13 At the same time, we have expressed previously that
14 there is no fish species in the world that is caught primarily
15 for fish oil production, a concern that's been raised in the
16 past, would contribute significantly to sustainability debate.
17 Fish oil is always a value-added byproduct of fishmeal or
18 seafood production, because the proteins value is much greater
19 than that of the oil.

20 GOED believes that protecting our oceans and natural
21 resources is paramount. Maintaining our oceans is not only
22 good environmental stewardship, but also ensures sustainable
23 growth in the Omega-3 industry as a whole. Fortunately, most
24 of the fisheries from which fish oils are sources have either
25 been certified or are currently pursuing certification by the

1 Marine Stewardship Council, who are the well respected programs
2 and organizations which exist solely to improve global
3 sustainability of the Omega-3 industry.

4 In conclusion, GOED encourages the NOSB to retain
5 fish oil on the National List. And please do not ever hesitate
6 to contact GOED with any questions related to fish oil or any
7 other EPA or DHA product. Thank you for your time and tireless
8 efforts.

9 CHAIR SMITH: Thanks so much, Harry, for your
10 comments. Does anyone have questions for Harry? Oh, I see
11 Wood. Wood, please, go ahead.

12 BOARD MEMBER TURNER: I just want to thank you for
13 your comment about the (audio distortion) action. I appreciate
14 that -- appreciate that comment. Thank you.

15 CHAIR SMITH: Okay. Thanks for joining us, today.

16 MR. RICE: Take care.

17 CHAIR SMITH: Okay, everybody, we are going to take a
18 break. Let's come back at 20 after. That's 13 minutes. Okay,
19 great.

20 (Off the record from 3:07 p.m. to 3:20 p.m.)

21 CHAIR SMITH: Okay. Sorry for not announcing the
22 people coming up. So thanks, Jared or Andea for posting that.
23 Just so everybody is aware, we're running about 20 minutes
24 behind, so not too shabby. Up next we have Rob MacGregor, then
25 Nicole Dehne, and then Heather Spalding. Rob, if you could

1 state your name and affiliation for the record, and then you
2 can get, get going.

3 MR. MacGREGOR: thank you. I'm Rob MacGregor with
4 Horizon Organic Dairy. Hello members of the Organic Standards
5 Board. I'd first like to thank you for allowing me to address
6 the Board during the semi-annual meeting. I'm a large vendor
7 and who has worked in the dairy industry for 15 years. I
8 currently work for Horizon Organic as a milk quality and animal
9 welfare manager.

10 I've seen many changes and advancements in my career
11 on how animals are cared for and the focus that is now put on
12 the welfare and well-being of the animal. I'm very excited
13 about and fully support the NOSB having the opportunity to
14 approve meloxicam for use in organic cattle.

15 Dehorning is a necessary practice in dairy facilities
16 across the country. Removal of horns protects caretakers who
17 work around the cattle on a daily basis. It also protects
18 other animals in the herd from aggressive or dominant animals
19 that would be even more dominant with a set of horns. I have
20 seen firsthand cows who have used their horns quite viciously
21 on other animals in the herd to fight for bunk space, water
22 access, and meadow line spaces.

23 Dehorning, while necessary, is also a painful
24 procedure as horn tissue is removed via, via thermal burning.
25 Rightfully so, the dairy industry is beginning to move to

1 multi-modal pain control when performing the procedure. This
2 involves using lidocaine for immediate procedural pain control
3 and a longer acting anti-inflammatory for longer term pain
4 control.

5 Currently, organic dairy producers have limited
6 options available for anti-inflammatory methods they can use.
7 Aspirin is available, but its effects have been shown to be
8 short-lived. Banamine is also available, but it is difficult
9 to give and it must be given in IV, and so many producers are
10 scared to give it. There are also natural substances that are
11 currently allowed for pain control, but these have not
12 scientifically been shown to be effective.

13 Meloxicam is an anti-inflammatory drug that is
14 commonly used in humans, horses, conventional dairy, and small
15 animal medicine. It has the benefit over the two medications
16 that I previously mentioned in that it has been shown in
17 multiple sites to be more effective to control pain than
18 aspirin in ruminants. When compared to Banamine, it is
19 routinely administered in pill form, making it much easier to
20 give to calves, who often have veins that are hard to find.

21 Adding meloxicam to the approved substances list
22 would give dairy producers a safe, reliable, and easy to
23 administer medication that will help them to meet the welfare
24 demands of the public that is becoming more and more aware of
25 where their food comes from and how it is produced.

1 My main focus today was to offer support for the use
2 of meloxicam. But I would also like to offer my support for
3 the continued uses of Xylazine on organic dairies as it
4 sunsets. This is a common sedative in dairy practice that can
5 be used in a variety of situations, including for anxious
6 animals and for practices or surgery that require sedations.
7 Additionally, I would like to offer my support for the
8 continued use of the parasiticides moxidectin and fenbendazole.
9 I agree that the regular use of these should not be a crutch to
10 offset -- practices, but I strongly feel that -- is necessary.
11 Thank you.

12 CHAIR SMITH: Thanks much, Rob. Any questions for
13 Rob? I don't see any. Thanks so much for your comments today.

14 MR. MacGREGOR: Thank you.

15 CHAIR SMITH: Okay. Next up we have Nicole Dehne,
16 then Heather Spalding, and then Ginny Olson. You can state
17 your name and affiliation, and then get started, Nicole.
18 Thanks.

19 MS. DEHNE: Great, thanks, Kyla. My name is Nicole
20 Dehne. I'm the certification director for Vermont Organic
21 Farmers and we represent close to 750 organic producers in the
22 state of Vermont. I'd like to thank the NOSB and the NOP for
23 all of your hard work. And today I am commenting on compost.

24 So VOF does not support a change in the regulations
25 to redefine compost feedstocks. We feel organic farmers in

1 Vermont would be negatively affected by this change. As we all
2 know, compost is a critical input that farmers in Vermont use
3 to improve quality and health. We are concerned that changing
4 the regulations to allow more synthetic feedstocks in approved
5 compost would risk serious contamination for organic land.

6 VOF does run our own compost approval program. We
7 ask composters to fill out an application that describes the
8 feedstocks they use, the composting process, and ask them how
9 they mitigate the risk of contamination from specific
10 feedstocks. They fill out the application and have an onsite
11 inspection every two years. Once approved, we identify them as
12 compost approved for use in organic farms. And this allows our
13 producers to understand that their compost meets the NOP
14 guidance for compost, but it also provides some assurance that
15 these composters are addressing contamination risks from
16 feedstocks.

17 So our approved composters are required to screen
18 feedstocks for plastic and compostables before the composting
19 process begins. We agree 100 percent these contaminants are
20 not removed during this step, but it is still an important step
21 to reduce the contamination of the final product. An even
22 better step is not accepting food waste that allows compostable
23 products and some of our composters start there.

24 Commercial compost operations in Vermont have
25 identified that it's feasible and preferred to avoid allowing

1 compostable products to enter compost. We hear from our
2 composters that there is no way for them to tell the difference
3 between the compostables in the plastic, and that because of
4 that all these materials have to be prescreened at the same
5 time. In fact, the majority of composters in Vermont have
6 stopped taking food waste that contain compostable products
7 because it increases the amount of petroleum-based products
8 that end up in the feedstock.

9 So we're worried that changing the regulations to
10 allow for some compostables will result in the allowance of
11 plastic. And then both of these -- both of these materials
12 will be screened out in the final compost process versus
13 prescreening, resulting in a compost with more potential
14 contaminants.

15 So in general, we feel that compost approved for use
16 on organic farms should meet more stringent standards. Because
17 composting processes can concentrate contaminants, you must be
18 extremely diligent about what feedstocks are allowed to be
19 used. And, finally, this regulation change would not help
20 organic farmers. It would put them at more risk for potential
21 soil contamination and it would not improve the quality of the
22 compost that they rely on. Okay, I had plenty of time.

23 CHAIR SMITH: Thanks, Nicole. A couple of questions
24 for you. Go ahead, Mindee.

25 BOARD MEMBER JEFFREY: Hi, Nicole. Thank you so much

1 for your comments. I really appreciate the work you guys are
2 doing up there in Vermont. And I was wondering on a couple of
3 fronts if you could tell me about the two-year inspection
4 cycle, like what the visibility that gives you in evaluating
5 compost, because we know some there are not inspection
6 requirements for every compost. So just wanted to hear a
7 little bit more about how that's helping you.

8 And then just kind of in the philosophical thinking
9 of how can we get to reduce contamination, one idea I've been
10 wondering about is if post-consumer versus post-producer of
11 food waste feedstock could be an interesting path. And I was
12 wondering if as your composters are looking at feedstocks they
13 decide not to take, if that's a distinction that you see out
14 there in that like it could be easier for us to source food
15 waste that isn't as contaminated from a brewery and their spent
16 grain more so than from a brewery serving burgers and we're
17 taking all of that. So just wondering thoughts on that.

18 MS. DEHNE: Sure, okay. So we implemented our
19 compost approval program, we pretty much stole our model from
20 MOFGA, who had a great system led by Eric Sideman a long time
21 ago. And the, the idea there was to be able to review the
22 compost well, that we needed to do a full application, and that
23 we needed to visit the site to see, you know, that we could --
24 very similar to organic certification. That we can see that
25 this is actually what they're doing on their site. We can look

1 for any management issues. We can look to see what the
2 finished compost looks like. We can see the feedstocks before
3 they go in, that sort of thing. So we do it every two years.
4 That's sort of a compromise. And we, we only charge like \$350.
5 So it's really a service to our producers, is how we see that.

6 For your second question, I think -- what I think
7 maybe you're getting at or how I am interpreting that is what
8 we're seeing our composters do is they're being choosy about
9 their feedstocks. And I do think that taking food waste from
10 consumers is probably the most difficult feedstock to take,
11 right? So I think they just are having to look for different
12 options.

13 And, you know, we've seen composters, as I heard
14 somebody else mention earlier, that did do two different, you
15 know, did different piles. One piles that were approved for
16 use for organic producers and ones that weren't. So I guess
17 we're advocating for -- it is a wicked problem. It's a
18 difficult thing. But we feel like we need to keep the compost
19 standards for -- the compost that's going on organic farms more
20 stringent. So looking at those feedstocks more carefully.

21 CHAIR SMITH: Okay, thanks. Nate, please, go ahead.

22 SECRETARY LEWIS: Thanks, Nicole. Let's see, I was
23 curious, oh, yeah, I'm just getting through my notes here. I
24 was curious about how you all apply the C to N ratio
25 requirement in your evaluation. And whether you would like to

1 see it jettisoned, as we've heard other people comment.

2 MS. DEHNE: I've heard other people comment and I
3 don't feel like I have enough expertise to comment on it. But
4 I have -- this process is making me want to bring some of our
5 com posters that are really knowledgeable to the next NOSB
6 comments session so that you can ask them the question, because
7 I don't know the answer to that. But right now, we're gearing
8 to the NOSB regs.

9 SECRETARY LEWIS: Yeah. Let Carl know we want to see
10 him.

11 MS. DEHNE: Exactly.

12 SECRETARY LEWIS: At least -- at least on the Zoom,
13 if not in Portland.

14 MS. DEHNE: Okay. I think Zoom would be -- would be
15 accessible.

16 CHAIR SMITH: I was going to say, you know, just
17 thinking of timing, too, like maybe put -- have them put some
18 things in the like open docket, just because it's like -- I
19 don't know, anyway, if we're at proposal stage or whatever,
20 like it might be helpful to like hear as the proposal is being
21 written versus when it's already drafted.

22 MS. DEHNE: Got you, yes. Okay.

23 CHAIR SMITH: Thanks, Nicole. Anybody else have
24 questions --

25 MS. DEHNE: Thank you.

1 CHAIR SMITH: -- for Nicole? I'm not seeing any.
2 Okay, thank you so much, Nicole. Next up we have Heather
3 Spalding, then Ginny Olson, and then Mike Dill.

4 MS. SPALDING: Good afternoon, chairman -- excuse me,
5 Chairwoman Smith and members of the NOSB. I'm Heather
6 Spalding, deputy director of Maine Organic Farmers and
7 Gardeners Association, MOFGA. We're a broad-based community
8 working to create a food system that's healthy and fair for
9 all. Through education, training, and advocacy we're helping
10 farmers thrive, making more local organic food available, and
11 building sustainable communities. We certify 526 organic farms
12 in processing operations, representing roughly \$120 million in
13 sales. And we have more than 15,000 members. And we're also a
14 member of the National Organic Coalition.

15 I appreciate the opportunity to emphasis a few of the
16 work items of concern to MOFGA, the nitrogen rule, synthetic
17 materials in compost, and inerts and pesticides. Briefly, we
18 urge you and NOP to push EPA to issue comments on the NOSB
19 recommendations in the organic nitrogen omnibus rule and we're
20 just worried that the longer it takes for EPA to respond, the
21 less likely action will happen.

22 Following up on Nicole's comments, we strongly oppose
23 the allowance of synthetic materials into compost used in
24 organic management. We know that PFOS is showing up in
25 compost. And it's, it's a real concern. We've tested for it.

1 Maine farms are struggling with the adverse effects of the
2 government turning a blind eye to forever chemicals in
3 biosolids that were used for fertility. And that crisis really
4 should underscore the urgency for adopting a more -- a
5 precautionary approach to materials that we're using in our
6 food and ag system, especially in the organic sector.

7 We have at least 68 farms in Maine that have serious
8 PFOS contamination and more than 600 residential wells in one
9 community have been contaminated by PFOS in sludge used for
10 fertility on neighboring farmland. We know that those numbers
11 are going to go up significantly with EPA's recent announcement
12 about maximum contamination levels in the water, stricter
13 standards.

14 This is not unique to Maine, of course. It's
15 happening everywhere. It's just Maine has been testing. And,
16 again, we've been testing for PFOS in allegedly compostable
17 dinnerware. We know it's showing up and we know it's
18 contaminating the, the compost. So we just really want to take
19 more of a precautionary approach to that. And, and again that
20 also includes plastics that could be, you know, microplastics
21 that are increasingly showing up in compost.

22 And then we also want to urge the NOSB to adopt the
23 rigorous review process for the so-called inert ingredients in
24 pesticides to ensure that the toxic materials that otherwise
25 would not be permitted on the National List are kept out of

1 products for organic management. And my time is up. But I
2 really appreciate all you do. Thank you very much.

3 CHAIR SMITH: Thanks so much, Heather. Does anyone
4 have questions for Heather? I see one from Nate. Nate,
5 please, go ahead.

6 BOARD MEMBER POWELL-PALM: Hi, Heather. Thanks for
7 your comments today. I wanted to reference back, refer back to
8 your written comments about testing. Is there a reason that
9 certifiers, especially private nonprofit certifiers can't
10 adjust their fee schedules to accommodate any sort of business
11 challenge? I understand state certifiers are going to need
12 legislative action to change fee schedules. But your comment
13 said that you have a fixed fee schedule and that would make it
14 hard for you to adequately test your operations. I was
15 wondering why you can't change that as an organization.

16 MS. SPALDING: Yeah, thank you very much for the --
17 for the question. And I didn't touch that -- I didn't touch on
18 that in my oral comments. I'm not a superfast talker. So, but
19 yeah, so this is, you know, MOFGA, you know, since the
20 beginning, we're over 50 years old now. We -- since the
21 beginning, we've really tried to make certification accessible
22 and affordable for all.

23 We work really hard to do that. We are lean and we
24 have a really tight budget. I suppose we could do that, but we
25 really feel that, you know, we want -- we are grateful for all

1 the work that has taken place to uphold the integrity of the
2 organic label, and strengthening organic enforcement is
3 incredibly important. We just want to -- I guess the message
4 that I was trying to get across there is really that we want to
5 make sure that the cost to -- not only to the accredited
6 certifying organics, but also the, the producer seeking
7 certification are not going to be unbearable.

8 And, you know, we already know that the cost share
9 program has been, you know, limited and has been reduced, and
10 then kind of rebounded. There's uncertainty in the future
11 about how that funding is going to be available to help people
12 become certified. So I guess the answer is we really would
13 rather be very clear and consistent, and strive to keep our
14 certification costs as low and affordable as possible. And
15 that's just the, the model that we've embraced, rather than,
16 you know, sort of an ala carte or just adding on additional
17 fees all the time, and passing those along to our producers.

18 BOARD MEMBER POWELL-PALM: All right, appreciate
19 that. For importers bringing in say \$50 to \$100 million, do
20 they need a \$1,500 certification? Is it ethical to have them
21 only at a \$1,500 certification?

22 MS. SPALDING: Yeah, I, I -- it's a good point,
23 right? I mean I, I agree that we're not -- that's, that's sort
24 of a different league from what we're -- what we're working
25 with. But --

1 BOARD MEMBER POWELL-PALM: Totally, yeah. And I
2 don't meant to put you on the spot or anything. I think it's a
3 really good question. How do we make sure that we're equipped
4 to play ball in the arena that we're currently dealing with to
5 make sure that for all the farmers we've heard from today,
6 we're able to level the playing field in the certification. So
7 really appreciate your thoughts on that.

8 MS. SPALDING: Yeah. I think that it's, it's
9 certainly something I, I wish that Chris Grigsby, who is our
10 certification, MOFGA's certification services director, I wish
11 he were here to answer that question much better than I can.
12 But I certainly will pull together a specific response, you
13 know, more informed response. And we have -- one of our staff
14 members will be in Milwaukee next week and we'll be sure to, to
15 convey that.

16 BOARD MEMBER POWELL-PALM: Perfect. All right, thank
17 you so much.

18 MS. SPALDING: Thank you.

19 CHAIR SMITH: Thanks, Heather. Nate Lewis, I saw you
20 had your hand up and then you took it down. Are you good?
21 Okay. Awesome. Thanks so much, Heather, for being with us.

22 MS. SPALDING: Thank you.

23 CHAIR SMITH: Next up is Ginny Olson, and then Mike
24 Dill, and then Sara Neagu-Reed. Do we have Ginny?

25 MS. ARSENAULT: Ginny is on the line with us. Her

1 phone is unmuted, but her camera is not on. Ginny, it looks
2 like you're not muted on my end. If you're talking, we can't
3 hear you.

4 MS. HOLM: You can try -- did you try star-6?

5 CHAIR SMITH: Okay. Maybe we will move onto Mike
6 Dill and, Ginny, you can try to work on getting yourself
7 unmuted and we can circle or check on you after Mike. How does
8 that sound? Great, okay. Mike, name and affiliation, and then
9 hop to it.

10 MR. DILL: All right. Good afternoon, my name is
11 Mike Dill and I'm representing the Organic Produce Wholesalers
12 Coalition, otherwise known as OPWC. Today, I'll be commenting
13 on three topics, as well as one general idea for improving the
14 NOSB experience.

15 First, this meeting was a doozie, 269 page packet, 15
16 topic areas, 56 sunset materials, and many, many questions for
17 stakeholder response, often several questions per topic. It's
18 really astonishing the amount of thought and work that the 15 -
19 - I mean 15 Board members put into this single meeting, as well
20 as the effort required by the organic community to respond.

21 The problem is such an extensive range and depth of
22 topics makes it impossible for commenters to provide sustansive
23 -- substantive feedback within the 30-day timeframe. OPWC
24 would like to offer the following ideas to foster more in-depth
25 exchange of ideas and information. One, we could move all

1 discussion topics to a townhall format throughout the year with
2 a 60-day advance notice period. Two, dedicate the spring
3 meeting to sunset materials and research priorities only.
4 Three, reserve the fall meeting for proposals and sunset
5 materials only, those topics that are up for a vote. And then,
6 four, we could make the spring meeting virtual and the fall
7 meeting in-person to reduce expenses, cut our carbon footprint,
8 and increase the equity of participation opportunities.

9 Next, OPWC supports the proposal on improving support
10 for organic transition, but we would like the subcommittee to
11 add a reference to the farm bureau in Section 3 of the
12 proposal. We think that this is an important investment in
13 relationship and trust-building with a group that we simply
14 cannot afford to overlook.

15 Additionally, OPWC would like the NOSB to work with
16 stakeholders to create a definition for the terms transition,
17 transition and/or transitional land. The industry uses the
18 term transition extensively. Yet, the closest thing we have to
19 a definition in OFA or the NOP is a reference to a three-year
20 eligible period. Neither OFA nor NOP use the term transition
21 as it relates to land. The result is that transition is a
22 concept not linked to land undergoing any ecological
23 transition.

24 On the topic of organic food system capacity and
25 constraints, OPWC would like to re-emphasize our concern about

1 the possibility of negative impacts on organic markets if
2 programs and -- if programs incurring transition are not
3 balanced with equal or greater emphasis on growth and
4 development of markets for organic products. In our comments,
5 we offer several suggestions, one of which is prioritizing
6 regulation and enforcement of eco-sustainable regenerative and
7 all other green claims made on agricultural products.

8 Finally, on the topic of compost, OPWC disagrees that
9 biodegradable plastics and other potential components of
10 compost should be included in a definition of the term compost
11 feedstocks. Instead, we favor a listing for biodegradable
12 plastics and input such as PLU stickers as compost on 205.601,
13 along with a listing for prohibited feedstocks as well.
14 Regulating compost feedstocks via the National List will allow
15 for greater flexibility, the use of annotations to refine
16 listings, and quicker action whenever AST and standards are
17 amended in the future. Thank you.

18 CHAIR SMITH: Thanks, Mike. Questions for Mike? Go
19 ahead, Amy.

20 VICE CHAIR BRUCH: Yeah, Mike, thanks for joining us
21 today. I just wanted to say thank you. I know the time is
22 short. But I appreciate the comments that OPWC did put
23 together. They're really informative. And then not a
24 question, but another just thank you for bringing up the idea
25 we need to reach out to other groups.

1 The farm bureau comment that you guys wrote about and
2 that you just spoke about I think is really important as we
3 look to grow our industry. We've got reach across the aisle
4 and work with a bunch of different groups, the ones that we
5 haven't worked with before as well. That was really powerful.
6 And I, I am thinking how we can go about doing that in the
7 future. So thanks for bringing that up.

8 MR. DILL: You're welcome. I feel the farm bureau
9 has a lot of influence. And then there's a lot of
10 inconsistency in how those state farm bureaus or even regional
11 farm bureaus work. Some are more friendly to organic and some
12 are we'll just say not so friendly.

13 VICE CHAIR BRUCH: Mm-hmm. Do you have any thoughts
14 on other groups? Farm bureau was a good one. Any other groups
15 come to mind?

16 MR. DILL: I mean there's, there's a lot of them out
17 there. You know in terms of groups that are consistent across
18 states, I think the farm bureau is, is definitely the one to
19 focus on. Again, I just -- yeah, I feel they're, they're the
20 ones with the most influence. Land grant universities, but
21 again that's kind of hit or miss, too. So, yeah. Let's start
22 with the farm bureau. If anything, bring them to where
23 they're, you know, accepting of organic and not advocating
24 against organic. And that's just like if we can get there,
25 I'll be happy. And then we can work on having them actually

1 advocate for organic consistently.

2 VICE CHAIR BRUCH: Thank you.

3 CHAIR SMITH: Nate, please, go ahead.

4 BOARD MEMBER POWELL-PALM: Mike, I appreciate your
5 comments about it being a lot, a lot of material to work
6 through. But I think you always just sort of, you know, do
7 yourself justice by bringing such good comments. And so we're
8 like if you can manage it, it's fine. So you need to lower
9 your game a little bit, because those are great. Really, I
10 just want to say I really appreciate you bringing some events.
11 Instead of just complaining about how the process isn't working
12 or how you don't like it, you're telling us what we could try
13 out. So thank you so much.

14 For the last four, six, eight meetings even we've
15 talked about how do we grow this market. And I just wanted to
16 give a huge shoutout to your Organic is the Answer work,
17 because that is the sort of stuff I was hoping the community
18 would do. And you guys are doing it. So really appreciate all
19 the extra work that's gone into spreading the word about
20 organic.

21 MR. DILL: All right. Well, thank you, Nate. And I
22 just wanted to -- I mean to your point, in the last couple of
23 meetings we have not been able to comment on all the topics we
24 would have liked to have. We did not have a substantive
25 comment on any of the crop insurance stuff, residue testing.

1 So, you know, we would like to be able to do a little bit more
2 homework, a little more research and provide better comments on
3 all those topics. But I think that's where we see that the
4 groups that are commenting on multiple comments -- or topics
5 across different scopes, that's where we see that struggle. So
6 if I were just a composer, I could, you know, 60-day or
7 30-days is great for compost. But when we're trying to hit
8 everything, it's just it's -- we just can't do the quality work
9 that we could if we had more time. So I just hope that, you
10 know, as we think about what the NOSB could become, that we
11 look at some of these alternatives and see what the NOP did
12 with like their townhall session prior to SOE or prior to the
13 market development grant. Those were really effective in
14 getting quick feedback. And then something like compost, I
15 think, where we need some quick response and a direction to go,
16 that's a good format to, to look at so we don't have to wait
17 six months and then, you know, keep waiting in six-month
18 increments. So, anyways, thanks.

19 BOARD MEMBER POWELL-PALM: Thank you again, yes.

20 CHAIR SMITH: Nate, you took the words right out of
21 my mouth. I was also going to say thanks for coming with out
22 of the box thinking and solutions. It's certainly something
23 that we will sure talk more about amongst ourselves and with
24 the program to see if any of those are actionable. So
25 appreciate it. Go ahead, Jerry.

1 BOARD MEMBER D'AMORE: I just want to say thank you
2 for quietly acknowledging that we're operating a full person
3 short now as a board. Thanks for that.

4 MR. DILL: Yeah. So and I, I apologize. At every
5 meeting I wish that I would save a little bit of room to give
6 some acknowledgement to how great the Board is. But every word
7 counts when we're looking to keep it at 500 words or less with
8 3 minutes. And so I apologize, but you all are doing fantastic
9 work and we really appreciate everything you do.

10 CHAIR SMITH: Okay. Wait, don't go anywhere yet.
11 Wood, go ahead.

12 BOARD MEMBER TURNER: Yeah, I just want to say, Mike,
13 I think you really did summarize though I think just to -- just
14 to put a point on that. You know you were talking about trying
15 to be an expert on all the different issues, like if you were -
16 - if you were one -- if you were focused on one area, one area
17 of the value chain, you could -- you could really deliver
18 highly substantive comments. And I think that, to me, when I
19 heard you say that, that actually to me is the challenge that
20 we face as a 14-person body, trying to figure out how to be
21 experts on all these issues across the value chain. It's very,
22 very, very difficult. So thank you for saying that.

23 MR. DILL: No, absolutely. And it's, again, it's
24 amazing what you -- what you're doing. And for us, one area is
25 produce. So we try to do logistics, soil, crop production, I

1 mean every aspect of, of produce. And so, yeah, I totally get
2 it. It's overwhelming. I don't know how you all stay on top
3 of it. But kudos to you all, especially --

4 CHAIR SMITH: It's really awesome and you should --
5 there's going to be a call for nominations coming up very soon,
6 and it's very rewarding and a really awesome experience, so
7 come join our group. Don't let Mike and Wood scare you off.

8 MR. DILL: No comment. We'll see you in Milwaukee.

9 BOARD MEMBER TURNER: I'm speaking through -- I'm
10 speaking through the -- I'm not trying to scare anybody.

11 BOARD MEMBER JEFFREY: But, yeah, you need to have a
12 lot of fun with your NOSB friends, so here, here, Madam Chair.

13 MR. DILL: All right, thank you.

14 CHAIR SMITH: Thanks, Mike. Okay. Ginny, do we have
15 your sound working?

16 MS. OLSON: Okay. Can you hear me now?

17 CHAIR SMITH: Yes. Okay, great. So one second. So
18 we'll have Ginny, and then we'll have Sara Neagu-Reed, and then
19 Alice Runde. Go ahead and state your name and affiliation, and
20 then you can get started.

21 MS. OLSON: Okay. Hi, I'm Ginny Olson. I'm a crop
22 insurance agent with Lockton Companies. And I actually have a
23 positive and then I have a question. So the positive is on
24 differing practices. I, I recently had a farmer who has been
25 planting spring rye with his soybeans. And I submitted the

1 request to RME to get approval for it, because he does not roll
2 or crimp his rye.

3 So I was asking for approval to insure his soybeans
4 with the spring planted rye and he would let the rye go
5 dormant. And actually RME came back and said they consider
6 that a good growing practice, so I didn't have to submit the
7 request. And my farmer can go ahead and insure it without any
8 issue. So that's a huge win. It was a really good positive.
9 So, yeah, I'm just happy on that.

10 And so the other -- the other point that I have or
11 it's actually a question is, you know, Bryce had mentioned
12 earlier like, you know, there are farmers that are leaving
13 organic. From the crop insurance world, one of the reasons I
14 think, personally, is that it's, it's really hard to get that
15 yield built up. And so, for example, if I have a farmer that
16 is transitioning to organic completely new to organics, the
17 first four years I have to give them -- or actually the first
18 three, if he gets 100 percent of the county T as he built up
19 his history for transition then, of course, his average yield
20 increases.

21 So, for example, with the transition, it's 140 bushel
22 farm. He'll, he'll start building up his, his yield history on
23 his transition, and then the fourth year he becomes organic in
24 the crop insurance world. When he becomes organic then I have
25 to get -- I have to go back to the start and give him 100

1 percent county T. So, for example, 140 county T on transition
2 and then he starts over on organic, then he gets 140.

3 What my question is, is, you know, do you think RME
4 would consider or are they considering possibly letting us use
5 those transitional yields for his organic. Because many times,
6 you know, by the time he has his transitional yield built up,
7 let's say that 140 T is now 170 bushel average, could I use
8 that 170 bushel when he becomes organic. And I'm just curious
9 to see if, if you're heard that request or if you know that's
10 in the works possibly.

11 CHAIR SMITH: Okay. Thanks for your comment, Ginny.
12 It looks like maybe Amy and Nate had some comments back and
13 some questions for you. And so, Amy, please go ahead.

14 VICE CHAIR BRUCH: Yeah. Thanks, Kyla. Ginny,
15 thanks for joining us today and then providing your oral
16 comments. It's always nice to hear about the progress we're
17 making with your first comment on the producer with good
18 farming practices. That's really a great story of success.
19 We've got, you know, we've got to celebrate the successes and
20 we've still got to work on things.

21 And your part two, you kind of posed a question to
22 the Board on that one. I'm going to pose it back to you as an
23 agent. It seems like you've participated in the process
24 before. You've worked with a lot of organic and transition
25 producers. Would that be beneficial what you -- what your

1 question was if from an agent perspective, if producers are
2 able to use their transitional yield information to help
3 quickly or more quickly build their organic APH?

4 MS. OLSON: I, personally, think so just because I
5 see that that yield is -- it keeps increasing over time. And
6 so I, I think it's -- I, personally, think so. I think you can
7 definitely see the, the mind shift change when they realize,
8 oh, now I have to -- you know, I'm building -- I'm building up
9 my yield and now I have to go back to the beginning when I get
10 to organic.

11 So, yeah, I, personally, think so. I think it would
12 be a great option maybe to give that, you know, let the farmer
13 choose maybe. Because back in the day -- back in the day, you
14 know, when farmers were conventional and then they were
15 transitioning, we could use their conventional yield. Now I'm
16 not saying we go back to using conventional yields. But I'm
17 just saying if they're, if they're in that transition stage
18 would that be a potential just to give the farmer an option.

19 AUTOMATED VOICE: Recording stopped.

20 VICE CHAIR BRUCH: Thank you. That's really helpful,
21 Ginny. Appreciate it.

22 CHAIR SMITH: I don't know if that was intentional or
23 if someone pressed the recording pause button?

24 AUTOMATED VOICE: Recording in progress.

25 CHAIR SMITH: Thanks. Go ahead, Nate.

1 BOARD MEMBER POWELL-PALM: Thanks, Ginny, so much for
2 your comment. I really appreciate you both bringing the good
3 news and I want to just, you know, again give my colleague Amy
4 Bruch a shoutout for making crop insurance a focus of the Board
5 over the last few years. We are seeing tangible changes and
6 it's really incredible.

7 But I also want to thank you for that question,
8 because that very question is the sort of data gathering that
9 then, you know, when we come up with recommendations or ideas,
10 we can put forth the idea of using that transitional history
11 and probably into the organic yield history. So thanks for
12 thinking about these things and bringing ideas, rather than
13 just, you know, just complaints or just questions. So really
14 appreciate the solution oriented-nature of your comments.

15 MS. OLSON: Thank you.

16 CHAIR SMITH: Okay. Thanks for being with us today,
17 Ginny. Thanks for your comments. Glad we got your sound
18 working.

19 MS. OLSON: Thank you.

20 CHAIR SMITH: Okay. Up next we have Sara Neagu-Reed,
21 followed by Alice Runde, and then Milo Petruziello. Okay.
22 Sara, state your name and affiliation, and then you can get
23 started. Thanks.

24 MS. NEAGU-REED: Sounds good. Good afternoon. My
25 name is Sara Neagu-Reed and I serve as the director of

1 production, environmental policy, at the International Fresh
2 Produce Association. As my colleague, Emily Moyer, shared
3 earlier, our trade association represents over 2,500 companies
4 from every global fresh produce supply chain segment, including
5 over 500 companies directly involved in the organic fresh
6 fruit, vegetables, and floral supply chain.

7 For the interest of time, I will focus my comments
8 today on the residue testing for a global supply chain and
9 climate induced farming risk in crop insurance discussion
10 documents.

11 First, in regard to the residue testing for a global
12 supply chain discussion document, IFPA believes it is critical
13 to take appropriate steps to ensure that organic operations are
14 compliant with regulations, deter fraud, and provide
15 contaminated products from entering the organic supply chain.
16 However, creating more rigorous testing requirements must be
17 done cheerfully to ensure standards can be met and are not a
18 barrier to organic production.

19 Currently, residue testing is already conducted on
20 organic farms through third party certifiers. Additionally,
21 organic certifiers are required to sample five percent of their
22 clients. As NOSB considers this recommendation, it is
23 essential that any enforcement updates to residue testing
24 remains science-based and consistent with international
25 standards. Moreover, IFPA members have expressed concern if

1 testing gets more refined that producers will have difficulty
2 detecting residue at increasingly low levels, which would
3 negatively impact organic designations.

4 In regard to the climate-induced farming risk and
5 crop insurance discussion document, despite clear climate
6 benefits there remains an existing gap in insurance available
7 with these organic products. For example, one member explained
8 that they recently suffered from a virus outbreak with organic
9 tomatoes across Arizona farms. Unfortunately, crop insurance
10 is not available to those growers in the state and as a result
11 have been struggling with solutions to cover their losses.

12 IFPA supports quality factor consideration during
13 loss adjustment, assuring agents have expertise in organic
14 markets for revenue protection and ensuring adequate length of
15 timing for infield adjuster review. Additionally, I want to
16 reiterate IFPA's support for the continued use of objective,
17 science-based decision-making as NOSB considers proposed
18 changes to the National List. Each of the materials being
19 reviewed is of utmost importance to organic producers, which
20 our weigh-in comments elaborate on.

21 We are encouraged as always by analysts thoughtful
22 discussions of critical issues impacting the organic fresh
23 produce industry. Thank you for your time today.

24 CHAIR SMITH: Thanks so much, Sara. It looks like
25 you have a question from Wood. Wood, please, go ahead.

1 BOARD MEMBER TURNER: Sara, I just want to make sure
2 I understand what you just said. I thought I heard you say
3 more refined testing would limit residue detection at low
4 levels. Is that -- did you say that? And could you -- could
5 you help me understand what that means? I didn't follow that
6 comment, if that's what you said. You said -- I wrote down
7 more refined testing would limit residue detection in low
8 levels. Is that wrong or did I --

9 MS. NEAGU-REED: Oh, can you hear me? I was trying
10 to unmute myself when you were speaking and I was unable to do
11 so. Can you hear me now?

12 CHAIR SMITH: Yeah, you're good.

13 MS. NEAGU-REED: Okay. Can you -- I'm sorry, can you
14 repeat the question?

15 BOARD MEMBER TURNER: I wrote down that you said more
16 refined testing would limit residue detection at low levels. I
17 just want to make sure I heard that correctly. And if I did,
18 what is -- can you say more about that?

19 MS. NEAGU-REED: Yes, absolutely. It was just a
20 concern that if there was more rigorous testing that our
21 growers would have more difficulty in, in detecting the
22 residue.

23 BOARD MEMBER TURNER: Okay. I'm not sure I
24 understand that, but feel free to say more if you want. I'm
25 just trying to -- that doesn't make sense to me, but --

1 CHAIR SMITH: Amy, please, go ahead.

2 VICE CHAIR BRUCH: Sure. Sara, thanks for joining us
3 today and providing oral comments that compliment your written
4 comments. It's helpful to have for the crop insurance
5 discussion produce viewpoints and examples. And I'm happy that
6 you brought a few of those forward in your written comments.

7 But I had a question on your residue testing
8 comments, as well. You mentioned that we need to try to
9 maintain consistency with international standards. I believe
10 that's what, what you had mentioned. Can you elaborate a
11 little bit more on that, especially since the data that we're
12 receiving is Europe has pretty strict standards and actually
13 more standards for residue testing potentially than what the
14 U.S. has.

15 MS. NEAGU-REED: Yeah, absolutely. And that is
16 something that our growers have indicated is, is concerning to
17 them when it comes to trying to review what the EU standards
18 are versus the U.S., especially with more that they are
19 pursuing and for the perspective they're receiving. To get
20 some more detailed responses on exactly what those concerns
21 are, I would have to go back to our group and, and share those
22 back with you all.

23 VICE CHAIR BRUCH: Sure, that would be great, if you
24 don't mind.

25 MS. NEAGU-REED: Absolutely.

1 CHAIR SMITH: Sara, if you are able to get that
2 information, then you can pass it to Michelle Arsenault.

3 MS. NEAGU-REED: Yes.

4 CHAIR SMITH: And she can forward it to the rest of
5 the Board. Nate has a question. And then I see Franklin's
6 hand up, as well. So, Nate, please, go ahead.

7 BOARD MEMBER POWELL-PALM: I just wanted to follow-up
8 a little bit with what you were saying with the question of
9 Wood. If I heard -- if I'm hearing you right, it's more so
10 that the more we test, the more we'll buy. Not the more we
11 test, the less we'll buy. Correct?

12 MS. NEAGU-REED: That's correct. I'm sorry if I
13 wasn't clear on that.

14 BOARD MEMBER POWELL-PALM: Okay, thank you.

15 CHAIR SMITH: Okay. Good clarification there. Wood,
16 did that help you?

17 BOARD MEMBER TURNER: Immensely, thank you.

18 CHAIR SMITH: Great. Franklin, please, go ahead.

19 BOARD MEMBER QUARCOO: Well, I was going to follow-up
20 on that question, but this clarifies it for me, too.

21 CHAIR SMITH: Wonderful.

22 MS. NEAGU-REED: My apologies for the distraction of
23 the unmuting and not being clear on that.

24 CHAIR SMITH: No worries. Yeah, we should maybe warn
25 commenters, too, like on the in-between times, like between,

1 anyway, that you have to like sort of stay unmuted or else you
2 get locked out of the mute. Anyway, thanks so much, Sara, for
3 being with us today and thanks for your comments. Okay. Next
4 up we have Alice Runde, then Milo Petruziello, and then Justin
5 Raikes. Alice, you have some slides which are coming up,
6 perfect. Please state your name and affiliation, and then you
7 can get started.

8 MS. RUNDE: Thanks, Kyla. Good afternoon. My name
9 is Alice Runde. I'm the operations director at the National
10 Organic Coalition or NOC. Next slide, please.

11 NOC is extremely grateful for the tremendous work
12 that the NOSB leads and we think it's crucial for the NOSB as
13 public representatives of the organic community to actively
14 seek to center racial equity in the organic movement. Racial
15 equity needs to be centered in organic for the following
16 reasons:

17 One, diversity is an essential tenet of organic.
18 Also, system increases has disenfranchised farmers of color.
19 We need to acknowledge indigenous knowledge and the narratives
20 elevated when talking about organic practices. And, finally,
21 collective liberation, understanding that addressing challenges
22 that farmers of color face at disproportionate rates would help
23 all farmers. Next slide, please.

24 The USDA equity commission as was referenced in
25 previous comments analyze how USDA's programs and policies

1 contribute to suspending discrimination. In February, the
2 commission published their final report which provided 66
3 recommendations. In our written comments, we highlight a few
4 examples of recommendations that seem particularly relevant to
5 the NOSB and NOP. Next slide, please.

6 Here, I'd like to elevate the first recommendation in
7 the reports, institutionalized equity. As Lily Hawkins of OFA
8 said, the report says lasting and long-term organizational
9 change requires consistent leadership attention, adequate
10 resources, and accountability. Especially because NOSB members
11 only, only certify the appointment, it is important that any
12 equity practices, resources, and accountability mechanisms be
13 institutionalized in the NOSB processes and supported by the
14 NOP. We encourage the NOSB to work on this idea and to ask for
15 recommendations from the public and organizations experienced
16 in this area. Next slide, please.

17 On this slide and in our written comments, NOC
18 suggests several ways to institutionalize equity in NOSB
19 processes. For example, by, by including racial equity
20 training in the onboarding process for new NOSB members and by
21 including work agenda items that directly address racial equity
22 in organic. Next slide.

23 An example of institutionalizing equity would be to
24 build a culture of equity inclusion at the NOSB level and
25 adjust barriers to participation for diverse representation on

1 the NOSB. One way to a culture of equity inclusion at the NOSB
2 level would be to set agreements about how to work together.
3 Everyone appointed at the Board was selected because of their
4 outstanding skillsets, but it takes a group acknowledgement to
5 make sure that all Board members have equal chances to voice
6 their opinions.

7 Community agreements can help make power dynamics
8 more visible and ensure everyone in the room gets to contribute
9 to the process. One way to address various -- for diverse
10 representation on the NOSB is to leverage a technical
11 specialist role. Their focus is to ease the burden of Board
12 service. We would like further clarification on the process
13 that Board members use to request support and if there are
14 limits to the support offered. We believe that the NOP should
15 not be a gatekeeper for support or output of that staff, and in
16 our written comments we provide suggestions for a transparent
17 process. With many upcoming Board positions needing to be
18 filled, we encourage this transparency so that we talk -- when
19 we talk and encourage qualified people to apply, we can
20 accurately tell them what support they might be able to expect.

21 Thank you so much for your work and your commitment
22 to organic agriculture.

23 CHAIR SMITH: Thanks so much, Alice. Any -- I can't
24 see. It looks like there's two hands raised and that would be
25 Allison and then Wood. Allison, please, go ahead.

1 BOARD MEMBER JOHNSON: Thanks so much for your
2 comments, Alice. I'm sure NOC and OFA's and other's attention
3 to the racial equity in organic, I'm really glad to see it
4 continuing to come up as a thread and we're spending a lot of
5 time thinking about what we can put into action as a Board. We
6 lost your last slide there, but I would love to see a little
7 bit more. You're suggesting barrier and participation in
8 organic, if we could take another look. If you have thoughts
9 about what else the Board can do where we're looking at ways to
10 explore the Equity Commission's report and recommendations in
11 the fall, and really welcome other thoughts about how we can
12 address some of these barriers from where the Board sits.

13 MS. RUNDE: Yeah, thank you so much for the question.
14 So this slide was also referenced by Amy. Thank you so much
15 for pointing it out. It's in our written comments. This is a
16 resource that was developed thanks in large part to a human
17 capital initiative with OFA, NOC, IOIA, FM North America, ACA,
18 and it really highlights some of the barriers to organic
19 certification. And we've done a few exercises with hundreds of
20 people trying to identify which points of these barriers could
21 be tackled by which types of organizations. And I think we all
22 plug in on specific areas.

23 I think it would be interesting for the NOSB,
24 themselves, to determine which areas might be most relevant to
25 the NOSB's work depending on the work agenda items and your

1 priorities. And then I'm happy to work with NOC members as
2 well to determine where we think the NOSB might have most
3 leverage in addressing these barriers.

4 BOARD MEMBER JOHNSON: Great. Thanks so much.

5 MS. RUNDE: Thanks so much for the question, Allison.

6 CHAIR SMITH: Wood, please, go ahead.

7 BOARD MEMBER TURNER: Alice, great comments. I
8 really appreciate your comments and this is very important.
9 What I really love about them, kind of to Mike's comments
10 earlier, is how, how solution-oriented they are and how
11 action-oriented they are. So thank you for that.

12 I, I just want to point out that this is a question
13 specifically about research priorities. And I know we heard
14 several comments in the written comments about including
15 content or including research priorities around racial equity.
16 And I, I don't -- what I didn't see in those comments were what
17 those -- what those research priorities might be, what those
18 research topics might be. I think where your -- where you're
19 focusing your comments around actions is great. I just don't
20 quite understand the research piece of it.

21 And so I, I'd love to hear more about that if you all
22 those any concrete thoughts on that at this stage or I can just
23 -- I'm just floating the comment out to the community to say,
24 hey, if you want to -- if you want to see these in the research
25 priority, let's talk specifically about what you want to know

1 about.

2 MS. RUNDE: Yeah, that's a really great question.
3 And I, I'm also very action-oriented, so I really appreciate
4 that comment. I think one thing we've elevated in previous
5 versions of our comments are research on barriers to organic
6 certification. And I think we have more and more research
7 around that and we've been able to synthesize it. And I think
8 now the research that's needed is how to address those
9 barriers. And I'm sorry I wasn't that clear in our comments,
10 but I'm happy to circle back with more tangible suggestions.

11 BOARD MEMBER TURNER: That's great. I just -- I'm
12 just trying to -- I'm just trying to actually just figure out
13 what the -- if there is a research question. And so that's --
14 that helps me. That helps me, thanks.

15 MS. RUNDE: Thank you.

16 CHAIR SMITH: Thanks, Alice. I was just going to say
17 surprisingly five years goes darn quick, like shocking. Like
18 we start here like, oh, my gosh, five years is forever, and
19 then it's like a blink of an eye really. I believe there will
20 be a report out on -- during PDS on the wonderful work that our
21 food technologist support persons have been providing to the
22 Board. So you can look forward to that and hopefully that will
23 help in your engagement with potential candidates. Amy, you
24 have a question. Please, go ahead.

25 VICE CHAIR BRUCH: Thank you, Kyla. Thank you,

1 Alice, for your comments, really appreciate them and the
2 written ones, as well. Just kind of a thought question. We've
3 heard from a lot of producers that are organically certified
4 right now with some of the challenges that they're
5 experiencing. For the community, how should we balance our
6 time for recruitment of new organic producers and the retention
7 of the current ones in our -- in our existing community. What
8 should be the balance, the ratio of that?

9 MS. RUNDE: I'm laughing because I feel like it's
10 such huge question that I'm not quite in a position to answer.
11 But I will put in a plug for our meeting in Milwaukee, we'll
12 have a panel of farmers, local farmers, six local farmers, a
13 couple of which have been certified and have chosen not to
14 certify anymore. So I think hearing from them directly about
15 why those chose not to certify anymore and are still using a
16 lot of organic practices would be really helpful in sharing
17 that messages -- that message as well with us as organic
18 advocates. I'm sorry, I don't have a good answer.

19 VICE CHAIR BRUCH: No problem. Thank you. And
20 thanks for letting us know about that panel, appreciate it.

21 CHAIR SMITH: Thanks, Alice. Thanks for spending
22 some time with us today and for your comments.

23 MS. RUNDE: Yeah, thank you so much.

24 CHAIR SMITH: Yep. Okay, up next we have Milo
25 Petruziello. Justin Raikes is after Milo. And then Jackie

1 DeMinter. Milo, please, state your name and affiliation, and
2 then you can get started.

3 MR. PETRUZIELLO: Hi, good afternoon. I'm Milo
4 Petruziello, policy director at Ohio Ecological Food and Farm
5 Association. Our organic certification program certifies about
6 1,100 organic farmers and food processors in 12 states. And
7 our policy work represents a broad coalition of farmers,
8 gardeners, and food advocates across Ohio and our certification
9 region. I appreciate the opportunity to comment on behalf of
10 our organization, the farmers who certify, and our
11 non-certified members, particularly those who are non-farm --
12 who do not farm and rely on the integrity of the organic label
13 in making food choices.

14 So I'm going to comment related to the possibility of
15 allowing compostable packaging that meets certain ASTM
16 standards and to organic compost. We are quite alarmed by this
17 possibility. We think this creates an unacceptable avenue for
18 these products, many of which contain PFOS, as Heather pointed
19 out earlier. And would put them in position to be allowed on
20 organic farms with no scrutiny of their composition. This
21 would represent an official approval for applying PFOS to
22 organic farms is our concern.

23 You know, we don't see how organic farmers would
24 benefit. There is no evidence that allowing these materials in
25 organic compost would improve its quality, posture or

1 availability. We are concerned it would negative affect
2 quality, in fact, as composting -- we're concerned that
3 composting is not sufficient to convert these products not
4 non-toxic substances that can be utilized by plants and soil
5 organisms.

6 And we fear that the risk to public faith in organics
7 is massive. Awareness of the pervasiveness of PFSO and its
8 health risks is increasing. I mean you can see it in a simple
9 Google search. PFOS has been linked to liver and kidney
10 disease, alter thyroid function, led to insulin degradation,
11 adverse reproductive and developmental outcomes, and cancer.
12 These chemicals cycle through the soil, have appeared in crops,
13 dairy, and meat products.

14 We know that PFOS contamination is already affecting
15 farms as instances in Michigan and Maine unfortunately
16 demonstrated. And allowing compostable products treated with
17 PFOS into organic production would only make this problem
18 worse. So I, I really urge the NOSB to consider the impact
19 approving these products would have on public trust. You can
20 imagine a world where the average consumer buying organic to
21 avoid chemical exposure learns that PFOS is expressly allowed
22 in organic compost. And what would we say to that person.

23 So I just want to thank all of you for your service
24 to the organic community and for taking my comments.

25 CHAIR SMITH: Thanks so much, Milo. Questions for

1 Milo? I see Nate has his hand up. Nate, please, go ahead.

2 SECRETARY LEWIS: Hi, Milo. I had a question about
3 OFA's comments on methionine. And I, I was intrigued, because
4 you offer the possibility of aligning with or you suggest the
5 possibility of aligning with Canada and the EU where we would
6 make natural sources the first option, and then methionine
7 would be a second option of the natural sources are not
8 available.

9 And my clarification question is whether or not you
10 would support such a thing with the quantity restrictions that
11 we currently have of two pounds per ton or would it be not
12 restrictions except for that natural preference in the -- in
13 the annotation? And Milo probably can't unmute himself. There
14 you go.

15 MR. PETRUZIELLO: Thank you. Thank you for that
16 question, Nate. Honestly, I would really refer that comment to
17 one of my colleagues, either Sal Bigham (phonetic) or Matt
18 Bagley (phonetic), whom I believe are both on the schedule to
19 comment. That really their, their expertise and they can speak
20 to that part.

21 SECRETARY LEWIS: Great. I will repeat the question
22 then and maybe make it a little more tight. That wasn't a very
23 tight question. So thanks.

24 CHAIR SMITH: Okay. I don't see any other questions
25 for you, Milo. Thanks so much for your comments today and

1 spending some time with us.

2 MR. PETRUZIELLO: Thank you.

3 CHAIR SMITH: Okay. Up next we have Justin Raikes,
4 then Jackie DeMinter, and then Mark Way.

5 MR. RAIKES: Hello?

6 CHAIR SMITH: Yep, I can hear you. Yep, name and
7 affiliation, and then you can get started.

8 MR. RAIKES: Yeah, absolutely. I'm Justin Raikes.
9 I'm a fifth generation row crop farmer in Nebraska who is able
10 to return to the farm because of the NOP. You know, unlike so
11 many other types of farming discussed years ago, the promise of
12 organic production is included a steady market where prices
13 didn't crash or skyrocket. You know, in the last two years
14 we've gone from a \$50 a bushel of organic soybeans down to \$17
15 a bushel soybeans. And it's tough to keep going with prices
16 like that.

17 As you know, large price movements in one organic
18 commodity will impact all others that could be grown on the
19 same acre. So that volatility has trickled down into every
20 other crop we could potentially grow. And for us that's
21 currently corn, wheat, alfalfa, peas, buckwheat, soybeans, and
22 rye. And we've seen movements in all of those markets.

23 So on our farm, we, we strive to pay living wages to
24 all of our, you know, all of our employees. We support a lot
25 of families. We've been able to do that and provide stability

1 for those folks and those families because of the steady price
2 environment, similar to when we, we first got started. You
3 know, this price volatility really has a lot to do with this
4 flood of imports that's coming in. And there's ample evidence
5 that these imports are coming from countries that a) don't have
6 their own secure domestic food supplies and b) let alone a
7 regulatory framework that is comparable to NOP and, you know,
8 reflects the work that you all put into this.

9 The other thing I want to say is imports also appear
10 to fail a mass balance -- a basic mass balance test like the
11 ones we are required to do as part of our certification every
12 year. We're grateful the NOSB is working to ensure integrity
13 is being maintained and the playing field level discussion
14 document on testing at CACS. Read that document and the SOE
15 rule. But we also need more. And we appreciate the SOE rule.

16 We fully support increased testing. This five
17 percent rule is just not enough. Practically speaking, all of
18 our production gets tested. Why do we have different standards
19 is the practical question. We need everyone to be talking
20 about how we can place value on domestic organic commodities
21 market and the benefit it brings to farmers keeps America's
22 organic farmers growing. This has to work for us as a business
23 and everybody else. Cheap foreign supply will not.

24 Furthermore, many efforts to encourage new
25 transitional acres will not succeed if the organic standards

1 are not uniformly enforced. Finally, I just wanted to thank
2 RMA for continuing to make steady progress. Appreciate all the
3 incremental changes there. And we would also support the
4 carryover transition yield to an organic search. Thank you.

5 CHAIR SMITH: Thanks, Justin. Nate, please, go
6 ahead.

7 BOARD MEMBER POWELL-PALM: Yeah. Thank you, Justin,
8 for taking the time to be with us today. Just to be clear,
9 you're -- I know you are, you're a fan of using testing as an
10 enhanced tool to make sure the playing field is level. Is that
11 correct?

12 MR. RAIKES: Absolutely.

13 BOARD MEMBER POWELL-PALM: Okay, really appreciate
14 it. Thank you.

15 CHAIR SMITH: Kim, please, go ahead.

16 BOARD MEMBER HUSEMAN: Thank you, Justin, for your
17 comments. I have two questions. The first one is around price
18 volatility. And help me understand outside of a global supply
19 chain, what other tools would be effective to help mitigate the
20 volatile environment of organic farming?

21 MR. RAIKES: Well, I think, you know, there have been
22 a lot of ideas discussed in these -- in these meetings. You
23 know, I think every effort that can be made to ensure integrity
24 helps so that we're dealing with the same, you know, the, the
25 legitimate pool of acres, let's say, to start with.

1 The volatility, to me, is new because of, you know,
2 to me it looks like there's a lot of linkage with conventional
3 or conventional pricing, which ought not really be there. And
4 so I think, you know, part of my argument here is that's,
5 that's volatility that shouldn't exist or should take -- or
6 should have a lot different shape than it's -- than it's been
7 taking. And our observation is that that's increased
8 dramatically over the time that we've been -- we've been in the
9 program.

10 So, you know, in terms of additional, additional
11 steps, you know, outside of the enforcement of the rules, you
12 know, I think the efforts underway on the crop insurance front
13 are all positive to keep the, you know, producers supported in
14 the event of failures and so forth. And, you know, that's,
15 that's been proven to be a key part of the price volatility
16 solution on the conventional side as well. You know, I --
17 those are the big ones to me is let's make sure we're enforcing
18 the rules evenly and, you know, encouraging. And if we are
19 doing that, transitioning new acres in is easier, frankly. And
20 so I mean that's the long-term solution. And that's, that's
21 what I -- I get a little frustrated when I hear certain
22 end-users talking about the need for imports because the
23 domestic production doesn't exist or the volatility of domestic
24 production. If we had more acres there, you know, we would
25 have a bigger base to work off of, which inherently is going to

1 reduce some of the production. We're not going to have more
2 acres if we're, we're undercutting domestic price.

3 BOARD MEMBER HUSEMAN: Okay. So as we talk about
4 price discovery and volatility, we've go the supply side that
5 we've discussed. But then there is the demand side, right?
6 That's the other -- the other half to this price discovery.
7 And any thoughts on how we can promote some of the, the
8 demands? I'm seeing that there is some concern there with the
9 elevated growth patterns that we saw in some organic streams
10 that would be tributary to your supply -- to your supply.
11 Those, those have been challenged as well. So I think that's
12 on the demand side.

13 MR. RAIKES: Well, look, I, I think that if I'm
14 following the thrust of your question here, I think, you know,
15 we have livestock as well, so we sit on conventional, so we --
16 I see this on both sides. And you can't have, you know, sky
17 high prices and have the livestock portion of this thing work
18 to the extent we're in the feed grain. That's a little bit
19 different issue on the food grade side.

20 But, you know, that's kind of the point, though, is
21 if we've got -- the source of extreme volatility here I think
22 is as, you know, as we've kind of cracked down on some stuff
23 that maybe wasn't, you know, so legit, you know, you create
24 this temporary period where everyone, you know, there's big
25 exposure on the buy side and, and, you know, that's going to be

1 bad for the dairy guys and bad for the, you know, the demand
2 side of the equation.

3 What we want I think is the same thing as what they
4 want, which is we want a steady, you know, we don't need the
5 sky high. We need steady. And that's, that's kind of what
6 we're arguing for. And I think that's how both grow. Because
7 you can see absolutely on the demand side, you can see, you
8 know serious destruction to your business and your ability to
9 continue on is a growing concern if you've got to live through
10 these massive price spikes and you get, you know, positioned
11 wrong into them or something like that.

12 So I, I agree. And I think that I totally understand
13 where the other side of the trade is coming from. And to me
14 the answer is that's why we kind of -- we've kind of got to get
15 to a steady middle ground where, you know, not both sides are
16 getting screwed or one side is getting screwed for a while,
17 then the other side gets screwed, you know, and vice versa.
18 And I think, I think having this outside, more of this outside
19 supply that as a producer it's hard to know what's going on
20 with that and how to hedge against that or, you know, how to
21 deal with that exactly, it just makes everything more
22 difficult.

23 So I -- partly, too, a pitch for sunlight, you know,
24 because transparency is a good business action on this
25 situation.

1 BOARD MEMBER HUSEMAN: I like that wording. Okay.
2 And then my last component to this is can you elaborate on any
3 fragmented logistics or, you know, your outlets, I think you
4 mentioned maybe food grade is kind of where you like to go with
5 your products. Can you speak to the logistics aspect of it,
6 whether it's rail, trucked, off-farm pickup, deliver to an
7 elevator, and if you're noticing anything within your community
8 that would or would not lean toward some constraints in that
9 spectrum.

10 MR. RAIKES: The vast majority of our trade is truck.
11 That's regional truck. We don't do a lot of rail, so I don't
12 really have any comments there. You know I think a lot of
13 industries are, are seeing the same thing that's happening
14 generally in ag right now, where we had this mass inflationary
15 period and then now we're kind of in a contraction. So there's
16 a lot of pressure on the truckers. There's a lot of pressure
17 on everybody on that across a lot of different industries right
18 now.

19 BOARD MEMBER HUSEMAN: Do you truck your own products
20 or do you use third-party?

21 MR. RAIKES: We third-party the majority of it.

22 BOARD MEMBER HUSEMAN: Okay. And have you noticed
23 any changes in those -- I'm sorry, Jerry. I promise this is my
24 last component. But have you noticed any inflation or any
25 changes in the cost for, for the trucking aspect to your --

1 MR. RAIKES: Yeah, absolutely. I mean the insurance
2 stuff is crazy. The, the parts are crazy. The materials are
3 crazy. I mean fuel is moderated somewhat. But everything else
4 is, is not. I particular stated the insurance piece.

5 BOARD MEMBER HUSEMAN: Okay. Well, thank you, and
6 I'll just follow -- finish off with saying that I hear your,
7 your thoughts when we talk about the end-user and the demand
8 side of it. And we start throwing in these pieces and then,
9 you know, we get to that final price as it makes its way to the
10 door, to be processed for consumption. You don't want to lose
11 focus on that, because that makes an uphill battle for you,
12 too, to get that product there. So thanks again. Thanks for
13 farming. Thanks for -- I'm in Colorado, so not too far from
14 you. Colder weather is ahead. You're going to get that rain
15 hopefully before you get some product in the ground. Maybe
16 you've already got it there, but I really appreciate all you
17 do.

18 MR. RAIKES: No, thank you.

19 CHAIR SMITH: Okay, Jerry. Please, go ahead.

20 BOARD MEMBER D'AMORE: Hey, Justin. Nice hearing
21 from you. I, I had a tough time following some of it. But I
22 think generally speaking you were addressing the overall
23 profitability back to the farm. And then there are a lot of
24 things that, that are, are coming at you sideways that prevent
25 that. But if I listened carefully and this is just sort of a

1 yes or no question, would most of your concerns if not all of
2 your concerns be fully addressed by, quote, a level playing
3 field?

4 MR. RAIKES: Yeah, I think so.

5 BOARD MEMBER D'AMORE: Great. That, yeah, thank you
6 very much.

7 MR. RAIKES: No problem.

8 CHAIR SMITH: The devil is in the details on how to
9 get there, though, Jerry.

10 BOARD MEMBER D'AMORE: Oh, come on, school mom. Give
11 me a break.

12 CHAIR SMITH: Brian, please, go ahead.

13 BOARD MEMBER CALDWELL: Yeah, Justin, thank you so
14 much. I, I think given you kind of broaden out some of these
15 issues with, with the price volatility and, and spikes and
16 valleys. And just want -- I represent, sit in the consumer,
17 public interest chair here and just want to say that, it hurts
18 the farmers. It hurts the crop growers. It hurts the
19 livestock producers. And then it goes to the consumers, who
20 both lose faith in the product and are -- and are hit by, you
21 know, high prices.

22 MR. RAIKES: Yes.

23 BOARD MEMBER CALDWELL: So we're, we're smashing the
24 whole system when, when we have these spikes. So thank you
25 very much for, for bringing that to us.

1 MR. RAIKES: Thank you.

2 CHAIR SMITH: Okay. Thanks, Justin. Appreciate your
3 comments and for spending some time with us, today. Next up,
4 we have Jackie DeMinter, then Mark Way, and then Richard
5 Tetherow.

6 MS. DeMINTER: Good afternoon. My name is Jackie
7 DeMinter. I am a certification policy manager at MOSA. Thank
8 you for the opportunity to comment. We certify over 1,820
9 organic operations in the U.S. I'm summarizing a few points
10 from our written comments today.

11 Residue testing is an important part of verifying
12 organic integrity. And updates to residue testing requirements
13 will need to consider how to incorporate all desired residues
14 and compliance measures. It is important residue testing have
15 action levels and guidance.

16 670(b) does not seem to include collecting samples of
17 fertility inputs or livestock waste. This test -- this ties
18 into the sunset reviews for moxidectin and for fenbendazole
19 (phonetic) which asks about testing to verify compliance with
20 emergency use. We do not require test results.

21 Fecal testing is encouraged at 238(d) under fecal
22 monitoring. And we verify the pest management plan in place,
23 but testing is not required.

24 670 does not seem to open the door to require testing
25 live animal manure to verify the necessity for emergency

1 parasiticide use.

2 670(c) allows for periodic residue testing of organic
3 products and samples, can include waste. But animal manure
4 isn't our first thought of an example for this reference of
5 waste, nor is manure our first thought of organic products that
6 should be tested, either. No part of the standards seem to
7 require testing of manure for parasite load to determine
8 compliance with 238.

9 This also ties into the compost discussion. 670(b)
10 covers the testing of agricultural inputs when there is
11 suspicion of prohibited contact or methods, and does not seem
12 to include compost while the compost is being produced to
13 ensure compliance with production standards.

14 NOP Guidance 5021 introduces testing as a way for
15 certified operations to show compliance with compost production
16 requirements, but again testing is not mandated.

17 We do not support the introduction of a di minimis
18 concept in the compost evaluation, either. Synthetic compost
19 feed stock should be listed. As for compost production, it's
20 noteworthy that the majority of compost MOSA deems unrestricted
21 is based on NOP 5006 or 5021. We rarely rely on 203(c)(2).

22 The proposed mushroom standards introduce simple
23 compost production regulations. And the same simple approach
24 could be used for all compost. We encourage the compost
25 discussion to be careful not to over-regulate the farmer just

1 trying to make their own fertility inputs. Compost is second
2 only to manure as a primary input on organic operations. Most
3 policy aligns with ACA best practices for compost review.

4 Thank you NOSB for all of the work you do.

5 CHAIR SMITH: Thanks, Jackie. A couple of questions
6 here for you. Nate, please, go ahead.

7 BOARD MEMBER POWELL-PALM: Hey, Jackie. Thank you
8 for your comments. Could you sort of give us kind of a gut
9 feeling on when MOSA does their five percent operations residue
10 testing, do you feel like your testing operations that are most
11 a risk to the supply chain or do you feel like they are done
12 sort of routinely without risk being taken into much of a
13 consideration?

14 MS. DeMINTER: I think risk is very much taken into
15 our practices and procedures at MOSA. In fact, all of our
16 reviewers go through a complete risk analysis on an annual
17 basis now for all of our clients and implement -- do some
18 checkboxes in an event in our database that indicate what, what
19 a risk on operations would be and give guidance to the next
20 step in line for where that should land. And if residue
21 testing is part of that, those are very specifically flagged in
22 our database and we have reports that are ran so that our
23 inspection department can assign those out.

24 And so short answer, yes, they are based on risk
25 largely. I don't think we just randomly pick two terribly

1 operations for residue testing.

2 BOARD MEMBER POWELL-PALM: And if I might follow-up,
3 what, what is the source of the information to establish that
4 risk? Like how do you decide what, what is risky?

5 MS. DeMINTER: I think that largely depends on the
6 operation. And I would point to a public reference is the ACA
7 risk best practices, risk management -- I can't remember the
8 exact name of it, document that guides certifiers through
9 determining what risks are and on what types of operations.

10 And our system of checkboxes goes through, you know,
11 a variety of different types of risks, not only related to
12 pesticides or residue sampling, but also for other supply chain
13 factors. And now, of course, we're introducing supply chain
14 traceability audits into that for risk factoring in as well.

15 BOARD MEMBER POWELL-PALM: Would that risk matrix by
16 chance be something you could send to Michelle?

17 MS. DeMINTER: I think that it's right on the ACA
18 website available now to ACA members. And I'm not sure
19 if -- though I think Gail actually said just recently that
20 anybody could request a copy of anything and she would be happy
21 to send it to them. So -- Kyla, go ahead?

22 CHAIR SMITH: I'm happy to share it. I can get it to
23 the Board. Thanks, Jackie.

24 BOARD MEMBER POWELL-PALM: Thank you, Jackie.

25 CHAIR SMITH: Very helpful.

1 MS. DeMINTER: Instrumental and designing our overall
2 risk factoring for risk assessment on our operations. I think
3 most certifiers probably use it as a guidance.

4 CHAIR SMITH: Iteration of it for sure, yeah.
5 Mindee, please, go ahead.

6 BOARD MEMBER JEFFREY: Thank you so much. Always
7 really appreciate your comments, MOSA's comments, and the work
8 that you're doing out there. So thank you. And looking at the
9 compost question and reading your comment, I think I noted that
10 you said something along the lines of we don't want to see
11 compost become a similar circumstance as regards to ASTM
12 standards. And I was wondering if you could unpack that for me
13 a little bit. Are you saying that the ASTM standards that
14 we're already referencing are more of a composition standard
15 and the potential for using one in compost is more of a
16 breakdown standard? Or can you help me just unpack that a
17 little bit.

18 MS. DeMINTER: I'm actually just reviewing that
19 paragraph of our standards so --

20 BOARD MEMBER JEFFREY: That's fair, totally fair.

21 MS. DeMINTER: -- of our comments. I think that
22 the -- I think that what we're saying is we don't want to see
23 compost be over-regulated such that we aren't going to be able
24 to allow it. Where we ended up with the bio -- degradable
25 biowaste mulch film is a like standstill and nothing is out

1 there that's allowed to be used. And the paper pots, I think
2 just throwing that in there, that was a very long, extended
3 process to get to an agreeable position without enough
4 information at the onset of developing that. So making sure
5 that we have complete information before we start diving into
6 regulatory writing or revision.

7 CHAIR SMITH: Thanks, Jackie. Are you all set,
8 Mindee? Good, okay. Amy, please, go ahead. And then I have a
9 question.

10 VICE CHAIR BRUCH: Yeah, Jackie, thanks for your time
11 today representing MOSA's comments. As you were talking, I
12 think, answering Nate's question, I just had a question kind of
13 pop into my mind about the five percent. Right now the
14 guidance is that certified -- that we're testing five percent
15 of certified operations. When you're looking at that ACA
16 matrix and applying that to the operations that you certify,
17 are we -- is five percent kind of a low bar for testing? Do
18 like when you look at your current operations, I'm not sure how
19 many there are, but if you're backing into that ACA risk
20 assessment would it be of interest to potentially test more
21 than five percent based on the risk factors? And I'm kind of
22 coupling that with what we're hearing today from farmer
23 observations, you know, a lot more imports are coming in.
24 Yeah, I didn't know if five percent sounded like a low bar
25 based on the risk that the community feels, at this moment.

1 MS. DeMINTER: I think you're dipping into two, two
2 different subjects.

3 VICE CHAIR BRUCH: Okay.

4 MS. DeMINTER: One is the five percent standard that
5 we have to comply with to do five percent of our operations
6 with residue testing particularly. But the risk assessment
7 template, if you will, that I'm referencing from ACA is --
8 engages a whole lot of other risks on whether or not we should
9 do unannounced inspections on those operations, which of course
10 pesticide residue and sampling can come into, you know,
11 unannounced inspection protocol.

12 But we're looking at the risk assessment as a
13 guidance for determining who we go and do unannounced
14 inspections on, which there again is a five percent
15 requirement. So we have that five percent requirement and then
16 also the five percent requirement to do residue testing on five
17 percent of our operations. And for MOSA, you know, that lands
18 us a -- didn't do the math with exactly where we're at, but you
19 know 100 and some operations. And we, as a certifier, high,
20 high -- estimate high for how many we need, because there is
21 always the circumstance where you can't collect it, the
22 inspector forgot to collect it. There are things that we bump
23 up against.

24 But if it's a residue test that we're doing for
25 measuring, or for, for a complaint, or a surveillance

1 investigation of some sort, we're always, you know, collecting
2 that. And it's counting toward our five percent overall, but
3 we're still going out and collecting that, even if we have
4 already met our five percent and we need to do more, go above
5 the five percent in order to do the evaluation or the
6 investigation. Does that answer your question?

7 VICE CHAIR BRUCH: Yeah, that's helpful. Thank you.
8 Appreciate that.

9 CHAIR SMITH: Okay. Jackie, my question, I don't
10 think MOSA commented on the TR template, if I'm remembering
11 correctly, but I'm going to ask you anyway. So any thoughts on
12 any of the additional questions on the TR template? Would they
13 be helpful in material review? Just what's your hot take?

14 MS. DeMINTER: How about I give that some, some
15 thought after this meeting. And I would be happy to send you
16 more comments on that. It wasn't a document that we dove into
17 and prepared comments on. And I want to think like improving
18 the template for gathering, you know, and reporting appropriate
19 information, we use those TR template, you know, the TRs as a
20 resource for gathering material, you know. So we're often
21 referencing those.

22 And one of the things that I personally like that
23 came into it recently is ancillaries and other ingredients, and
24 including anything of concern there. But I would be happy to
25 look at that specifically to other questions, Kyla, and offer

1 more detailed feedback.

2 CHAIR SMITH: So thanks so much. If you have more,
3 anything, any other thoughts, yeah, please feel free to pass
4 that along to Michelle and she can get it to the Board.
5 Appreciate it. Thanks so much for your comments, today. Okay,
6 next up we have Mark Way, then Richard Tetherow, and then Emily
7 Musgrave. Mark, if you could just state your name and
8 affiliation, and then you could get started.

9 MR. WAY: You bet. Hi, good afternoon. My name is
10 Mark Way. I'm the president and CEO of York State Bank. We
11 are a community bank located in Nebraska, and part of a group
12 of nine banks. If all of our group was rolled into one bank,
13 we'd be the number three ag lending bank in America by volume.

14 Today, I'd like to give you a banker's perspective on
15 financing organic farming operations and the critical nature of
16 commodity pricing. As with any lending, cash flow is critical.
17 As bankers, we spend time analyzing both the current production
18 cycle, as well as future cycles to ensure that short and
19 long-term debt obligations can be serviced. We have found
20 organic prices and practices lead to higher breakeven points
21 than what we see in conventional farming. Thus, there's a
22 necessity for the presence of premium pricing in the
23 marketplace.

24 These higher break evens are a result of a
25 cost -- higher, larger cost structure. I'll highlight just a

1 few of those. One primary example is weed management.
2 Adequate weed control measures dictate more intensive efforts
3 equating to more passes through each field. Consequently, this
4 increase is time allocation for field management and labor, as
5 well as greater fuel cost. This also leads to an increase in
6 wear and tear on equipment, in turn representing higher
7 expenses from frequent repairs and replacement. In addition,
8 investment in extra equipment is often necessary in an
9 operation to meet the narrow windows of time available for
10 adequate weed control.

11 Some other key cost differences from conventional
12 agriculture show up in fertility sourcing and crop inventory
13 delivery. Input and delivery channels create added
14 transportation expense due to the lack of local access points.
15 But more significant than that, facilities cost for storage can
16 be much greater. We see fertilizer being sourced earlier and
17 the need for crop inventory to be held longer. In fact, as
18 lenders we often finance three separate production cycles
19 within the same calendar year as we finance the crop growing in
20 the field, last year's crop in storage, and next year's inputs.

21 Given the cost structural differences, our concern
22 looking forward is primarily in market prices. In general,
23 organic producers face greater uncertainty in pricing. There's
24 no track or board of trade. This means less market efficiency
25 and fewer hedging tools available. Therefore, it is imperative

1 that adequate price premiums for organic products are present.

2 Whether your point of view is macro or in my case
3 it's more micro, as we work directly with local producers, a
4 serious threat to the sustainability of American organic
5 farming is inequitable market place. It is imperative that we
6 ensure the integrity of organic imports. We must have
7 standards that preserve a level playing field for domestic and
8 foreign products.

9 Foreign producers are facing similar high cost
10 constraints, as outlined earlier. And as a result, it's not
11 practical for other nations to profitably deliver imports at a
12 lower price point than our U.S. producers. If they can,
13 something is amiss.

14 CHAIR SMITH: Thank you, Mark, for your comments.
15 Any questions for Mark? Nate, please, go ahead.

16 BOARD MEMBER POWELL-PALM: Mark, I just want to say
17 thank you so much for joining us today. It really calls to see
18 someone in your position paying attention to our community. If
19 I hear you right, your concerns echo the concerns of many of
20 the farmers that we heard from today, that we need to get --

21 MR. WAY: Certainly.

22 BOARD MEMBER POWELL-PALM: -- to get price
23 stabilization if we're going to see capitals stay and helping
24 organic grow. Is that right?

25 MR. WAY: Absolutely, absolutely. We see a lot of

1 producers. They -- it requires a little bit more leverage, as
2 I outlined with the need for multiple operating lines and so
3 forth like that. There's the financing needs can be greater,
4 especially bridging the gap over the through the transition
5 years and so forth like that, that having a stable price
6 environment is going to be critical, you know, for the long
7 run.

8 BOARD MEMBER POWELL-PALM: Absolutely. Really
9 appreciate you being here with us, today. I'll hand it off to
10 Franklin. Thank you.

11 MR. WAY: You're welcome.

12 BOARD MEMBER QUARCOO: Yes. Mark, very interesting
13 presentation. Now how labor cost factor into some of this
14 input, imports that come into the country like labor costs?

15 MR. WAY: Well, I guess I can't speak to the, the
16 import. But on, you know, at the local level, what we see from
17 the labor standpoint is, as I mentioned, the, the need to be in
18 the field more frequently elicits more, more labor cost. The
19 surveying of the fields, being out there, making sure that all
20 of the, the practices are being conducted on a timely basis
21 elicits more labor.

22 And then to the point of weed control, at times weeds
23 will sometimes get outside of the parameters that we like to
24 see on the production side, in which case then we kind of go
25 back to the old school manual labor, people walking through the

1 fields and physically removing the -- removing the weeds so
2 that the -- they're not competing with the crop that's trying
3 to be raised.

4 BOARD MEMBER QUARCOO: Okay. So you are not trying
5 to look at the cost of production domestically compared to
6 international, because I thought --

7 MR. WAY: No, no.

8 BOARD MEMBER QUARCOO: -- that's something about
9 price point and I don't know whether you saw that in labor cost
10 outside the United States versus here.

11 MR. WAY: No. I can't -- no, not in regard to that.
12 But as, as you -- as we compare our local producers that are in
13 the, the conventional farming practices versus organic, we see
14 a much larger labor cost for the organic production locally.

15 BOARD MEMBER QUARCOO: Thank you.

16 MR. WAY: You're welcome.

17 CHAIR SMITH: You've got a couple more questions
18 coming your way, Mark. Kim, please, go ahead.

19 MR. WAY: Okay.

20 BOARD MEMBER HUSEMAN: There I go. Thank you, Mark,
21 for your comments to day. I really appreciate --

22 MR. WAY: You're welcome.

23 BOARD MEMBER HUSEMAN: -- your lens in the space. As
24 we talk about some of the risk management tools that organic
25 farmers have or the lack thereof, what are your thoughts on

1 other hedging mechanisms that could be employed to help farmers
2 other than a back-to-back sale. I know we talked about Chicago
3 Board of Trade not being an effective tool today. But if there
4 were some kind of a mechanism from that pricing structure to
5 hedge risk, do you think that that could be beneficial to this
6 community?

7 MR. WAY: Absolutely. One of the things that, that
8 we see and I, I touched on briefly was the fact that the
9 storage of the inventory sometimes can be a little bit longer
10 than we see on the conventional side. And part of that has to
11 do with the premium that can be obtained by giving up
12 optionality and the marketing of the product. It can -- that
13 can present itself in buyer calls and that type of thing. And
14 so it puts, puts the producer in a position where they don't
15 necessarily know what their cash flow is going to look like as
16 they go through the year. And if those deliveries get pushed
17 further and further into the year, there's carrying costs with
18 that. There is also potential loss in the quality of, of the
19 product that's been stored.

20 And so there, there is added risk in there that a lot
21 of times you don't see again on the -- on the conventional
22 side. And any, any ways to mitigate risk is going to be -- is
23 going to have value to the end producer.

24 BOARD MEMBER HUSEMAN: Thank you. And I hear that
25 loud and clear. We're talking about price volatility and

1 trying to find mechanisms to, you know, minimize the swing in
2 that pendulum to create an environment. And I think there's
3 multiple facets to it. And that's why I think having the, the
4 lens from your perspectives on this side of it's so important.
5 So thanks, again.

6 MR. WAY: Thank you.

7 CHAIR SMITH: Jerry, please, go ahead.

8 BOARD MEMBER D'AMORE: Yeah, I actually took my hand
9 down because I, I was going down the same path that Franklin
10 was going to go down. I, too, thought I heard that the -- that
11 the overseas was saddled with the same kind of issues that we
12 are. And while that may be true, they're, they're vastly
13 different. And Franklin, I think, hit the biggest one which
14 is -- which is labor. There's also inputs. There's also
15 in-country regulations. At the end of the day, cheating is
16 highly worthwhile for these people.

17 MR. WAY: Unfortunately, yes.

18 BOARD MEMBER D'AMORE: Yeah.

19 CHAIR SMITH: Thanks, Jerry. Logan, please, go
20 ahead.

21 BOARD MEMBER PETREY: Thanks, Jerry. I'm glad you
22 asked that question, because I was just going to hit on part of
23 Franklin's and the labor would be a big thing. And then just
24 kind of give perspective on a corn crop here, this is without
25 hand weeding, but it's looking like it's only maybe 10 percent

1 or less of the total cost of production. And so even though
2 the biggest thing, variance between countries, third world
3 country or here where the labor would be huge on that variance,
4 it shouldn't affect the total input cost, that line item at
5 least. Now if you're hand-weeding, you're going to bump up to
6 25, 30 percent more. But that's just to give an idea.

7 CHAIR SMITH: Thanks so much. Thanks for your
8 comments, Mark, and for spending some time with us, today.
9 Okay. Up next we have Richard Tetherow, which, Richard, are
10 you on the line? I think we're not finding you.

11 MS. ARSENAULT: I don't see Richard in line with us.

12 CHAIR SMITH: Okay. I'm going to do a circle back
13 round at the end of the -- of the list here, which is a couple
14 of people to get -- just do one last sweep for anybody who we
15 might have missed today. So if no Richard, then Emily Musgrave
16 is next, then we have Walter Goldstein, and Robin Olson.
17 Emily, you can state your name and affiliation, and then get
18 started.

19 MS. MUSGRAVE: Can you hear me, okay? Great. Good
20 afternoon. My name is Emily Musgrave. I'm the Organic
21 Regulatory Manager at Driscoll's. For those of you that don't
22 know, we have independent growers who grow berries, both
23 organic and conventional, strawberries, raspberries,
24 blueberries, and blackberries.

25 So as always, I would like to thank the NOSB for

1 their tremendous commitment by serving on the Board. My
2 comments focus on the continued allowance of the following
3 materials: hydrogen peroxide, horticultural oils, pheromones,
4 ferric phosphate, potassium bicarbonate, and magnesium sulfate.

5 Additionally, I am a voluntary member of the
6 International Fresh Produce Association, IFPA's organics
7 committee. And Driscoll supports the comments made by IFPA.

8 Driscoll supports the continued listing of hydrogen
9 peroxide for use in organic production as both an algicide,
10 disinfectant, and sanitizer, as well as plant disease control.
11 Hydrogen peroxide is widely used by Driscoll's growers for
12 cleaning irrigation lands. It is an essential tool for
13 dripline maintenance for organic growers. It is widely used by
14 growers as an IPM practice for plant disease control, as it
15 kills spores in fungal colonies.

16 Driscoll supports the continue listing of
17 horticultural oils for use in organic production as they are a
18 critical tool for the organic industry as a whole. The entire
19 organic industry is dependent on horticultural oils. These
20 oils are an integral part of the IPM strategy as they kill
21 fundal pathogens and insects.

22 Driscoll supports the continued listing of pheromones
23 as an approved material on the National List as a tool for
24 insect management. Pheromones are the primary way organic
25 growers control many different species of moths. The use of

1 pheromones as a mating disrupter is a principal way organic
2 growers combat the light brown apple moth and many other
3 invasive pests.

4 Driscoll supports the continued listing of ferric
5 phosphate in organic production. Many growers use ferric
6 phosphate as slug and snail damage is prevalent across all four
7 berry types. Ferric phosphate is an integral component of
8 growers' IPM strategies.

9 Driscoll supports the continued listing of potassium
10 bicarbonate in organic production. Potassium bicarbonate is
11 used as a fungicide to control powdery mildew across all four
12 berry types, but it's extremely important in strawberries.
13 Potassium bicarbonate is a key rotational product with sulfur
14 and oils particular to decrease plant stress. Potassium
15 bicarbonate is also an essential component to organic growers'
16 IPM strategies.

17 Driscoll supports the continued listing of magnesium
18 sulfate as an approved material on the National Organic List.
19 Magnesium fertilization is critical to plant health across all
20 berry types. The plants will suffer without the proper levels
21 of magnesium.

22 And I also just wanted to say thanks for hanging in,
23 everybody. I know this is late in the day. So thanks to the
24 Board and just thanks to the National Organic Standards Board
25 for the opportunity to comment and their commitment to

1 protecting the integrity of the program.

2 CHAIR SMITH: Thanks so much, Emily. Any comments or
3 questions for -- not comments, questions, questions I need for
4 Emily? I don't see any. So thank you, Emily, for your
5 comments today and have a good rest of your day. Thanks for
6 being with us.

7 Okay. It looks like we have a handful of speakers
8 that are signed up. I don't think that several of them are
9 here. So I think Brian Baker maybe is next on deck, because I
10 think -- I'm just going to read who is on my list, but I think
11 we couldn't find them. Walter Goldstein, Robin Olson, and Ron
12 DeBoer, I think are all not here. I'm going to do one final
13 sweep.

14 Okay, great. So Brian Baker is up next. And then
15 Ron DeBoer will be after Brian. And then I'll sweep one final
16 time for anybody we might have missed. And then that will get
17 us through the end of the day. So, Brian, please state your
18 name and affiliation, and you can go.

19 MR. BAKER: Well, I didn't expect to be up so soon.
20 Thanks. Thanks for the opportunity to address you. Brian
21 Baker, Bellcare & Concerns (phonetic), Eugene, Oregon. Please
22 consider my written comments submitted with Chuck Benbrooks.
23 Today, today's comments are around the discussion papers
24 residue testing for the global supply chain and inert
25 ingredients in organic pesticide products.

1 Key points. A growing body of scientific evidence
2 supports the health claim that organic foods significantly
3 reduces dietary risk from exposure to pesticides relative to
4 conventional food. However, fraud, negligence, and unavoidable
5 circumstances all mean that organic food is not pesticide
6 residue free. Organic certifiers have a growing database of
7 pesticide residues found in organic food. Analysis of that
8 data can target sampling of crops and pesticides that pose the
9 greatest risk to the eaters of organic food.

10 Many positive samples of organic food are for post-
11 harvest chemicals that are evidence of either co-mingling or
12 improper handling. It is easier to buy conventional food and
13 sell it as organic than it is to grow conventional food and
14 sell it as organic. Glycosylates, metabolites and EPA
15 registered plant pesticides that are transgenic crops are
16 missing in the current guidelines and discussion documents.

17 Unavoidable residual environment contamination needs
18 to be addressed. The FDA does not handle samples labeled as
19 organic any differently from any other samples. The FDA does
20 not inform the NOP and responsible certifiers when the FDA
21 finds a sample labeled as organic that tests positive. The FDA
22 does not enforce the NOP threshold of five percent EPA
23 contamination for products labeled as organic and regards that
24 as USDA's responsibility.

25 The FDA should report to the USDA and to the

1 respective certifiers when they discover pesticides in organic
2 food. The USDA and its accredited certifiers should
3 investigate FDA's reported findings. The USDA should
4 acknowledge the growing body of scientific evidence that
5 supports the claim that organic food is safer than conventional
6 food. Organic food must meet all safety requirements for all
7 food, and on top of that is required by law to provide greater
8 protections to human health from pesticides and other human
9 health risks.

10 Regarding inert ingredients or as I prefer to call
11 them co-formulants, my key points are registrants and the EPA
12 need to cooperate with the NOSB so it can make informed
13 decisions about what ingredients are being asked to be added to
14 the National List. The process requires full transparency and
15 public access to information regarding the ingredients in
16 question. Once the EPA and registrants agree to cooperate with
17 the NOSB, it will then be possible for the public to engage in
18 the long overdue task of identifying what co-formulants meet
19 organic standards.

20 Thank you for your service. I welcome your
21 questions.

22 CHAIR SMITH: Thanks so much, Brian. I see a
23 question from Dilip. Dilip, please, go ahead.

24 BOARD MEMBER NANDWANI: Thanks, Brian. I really
25 appreciate your portion. You talked some time on some of the

1 topics in the past. But this topic, organic pesticides in
2 organic food is very interesting and also important, because
3 any common consumer of organic food, he or she, they have the
4 understanding that it's pesticide-free. So this is, to me, is
5 an important area.

6 You mentioned I believe some of the reasons why we
7 have this pesticide residue in organic food. But can you a
8 little bit provide more for your insights, top two or three
9 reasons pesticides coming into organic food? Is it because of
10 use or organic pesticides by farmers in the community or is it
11 from the dirt from the sort of duster plane, or the
12 neighboring, you know, farmers? Or what could be the possible
13 top two or three reasons. Thank you.

14 MR. BAKER: Okay. Thank you, Dilip. Yes, with my
15 experience as, as working in certification, as well as doing
16 research, the three main reasons, the first would be drift or,
17 you know, what, what the neighbors are doing.

18 The second, which I mentioned, is post-harvest
19 handling where, for example, diphenylamine is a post-harvest
20 treatment for apples. And we've known for over 20 years that
21 DPA volatilizes at low temperatures and controlled atmosphere
22 storage. If you have organic and conventional apples that have
23 -- that have been treated with DPA, the organic apples are
24 going to test positive if they're in the same chamber. We know
25 that. It's avoidable.

1 Another reason, you know, is legacy pesticides such
2 as DDT, cording, you know, these persistent, some call the
3 forever chemicals, that translocate from the soil into certain
4 crops. We've known for 40 years that if you have DDT in the
5 soil, you're going to -- potatoes and carrots are going to
6 accumulate those pesticides. We can test the soil for the
7 presence and avoid planting organic crops in that soil. It's
8 avoidable.

9 Finally, you know, it's fraud. And some of these
10 samples are very hot. Any, any time you see more than one
11 pesticide residue in a crop, that should be a red flag. That
12 should be evidence that deliberate -- these pesticides are
13 being applied deliberately. And, you know, I haven't done a
14 thorough analysis of the FDA data, but, you know, there's some,
15 you know, there are some samples that have come in to FDA that
16 are, are labeled organic.

17 FDA doesn't report those results for a good two
18 years, doesn't make the data available on their website for a
19 good two years after the samples have been run and the results
20 are back. So we're missing out on a big chunk of evidence that
21 fraud is being committed by not working with the FDA and
22 getting, getting their data.

23 BOARD MEMBER NANDWANI: You mentioned DDT. It is
24 banned. But do you think that still it is coming for one or
25 other sources and it is data or information service there?

1 MR. BAKER: There is DDT being used in, in other part
2 of the world.

3 BOARD MEMBER NANDWANI: Okay.

4 MR. BAKER: How much and in what specific countries,
5 you know, there are other organochlorines where, you know, DDT
6 may have been banned in those countries, but they're still
7 using BHC or toxaphene, other, other organic chlorines that are
8 going to come into certain crops. And, you know, that, that
9 can be a problem with something like ginger, for example. You
10 know, you're growing root crops in tropical conditions.

11 Yeah, so, you know -- but, yeah, I mean DDT that was
12 applied in the -- in the 1960's is still turning up in organic
13 crops.

14 BOARD MEMBER NANDWANI: Yeah. That was the cause of
15 this, you know, in the bald eagle, we all know that. Some of
16 the vegetables and fruits, they have high organic fruits and
17 vegetables, they have a high pesticide residue. And a lot of
18 consumers, they told me that they don't want to buy because
19 then they learn. And you mentioned organic apple. And I think
20 a couple of other vegetables I would say is the sweet pepper,
21 also. Do you know about --

22 MR. BAKER: Yeah, sweet -- yeah, you know,
23 we -- there was one sweet pepper sample, it was actually frozen
24 sweet peppers that came up from Mexico. And there were like 17
25 different residues on, on that sample. It was labeled organic.

1 Why? And again that was, you know, that was in 2022. It
2 wasn't until 2024 when those results were reported. So those -
3 - that food was long gone.

4 BOARD MEMBER NANDWANI: Thank you for coming. I
5 appreciate it.

6 MR. BAKER: Thank you.

7 CHAIR SMITH: Thanks, Brian. Yeah, appreciate your
8 comments today. Thanks for joining us. Okay. Up next I think
9 we have Ron DeBoer. Ron, are you there? I heard you're here.

10 MS. ARSENAULT: Yeah, Ron is on the phone. Ron, you
11 might have to hit star-6 to unmute yourself.

12 (Pause.)

13 MR. DeBOER: Okay. Can you hear me?

14 CHAIR SMITH: Yes.

15 MR. DeBOER: Am I on?

16 CHAIR SMITH: Yes, you are here. Yes, so please
17 state your name and affiliation, and then you can get started.

18 MR. DeBOER: Yes. My name is Ron DeBoer and I am an
19 organic farmer in Nebraska. I am, you know, Justin talked
20 earlier, I have been organic farming corn and beans for
21 probably the last five or six years. And within them five or
22 six years, the price was really good. I was able to keep going
23 and keep my farm operating, because I was able to rely on the
24 organic stuff that I sold.

25 I'm at the point now where organic is down and the

1 price of soybeans and corn is down in organic. And I'm trying
2 to bring attention to the price of organic in soybeans due to I
3 think we have too much imports. And I think we need to make
4 stricter regulations on imports, because it's an unfair market.
5 Some of the imports are coming in less than cost of production.

6 There does not seem to be a good handle on preventing
7 fraudulent imports in the discussion documents being presented
8 by the CACS. Committee is a great start. Crop insurance has
9 gotten better in organics and we're grateful that you all have
10 a healthy highlight of that in the areas where farmers would be
11 able to improve.

12 But we need to grow organic markets. And I think the
13 best way probably to do that is not to bring in so much imports
14 and to rely on the farmers in the United States to take care of
15 everybody, because I think if more people see what the price is
16 and see that we're supporting our farmers around here, I think
17 it would improve on a lot of other farmers wanting to get into
18 it. Thank you.

19 CHAIR SMITH: Thanks, Ron, for your comments. Any
20 questions for Ron? I just have one comment that I was going to
21 make and I appreciate all the farmers that are coming to speak
22 -- to speak about struggles with imports. And I can -- I've
23 heard that the time is -- like there is a real urgency. And I
24 know that there are some things that happened within the
25 strengthening organic enforcement rulemaking that will take

1 some time to roll out and to, to see the impact of.

2 And so, but I did just want to highlight that every,
3 every import that is coming into the country is now going to be
4 required to have an NOP import certificate. And certifiers are
5 going to need to have processes in place for issuing those with
6 accurate information. And NOP is going to be focusing on that
7 in our accreditation audits. It's a major focus.

8 So I know that it's like not going to happen fast
9 enough, I think, you know, for a lot of folks. And I just
10 wanted to, to highlight that is coming and it is -- anyway,
11 hopefully it will be impactful for fraudulent imports and
12 cheaters that are out there, that there's going to be some
13 operations and perhaps certifiers existing the market.

14 So, anyway, Jerry, please, go ahead.

15 BOARD MEMBER D'AMORE: Yeah. Thank you for that
16 comment, too. I guess what also has to be said particularly as
17 we're talking about limited time and, and getting something
18 done is that this is not the right forum for anything other
19 than the -- than the SOE and, quote, leveling the playing
20 field. If we want to start talking about limiting what comes
21 into this country, this is not the body to talk to. Thanks.

22 CHAIR SMITH: Thanks, Jerry. Okay. Any other
23 comments or questions for Ron? Thanks, Ron, for sticking with
24 us and for your comments today.

25 MR. DeBOER: I do have a question.

1 CHAIR SMITH: Okay. I don't know if we're
2 entertaining questions. This is a -- this is a speak and then
3 we ask the speaker questions. But --

4 MR. DeBOER: Who would I -- he said you're not
5 the -- who, who should I go to, senators and that kind of
6 stuff?

7 CHAIR SMITH: Yeah, I think that's a bigger issue
8 beyond our authority to have any impact on trade relations.
9 So, yeah, I'm not sure the best person to reach out to. A
10 congress person might be a good start.

11 MR. DeBOER: Okay. Thank you.

12 CHAIR SMITH: Yep, you bet. Okay. Our last speaker
13 may be Tony Michaels. I'm aware that Tony is on the line. And
14 I'm going to then do one final sweep to see if we -- if anybody
15 else has joined us. But, Tony, are you there?

16 MR. MICHAELS: Yes, I am.

17 CHAIR SMITH: I believe Tony -- okay, perfect.

18 MR. MICHAELS: Yep, yep.

19 CHAIR SMITH: Awesome, great. Okay, Tony, state your
20 name and affiliation, and then you can get started.

21 MR. MICHAELS: Tony Michaels. I'm with EVEA Farm
22 Management. We farm in, in Western Nebraska. I don't know
23 what it is about Nebraska people, but we talk about the same
24 few topics, it seems. So I'm not on the trade limitation side
25 of things, but I do think we can continue to speed up and do a

1 better job on measuring the, the crops, the organic certified,
2 or apparently organic crops that are coming in from overseas.
3 We should be making a lot of direct measurements at the port of
4 entry.

5 We should -- I think there's a lot of things we can
6 continue to do to cut down on the likelihood that there is
7 fraud coming from overseas. The fluctuations in that source
8 just seem too, too nonlinear compared to the farming practices
9 to be, be completely just due to agricultural supply and demand
10 kind of things. So I think if we can -- if we can do that,
11 that would be great.

12 And then I'd like to reiterate and I forget what the
13 person's name was from the insurance company earlier on in the
14 day that, that we -- there is no -- if you're farming
15 transition, you're going through the same practices as your
16 going to use for organic, you should be able to count that
17 improvement towards your, your yield when you're calculating
18 your APH for, for organic. And it seems like that's a pretty
19 logical thing to, to do, and just sort of help us get to good
20 yield goals for the, the insurance products when, when we're
21 organic.

22 And so I'd just like to support both of those things
23 and thank you very much for doing such a great job. And sorry
24 for keeping you here longer than the end of the program. So
25 thank you.

1 CHAIR SMITH: Oh, you did nothing of the sort, sir.
2 It's all these fellow board members who just have so much to
3 say and ask people about. But we really appreciate you
4 sticking with us. Kim, please, go ahead.

5 BOARD MEMBER HUSEMAN: All right. Unapologetically,
6 we're going to spend more time. And thank you, Tony, for being
7 here today and giving your comments. As a fellow border state
8 farmer, I grew up in Southeast Wyoming, farming in the sand
9 hills.

10 MR. MICHAELS: Mm-hmm.

11 BOARD MEMBER HUSEMAN: Tell me a little bit about as
12 an organic farmer in Western Nebraska, how do you transport
13 your products to market? And any kind of bottlenecks or
14 fragmented infrastructure to the logistics component to moving
15 organic products?

16 MR. MICHAELS: Yeah, so when we set -- because we
17 took over these acres only a few years ago and we're in the
18 latter stages of transition for it, though our team has farmed
19 in other parts of Nebraska for years. We thought that through
20 by design. And so we -- a good chunk of our crops are going
21 into feeding cattle and organic grass-finished cattle to be
22 processed at that Gordon slaughterhouse facility. So that was
23 part of getting a plan that matches the, the geography.

24 Otherwise, yeah, the logistics of moving the stuff
25 around are, are a royal pain. And that's one of the limits to

1 making these choices. It's a great place actually to do
2 organic grow crops. But it is challenging from the cost and
3 infrastructure standpoint.

4 And the other things we're doing is for ingredients
5 that we're looking at creating out of some of our crops where
6 we would do some of the secondary processing onsite. The nice
7 thing, this area is challenging because of the ability to get
8 fertility is limited, and so being able to do beef and actually
9 walk those animals onto the pivots at various parts in the
10 rotation allows us to get some of that fertility back.

11 But, but we do want to create some very specific sort
12 of plant protein ingredient thing where we can get a value-add
13 on the farm and then it's a smaller volume of higher, higher
14 value corp. But it's something you've got to think about ahead
15 of time. Because if you just randomly go into a spot and start
16 growing, and hope that there is some way you can get it to
17 market, you know, you're setting yourself up for some
18 challenges.

19 BOARD MEMBER HUSEMAN: That's right. And having a
20 complimentary rotation program that can feed into those
21 livestock diets as well, I understand the challenges and with
22 you luck in your -- in your planting this spring. And thank
23 you again for your comments, today.

24 MR. MICHAELS: Thank you, guys.

25 CHAIR SMITH: Thanks, Tony, for, yeah, circling back

1 around here. I'm glad we were able to catch you. Okay. I'm
2 going to do one final call for everybody that we missed today.
3 So if you're on the phone, star-6 to unmute. This is your
4 change. Michael -- I'm sorry, Matthew Fitzgerald?

5 (No response.)

6 CHAIR SMITH: Grant Marcuccio?

7 (No response.)

8 CHAIR SMITH: Klein Njoume?

9 (No response.)

10 CHAIR SMITH: Courtney Lorenz?

11 (No response.)

12 CHAIR SMITH: Derrick Nyirenda?

13 (No response.)

14 CHAIR SMITH: Zach Porter?

15 (No response.)

16 CHAIR SMITH: Richard Tetherow?

17 (No response.)

18 CHAIR SMITH: Walter Goldstein?

19 (No response.)

20 CHAIR SMITH: Rob -- Robin Olson?

21 (No response.)

22 CHAIR SMITH: Okay. I think this concludes our
23 public comment webinar for today. Thank you all who provided
24 comments to the Board today and for sticking with us. We
25 didn't do too bad, only 22 minutes over. We will reconvene on

1 Thursday, April 25th, at 11:00 Eastern. And thanks Board
2 members for all of your questions and for your attention. We
3 did it.

4 (Whereupon, at 5:22 p.m., the Webinar was adjourned,
5 to reconvene on Thursday, April 25, 2024 at 11:00 a.m. EST.)

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CERTIFICATION

This is to certify that the attached proceeding before the:

NATIONAL ORGANIC STANDARDS BOARD

IN THE MATTER OF: SPRING 2024 PUBLIC COMMENT WEBINAR

PLACE: ZOOM

DATE: April 23, 2024

was held according to the record, and that this is the original, complete, true and accurate transcript which has been compared to the recording accomplished at the hearing.



Elaine M. LaRosee, CDLR
Official Reporter

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UNITED STATES DEPARTMENT OF AGRICULTURE

NATIONAL ORGANIC PROGRAM

NATIONAL ORGANIC STANDARDS BOARD (NOSB)

SPRING 2024

PUBLIC COMMENT WEBINAR

Thursday,
April 25, 2024
11:00 a.m., EST
Day 2

1 National Organic Standards Board (NOSB) Members

2 Kyla Smith, NOSB Chair

3 Amy Bruch, NOSB Vice Chair (Virtual)

4 Nate Lewis, NOSB Secretary

5 Brian Caldwell

6 Jerry D'Amore

7 Carolyn Dimitri

8 Kim Huseman

9 Mindee Jeffery

10 Allison Johnson

11 Dilip Nandwani

12 Nate Powell-Palm

13 Logan Petrey (Virtual)

14 Franklin Quarcoo

15 Wood Turner

16 Javier Zamora (absent)

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USDA/National Organic Program Staff
Jared Clark, Acting Assistant Director, and
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
Michelle Arsenault, Advisory Committee Specialist

P R O C E E D I N G S

(Time: 11:00 a.m.)

1
2
3 MS. ARSENAULT: Welcome, folks. I think everybody is
4 in from the waiting room. Looks like we have about 47 people
5 online with us at the moment. We'll get started in just a
6 second. I know it's early on the West Coast for some. It's
7 early on the East Coast for me. Let me get one of the Board
8 members also here.

9 All right. Okay. If everybody is ready, I think I
10 have the top of the hour, 11 o'clock Eastern time, 8 Pacific.
11 We'll get started.

12 We're going to reconvene the meeting from Tuesday
13 where we recessed for the evening. Thank you for joining, by
14 the way, the public comment webinars. This is Day Two of the
15 two-day comment webinar, and then we will continue the meeting
16 next week in person in Milwaukee where the Board will be doing
17 all their business, Board business, and voting, and et cetera.

18 So if you're online with us, you should see an
19 instruction slide. If you're on the phone only, I'm going to
20 go ahead and summarize briefly. So for attendees, you're going
21 to be in mute, and unable to mute yourself during the call.
22 The chat is enabled, though. You'll find the chat button in
23 the center of the Zoom task bar so you can chat with each other
24 or relay technical difficulties to NOP.

25 Chats are not part of the public record, and I think

1 Andrea just added the phone numbers dial in and how to go about
2 reporting technical difficulties. She put that in the chat for
3 you guys. So chats are not part of the public record and are
4 not a public comment. The Board members will not be answering
5 questions in the chat, but you're welcome to say hello to each
6 other and chat with each other there.

7 Closed captioning is available in Zoom. If you click
8 the live transcript or the CC button -- it's kind of to the
9 right in the Zoom task bar -- you can control your own view.
10 You can turn captioning on or off. You can change the font
11 size. And Zoom just launched a bunch of different languages,
12 so you can change the language that you want to see, and if you
13 change it for yourself, you won't change it for everyone else,
14 so don't worry about that.

15 Please don't use the raised hand feature which you'll
16 find in the Zoom task bar as well. All commenters had to
17 register ahead of time, and the Board chair will call on them
18 in turn.

19 You can customize your own view in Zoom, so you can
20 rearrange what you see on your personal screen by going to the
21 upper right corner and finding the view button. You can toggle
22 between gallery view, speaker view. And also when we share
23 slides, if you go to exit full screen, it won't take over your
24 whole screen, and, again, it won't change anything for anybody
25 else in the meeting, just for your personal view. We are going

1 to spotlight the speaker timer for everyone, which is in my
2 Zoom tile, so that should remain on your screen no matter what
3 view you are using.

4 If you're having technical problems, you can visit
5 support.zoom.us, or you can log off the meeting and log back in
6 which usually fixes the majority of problems. The webinar is
7 going to be recorded. I haven't started the recording yet, but
8 I just did. And we don't post the recording. We don't save
9 the recording or post the recording. We just have it as sort
10 of a backup. But we will have a full meeting transcript that
11 we'll post to the NOP website as soon as the meeting is over
12 and the transcript's available. The transcriptionist is on the
13 call with us today.

14 All right. So speakers, please make sure that your
15 name is displayed in your video tile so we can locate you when
16 it's your turn to speak. If you happen to be on the phone only
17 with us, we may reach out to you via the chat to make sure
18 that's your phone number so we can mute and unmute you when it
19 comes time for you to speak, so keep an eye on the chat box in
20 case we have to reach out.

21 So we will ask you to unmute when you are called. So
22 you might see a pop-up on the screen that says the host has
23 asked you to unmute yourself. So you can unmute yourself and
24 turn your camera on if you want. Cameras are optional. You
25 don't have to be on camera.

1 Both the mic and the camera widgets are on the bottom
2 left side of your Zoom taskbar and also next to your name in
3 the participant list under the ellipsis of the three dots. If
4 you're on the phone only, and you don't have a mute button on
5 your phone, you can use star six to toggle between mute and
6 unmute.

7 So when you come to the mic, we ask that you please
8 state your name and affiliation for the record at the start of
9 your comment. Kyla's going to remind you of that throughout
10 the day. Each commenter will have three minutes to speak, and
11 we're going to use a timer that will sound when your time is
12 up. When you hear the beep, please finish your sentence. And,
13 again, the timer will be visible in my Zoom tile, which we'll
14 pin to the screen.

15 Now I'm going to turn the mic over to Jared Clark,
16 the National List Manager and Acting Assistant Director of the
17 Standards Division, for a few welcoming remarks.

18 Jared.

19 MR. CLARK: Thank you, Michelle. Hello again,
20 everyone. I'm Jared Clark, the Acting Assistant Director of
21 the Standards Division in the National Organic Program. Like
22 Michelle mentioned, today is a continuation of our two-day
23 public comment webinar. Welcome back to those who attended on
24 Tuesday, and welcome to those who are attending for the first
25 time today.

1 We continue to be grateful for our ability to engage
2 in these virtual sessions which allow people to participate
3 from wherever they are. I think we saw some people calling
4 from Tractors on Tuesday. That was nice to see. Thank you all
5 again for engaging in this process to shape policy.

6 After today's webinar, we will reconvene next week in
7 Milwaukee, Wisconsin, in person. We also plan to livestream
8 that meeting as we did last fall. Information on how to access
9 those livestreams are on the NOSB meeting page on the USDA
10 website. Transcripts for all segments of these meetings will
11 be posted once they are complete, as Michelle mentioned.

12 This meeting, like all other meetings of the National
13 Organic Standards Board, will be run based on the Federal
14 Advisory Committee Act and the Board's Policies and Procedures
15 Manual. Kyle Smith, our Board Chair, will facilitate this
16 session. We remind everyone that it's an open, transparent
17 process, so we ask everyone to be respectful of each other and
18 avoid personal attacks. This extends also to chat messages.
19 Even if you disagree with the speaker's position, please be
20 sure to provide them the same respect and grace you would want
21 for yourself. I'll hand the mic back to Michelle, who will do
22 a roll call of Board members. Thank you.

23 MS. ARSENAULT: Thank you, Jared. All right. So as
24 a way to do roll call and test people's mics and cameras, Kyla
25 Smith.

1 CHAIR SMITH: I'm here. Good morning, everybody.

2 MS. ARSENAULT: Good morning.

3 Amy Bruch. Oh, here's Amy.

4 VICE CHAIR BRUCH: Yes, good morning. Thank you.

5 MS. ARSENAULT: Good morning, Amy.

6 Nate Lewis. Nate, you're on the phone at the moment
7 I think. Let's see. He may be transitioning from -- ah, there
8 he is. I figured we caught him in between transition from
9 phone to computer.

10 BOARD MEMBER LEWIS: I'm here.

11 MS. ARSENAULT: Welcome, Nate.

12 Brian Caldwell.

13 BOARD MEMBER ALDWELL: Good morning, everybody.

14 MS. ARSENAULT: Good morning.

15 Jerry D'Amore.

16 BOARD MEMBER D'AMORE: Hello from California.

17 MS. ARSENAULT: Welcome, Jerry.

18 Carolyn Dimitri is going to be joining a little late,
19 but she'll be on the call in a bit.

20 Kim Huseman.

21 BOARD MEMBER HUSEMAN: Good morning.

22 MS. ARSENAULT: Good morning, Kim.

23 Mindee Jeffery.

24 BOARD MEMBER JEFFERY: Yep. Good morning.

25 MS. ARSENAULT: Good morning, Mindee.

1 Allison Johnson.

2 BOARD MEMBER JOHNSON: Good morning.

3 MS. ARSENAULT: Good morning.

4 Dilip Nandwani.

5 BOARD MEMBER NANDWANI: Good morning, all.

6 MS. ARSENAULT: Good morning, Dilip.

7 Logan Petrey.

8 BOARD MEMBER PETREY: Good morning from Florida.

9 MS. ARSENAULT: Hi, Logan.

10 Nate Powell-Palm.

11 BOARD MEMBER POWELL-PALM: Good morning from Montana.

12 MS. ARSENAULT: Good morning.

13 Franklin Quarcoo.

14 BOARD MEMBER QUARCOO: Morning.

15 MS. ARSENAULT: Good morning, Franklin.

16 Wood Turner.

17 BOARD MEMBER TURNER: Good morning. And just a heads

18 up, I keep losing my audio, so just bear with me. I keep

19 joining, like rejoining and rejoining just to get it

20 reestablished, so I don't know what's going on but --

21 MS. ARSENAULT: Okay. We'll keep an eye out for you

22 and get you those phone numbers which are in the chat in case

23 you need to dial in.

24 And Javier Zamora. Javier's not with us.

25 Okay. So we also have some NOP staff on the call

1 with us, backing us up. Andrea and Jared are sharing your
2 slides today,, and so if you do have slides, give them a beat
3 to get things loaded, and sometimes there's a little delay
4 before everyone can see them in the meeting -- go bandwidth.

5 Jo Mirenda's on the call with us. Heather Kumar, who
6 is the food technologist, supports the Board, is on the call
7 with us. And a couple other NOP staff members I see on the
8 line with us. So I'm going to hand off the mic now to Kyla
9 Smith, the Chair of the National Organic Standards Board, to
10 get us started for the day. Go, Kyla.

11 CHAIR SMITH: Thanks, Michelle.

12 Well, yes, just to echo some of what Jared said,
13 welcome to those who are joining us for the first time today,
14 and welcome back to those diehards who are holding strong for
15 day two.

16 I know I really enjoy hearing everybody's
17 perspectives. I think, you know, obviously if the Board didn't
18 hear all these diverse perspectives, we'd be making these
19 decisions in a vacuum, and so it's really valuable that people
20 choose to show up today and give voice to our agenda topics.
21 And so, anyway, super grateful. And we have another very full
22 slate today, so I'm going to get us right into the day.

23 I do have a couple quick reminders. So just a
24 reminder that there is a policy in our policies and procedures
25 manual about public comments. All speakers who will be

1 recognized signed up during the registration period. Persons
2 must give their names and affiliations for the record at the
3 beginning of their public comment, and I'll remind speakers
4 throughout the day. Proxy speakers are not permitted.

5 Individuals providing public comment shall refrain
6 from making any personal attacks or remarks that might malign
7 the character of any individual. Members of the public are
8 asked to define clearly and succinctly the issues they wish to
9 present before the Board. This will give NOSB members a
10 comprehensible understanding of the speaker's concerns.

11 I will call on speakers in the order of the schedule
12 and will announce the next person or two in the queue so they
13 can prepare. Please, again, remember to state your name and
14 affiliation at the beginning, and then we'll start the timer,
15 and in a minute here I'll have Michelle test out the timer.
16 Board members will indicate to me if they have any questions
17 after the speaker is done, and I will call on them. Only NOSB
18 members are allowed to ask questions.

19 Our first speaker today will be Barry Flonnory.
20 After Barry will be John Rosenow, and then after John is Merry
21 Clark.

22 So before we have Barry join us, Michelle, can you
23 test out the timer?

24 MS. ARSENAULT: Not hearing it?

25 CHAIR SMITH: I think you have to switch -- did you

1 switch your microphone back over by the timer?

2 MS. ARSENAULT: I did.

3 CHAIR SMITH: Oh, you did?

4 MS. ARSENAULT: I did switch it.

5 CHAIR SMITH: You know, it was super quiet at the
6 beginning last time, and then during people's comments I, like,
7 jumped every time. So I think it's going to be fine.

8 MS. ARSENAULT: I just toggled between mics, and I
9 came back to it. Let's see if I kick-started it.

10 CHAIR SMITH: Oh, yes. Much louder. Yeah.

11 MS. ARSENAULT: All right.

12 CHAIR SMITH: Okay. So Barry, you can join us, and
13 don't forget to state your name and affiliation, and then you
14 can get started.

15 MS. HOLM: Barry was just here, and he's just
16 disappeared.

17 CHAIR SMITH: Okay. Thanks, Andrea.

18 Well, is John Rosenow with us?

19 MS. ARSENAULT: I don't see John, maybe unless he was
20 on -- we have a bunch of phone numbers with us, but I didn't
21 see his phone number.

22 CHAIR SMITH: Merry Clark. Is Mary with us? Okay.
23 let's go to Merry, and then maybe we can circle back around.

24 So Merry, remember to state your name and
25 affiliation, and then you can get started.

1 MS. CLARK: Okay. Hi, everybody. Can you hear me?
2 Okay. All right. I'm Merry Clark, and my parents -- this is
3 kind of a story. I'm going to tell you a short story. John
4 and Merrill Clark started Roseland Organic Farms back in 1980,
5 and we had about 1500 acres, and it was actually the largest
6 organic farm in the state at that time. And, you know, there
7 were droughts and high interest rates, we pressed forward, and
8 by the 90s things were moving along, right?

9 And then my mom -- this is kind of part of the reason
10 I'm here -- she was on the NOSB in 1992, so she was actually
11 the chair of the first livestock committee that existed. And
12 as far as I understand, you're actually still kind of debating
13 the same kind of issues that you were 30 years ago, and I guess
14 I'm trying to understand, you know, what's going on with those,
15 mainly the access to pasture. I think that's a big issue
16 that's still being discussed.

17 And after the problems that happened after my dad
18 passed is that my brother took over the operation and, you
19 know, while it was certified organic all those years, then he
20 decided, okay, it's just going to be grass-fed, and the land
21 itself is going to be certified organic because he decided a
22 lot of problems with, you know, the expense, the time, the
23 bureaucracy, the paperwork, and then, of course, there is a
24 decided lack of certified organic processors in this area of
25 southwestern Michigan kind of, so he was like having to drive

1 farther and farther and farther to find that.

2 So also, when Whole Foods came into the area, that
3 also changed the ballgame quite a bit, too. So and also,
4 you've probably heard this before. I may be reiterating a
5 little bit, but the certified organic grass-fed beef is
6 competing, of course, with organic beef that's raised sort of
7 in a CAFO. So that's kind of -- I know probably the Real
8 Organic Project people are talking about that, those issues,
9 because that's kind of not a real level playing field, and I
10 think Dave Chapman's going to be on here. I don't know if he's
11 going to talk about the same things, but probably.

12 So anyway, back to my mom. She's 86 now. She has
13 Alzheimer's. She's in a nursing home. And the reason I know
14 about this, she left a lot of notes about her experience on the
15 NOSB, and so I'm turning all of that -- all of what she wrote
16 -- into a book, and that's going to be coming out next May, but
17 it's pretty much all her writing.

18 And I also wanted to know more about the Farm Systems
19 Reform Act which I know is out there, and it's kind of in the
20 Senate somewhere, and I just wanted to know more about what's
21 happening with that, and I think my time is almost up. How did
22 I -- did I --

23 CHAIR SMITH: Yes, you did great. Thanks so much.
24 Well, I'm fascinated to read this book when it comes out, I
25 must say. With my time on the Board, I have been thinking like

1 someone's got to, like, write a book. So anyway, I'll be
2 looking forward to it. I see you have a couple questions,
3 Merry, so if you want to just hang tight.

4 Jerry, please go ahead.

5 BOARD MEMBER D'AMORE: Thank you. Good morning.

6 Good morning, Merry. You said that Whole Foods came
7 in and changed things. How did it change your life?

8 MS. CLARK: Well, my brothers were doing -- well, you
9 can't sell as much beef because there's all these -- this other
10 source which, of course, is not very -- it's not local, a lot
11 of it is just not local, and so it definitely imposed on the
12 sales. All the beefs that we were selling, people just said,
13 oh, it's going over to South Bend, you know, Indiana. That's
14 where it came in, and it just, yeah, it just -- the sales went
15 down. So that was part of the problems so --

16 BOARD MEMBER D'AMORE: Thank you.

17 CHAIR SMITH: Allison, please go ahead.

18 BOARD MEMBER JOHNSON: There we go.

19 Thank you so much for being here, Merry. It's
20 amazing to see the family legacies in organic are continuing,
21 and I'm really glad that you're here and still engaged.

22 I just wanted to flag for you and others listening,
23 we as a board can provide recommendations to the U.S.
24 Department of Agriculture about -- so what we can do under the
25 existing laws. Something like the Farm System Reform Act is

1 new action proposed by Congress. So we're so glad to have you
2 here talking with us, and we're going to do everything we can
3 within our purview to address the issues that you've raised and
4 others have raised.

5 But it's also really important for everyone to be
6 talking to your members of Congress, writing to legislators.
7 This is appropriation season, so the budget for the U.S.
8 Government is under discussion, the Farm Bill is under
9 discussion. So definitely keep showing up here and also keep
10 showing up in your members of Congress' offices and by email
11 and phone calls.

12 You mentioned processing, and I'm curious to hear if
13 you see it opening up. There have been a lot of funding
14 opportunities coming through for processing generally in the
15 meat sector and organic hopefully, and I'm curious if you have
16 a sense of what it would take for your brother to re-up his
17 certification for the herd and actually get those meat products
18 to market as organic.

19 MS. CLARK: That's a whole other part of the story
20 that I didn't quite get to, but, you know, my brothers are
21 getting older, and I know it sounds like, well, how come you're
22 not doing anything? You're the sister. But that's a whole
23 other issue. But the answer is probably not because they
24 aren't doing it to the level -- because, like I said, they're
25 getting older and the next generation is like, oh, I don't know

1 what I want to do.

2 And then there's actually a solar company coming into
3 the area and leasing some of our land, and so now a lot of it
4 is going to become a solar farm, and I don't have a problem
5 with that.

6 So the herd is very -- so they're not doing a whole
7 lot of -- so I actually don't know about this -- the processors
8 and all of that. I wouldn't know that because we've kind of --
9 the business is much smaller than -- I'd have to ask my
10 brother, and I don't think he's looked around a whole lot. I
11 don't know where he's going really right now, but probably not
12 to a certified organic processor because I know that's a whole
13 other -- I think it's going to Byron Center someplace. So but
14 I don't think that's a certified organic processor. Now that
15 was part of the problem is that, you know, that's -- there's
16 all those things that have to be done, and it's hard to --

17 BOARD MEMBER JOHNSON: Yeah, it's really complicated.
18 Thank you. Definitely understand that there are a lot of
19 considerations that go into this. So thanks for being here and
20 sharing your story.

21 MS. CLARK: Thanks.

22 CHAIR SMITH: Nate, please go ahead.

23 BOARD MEMBER POWELL-PALM: Merry, this has been the
24 best start to any NOSB Thursday I have ever had. What a great
25 story. Thank you for joining us today.

1 A question I would have is -- I'm a beef guy,, I
2 really appreciate you bringing the beef question to bear -- and
3 I was wondering if you could speak to any evidence for CAFO
4 beef being the problem versus imported beef being the problem.
5 And by problem I just mean, you know, hard on American markets.

6 MS. CLARK: I'd say they're both.

7 BOARD MEMBER POWELL-PALM: Okay. Could you speak a
8 little bit more to -- I just can't find any CAFO beef. Like I
9 can't find any certified organic feedlots in the organic
10 integrity database. It all seems to be imported. So I was
11 wondering if you could point us to some of those companies or,
12 you know, areas that you're seeing it come from.

13 MS. CLARK: I would not know that. I would not know.
14 I think it's all -- doesn't it all go to Burger King or
15 something like that. I would not know.

16 BOARD MEMBER POWELL-PALM: Oh, for organic, yeah, for
17 organic CAFO beef.

18 MS. CLARK: Oh, of course, that's not Burger King.
19 Organic CAFO beef. Yeah, I don't know. I don't know. I just
20 know that they're -- that you can call it certified organic
21 even if it was raised in that manner because --

22 BOARD MEMBER POWELL-PALM: Totally, yeah.

23 MS. CLARK: I think that it maybe should not be.

24 BOARD MEMBER POWELL-PALM: Do you think that would
25 help our market, though, if none of it exists right now?

1 MS. CLARK: If none of --

2 BOARD MEMBER POWELL-PALM: If no CAFO beef is making
3 it to market right now, do you think changing --

4 MS. CLARK: Meat organic? I mean, organic?

5 BOARD MEMBER POWELL-PALM: Yeah. Yeah.

6 MS. CLARK: Well, yeah, I think that's a whole thing
7 is here's got to be a lot of outreach because I don't think the
8 consumer, from a consumer standpoint, no one -- they don't know
9 because it's not, you know, the -- I don't know. That's a good
10 point because I don't know if the consumer really understands.

11 BOARD MEMBER POWELL-PALM: I would love to follow up.
12 Yeah. Appreciate you being here today. They are important
13 issues.

14 MS. CLARK: Okay.

15 BOARD MEMBER POWELL-PALM: Thank you.

16 MS. CLARK: You know, Dave's probably going to talk
17 about this. I don't know. Probably. But Dave Chapman.

18 CHAIR SMITH: Oh, one more.

19 Mindee, please go ahead.

20 BOARD MEMBER JEFFERY: Well, Merry, I just wanted to
21 thank you for coming in, and thank you and your family for all
22 of your service to the food system.

23 MS. CLARK: Thanks.

24 CHAIR SMITH: Thanks so much, Merry. Appreciate it.
25 And like, yeah, when the book comes out, get it circulate it

1 out like --

2 MS. CLARK: Well, is it okay if I put it in the chat?

3 But I didn't know if it was okay to let --

4 BOARD MEMBER POWELL-PALM: Oh, yeah, go ahead.

5 MS. CLARK: I can put the title?

6 CHAIR SMITH: Yeah. Put it in the chat and put the
7 title.

8 MS. CLARK: Can I just tell you right now?

9 CHAIR SMITH: Sure.

10 MS. CLARK: It's called Dandelion Roots Run Deep.
11 And I don't know if it's that, but --

12 CHAIR SMITH: Okay. Yeah, put it in the chat.

13 MS. CLARK: I didn't know that was like kosher or
14 whatever. But so it's both of us. So it's -- there's my mom,
15 so I put her name first because it's really mostly -- it's
16 hers. I mean, she worked her whole life on it, and I said,
17 well, I've got to do this. I have to. I just have to do it.

18 CHAIR SMITH: Thanks for being with us today.
19 Appreciate your comments.

20 I believe we have Barry back on the line. Barry, are
21 you here?

22 MR. FLONNORY: Yes, I'm present.

23 CHAIR SMITH: Wonderful. Okay. Don't forget to
24 state your name and affiliation, and then you can get started
25 with your comments.

1 MR. FLONNORY: Barry Flonnory, BF Farm Enterprises.
2 We're in Bartow, Georgia. We farm about a -- we own 163 acres,
3 and we farm about 1,000 acres. I'm in the midst of transition,
4 and my three comments are of the NCRS Organic Transition
5 Program. It's they have a poor or hard time administering the
6 program. They don't know a lot of the policies and procedures.
7 And in conjunction with that, the Conservation Steward Program,
8 they don't know how to tie it together. And then the
9 Environmental Quality Incentive Program also, they don't know
10 how to manage the three of them.

11 Then the second one is the transition cost during the
12 period of transition. You're following organic practices, but
13 at the end of the year you have to buy land and equipment doing
14 the transition. There's a lot of cost involved, and if they
15 can help with that also. And then during that three-year
16 period, you're doing organic practices but you're selling
17 conventional prices. So if there's a way to help during that
18 period, it would be greatly appreciated. And those are my
19 three comments.

20 CHAIR SMITH: Thanks so much.

21 MR. FLONNORY: Thank you.

22 CHAIR SMITH: Yeah, thanks so much, Barry. If you
23 want to just hang tight for a couple minutes, we have some
24 questions for you from some board members.

25 Nate, please go ahead.

1 BOARD MEMBER POWELL-PALM: Thank you so much for your
2 comments, Barry, and for joining us today. Could you speak a
3 little bit more to the programs you've applied for? Have you
4 tried to get some 823 funding? Or what all have you tried to
5 apply for with NRCS? We have heard from other farmers that
6 this is -- seems like an opportunity that's being missed, so
7 we'd love to hear just a few more details about that.

8 MR. FLONNORY: Yes, I applied for all three, the
9 Organic Transition Program, which they can hardly answer one
10 question, they could tell you the topic, and that's probably
11 it. She emailed, I think, the state representative, and they
12 didn't know either, so a lot of questions that were unanswered.

13 I've been a part of the Conservation Steward Program,
14 CPS, but they don't know how to tie it to the organic
15 transition. Same as the EQIP program. I have been receiving
16 funds, but they don't know how to tie the Organic Transition
17 Program to it. So it's a major concern because every cent
18 helps when you're transitioning, and even after you transition.

19 BOARD MEMBER POWELL-PALM: Absolutely. Yeah, I know.
20 I really appreciate that. You're in, I think, the Southeast
21 TOPP region. And so, yeah, I would love to follow up with you
22 to see how we can help you out, especially if you're TOPP. But
23 thank you for taking the time to talk to us and raise these
24 issues.

25 MR. FLONNORY: Thank you.

1 CHAIR SMITH: Allison, please go ahead.

2 BOARD MEMBER JOHNSON: Hi, Larry. Thanks so much for
3 being here and for sharing that feedback. Even though it's
4 frustrating, I think the more that we start to air what is
5 working and not working the more we can offer recommendations
6 to USDA about how to improve how the different pieces of the
7 program work together. So I'm sorry you've gone through this,
8 and I hope we'll be able to help you improve it.

9 I'm curious to hear how the transition process has
10 gone for you aside from these programs not working, what
11 changes you're seeing on the farm, what opportunities are
12 opening up, and kind of what is causing you to stick with it
13 even though the support programs haven't been there in the way
14 that they should be yet.

15 MR. FLONNORY: It's -- I would say it's tough at
16 best,, but when you want to do something, and you have a will
17 to do it, you figure out a way to get it done. So it is very,
18 very -- I can say it's very, very tough. But I want a
19 transition. I want the working environment to be safe for the
20 employees and my family. I want to raise quality feed and
21 food. So that's why I'm sticking with it.

22 BOARD MEMBER JOHNSON: Thank you for your commitment.
23 That's amazing. And hopefully we'll be able to smooth the path
24 out for you in the years moving forward.

25 MR. FLONNORY: Thank you.

1 CHAIR SMITH: Amy, please go ahead.

2 VICE CHAIR BRUCH: Allison kind of tackled my
3 question. But, Barry, thank you so much for joining us, and
4 definitely we want to make sure we can follow up and get you
5 the technical resources you need to be successful. This is a
6 great way to farm, and we want to make sure that you can, yeah,
7 have success. So thanks.

8 MR. FLONNORY: All right. Thank you.

9 CHAIR SMITH: Logan, please go ahead.

10 BOARD MEMBER PETREY: Hey, Barry. I'm Logan. I'm
11 actually in the Florida-Georgia area, so close to you. Yeah,
12 thanks for coming on. And I was just curious, what are you --
13 what kind of farming system do you have? Are you vegetable or
14 row crop?

15 MR. FLONNORY: It's row crop.

16 BOARD MEMBER PETREY: Pardon?

17 MR. FLONNORY: It's row crop.

18 BOARD MEMBER PETREY: Okay.

19 MR. FLONNORY: And right now I'm doing a lot of milo
20 and soybeans. Once I get certified, we'll probably expand
21 more.

22 BOARD MEMBER PETREY: Okay. Great. Thank you.

23 MR. FLONNORY: Thank you.

24 CHAIR SMITH: One more from Nate.

25 BOARD MEMBER POWELL-PALM: Tiny, tiny question.

1 Barry, are you enrolled in the TOPP program as a transitioning
2 mentee?

3 MR. FLONNORY: Yes, I am. I have --

4 BOARD MEMBER POWELL-PALM: Okay. Good enough.

5 MR. FLONNORY: Yes, I have three representatives
6 that's helping me right now.

7 BOARD MEMBER POWELL-PALM: Awesome. All right.

8 MR. FLONNORY: Thank you.

9 CHAIR SMITH: Thanks, Nate. I was going to ask.
10 Okay. Barry, thanks so much for joining us, and
11 really appreciate you taking the time -- or spending some time
12 with us this morning. Your comments were valuable.

13 MR. FLONNORY: Well, thank you,, and any time.

14 CHAIR SMITH: Great. Okay. Do we have John Rosenau
15 on the line?

16 MS. ARSENAULT: I'm still not seeing John, Kyla. We
17 have a bunch of unidentified phone numbers on the call with us,
18 and speakers who signed up and didn't include their phone
19 number, so I can't match them.

20 CHAIR SMITH: Okay. John, if you're there, if you
21 could just chat in that you're there. We're going to move
22 along, but we want to circle back to you if you are here.

23 Okay. Sorry for not giving advance warning here to
24 Joe Freeze, but, Joe, you'll be up next. Then we have Aaron
25 Zimmerman and then Kestrel Burcham.

1 So Joe, are you there?

2 MS. ARSENAULT: I'm also not seeing Joe in the Zoom
3 participant list, and I see only on the phone.

4 CHAIR SMITH: Okay.

5 MS. ARSENAULT: And Aaron canceled this morning,
6 so --

7 CHAIR SMITH: Oh, okay. Sorry.

8 MS. ARSENAULT: That's okay.

9 CHAIR SMITH: Yeah, make it onto my sheet. Okay.
10 Kestrel Burcham, are you there?

11 MS. BURCHAM: Yes, I'm here.

12 CHAIR SMITH: Oh, great.

13 MS. BURCHAM: Can you hear me okay?

14 CHAIR SMITH: I can hear you. It was breaking up a
15 little bit, so we'll see how it goes as you start. But before
16 you start, let me just announce a couple --

17 MS. BURCHAM: All right.

18 CHAIR SMITH: -- hold on one second. Let me just
19 announce a couple down the line.

20 MS. BURCHAM: Sure.

21 CHAIR SMITH: After Kestrel, we have Dan Giacomini
22 and then Matt Begley.

23 Don't forget to state your name and affiliation,
24 Kestrel, and then you can get started.

25 MS. BURCHAM: Thanks. Good morning, members of the

1 NOSB and NOP Institute. I am the Policy Director for The
2 Cornucopia Institute.

3 I'm going to be blunt. We are flooded with bad news.
4 Extreme weather patterns have continued into 2024 with
5 scientists worried that we have already breached the crucial
6 1.5 Celsius warming threshold outlined in the Paris Climate
7 Agreement. Consumer health continues to decline overall, due
8 in part to poor regulation of toxins in our environment. Our
9 food system is fragile, and grades food, and nutrition
10 insecurity among the most vulnerable. I think many of us in
11 this room would agree that organic food and farming can serve
12 as a balm to many of these problems.

13 I want policymakers and advocates to dream big and
14 truly invest in establishing organic production as an
15 alternative to harmful conventional practices rather than a
16 niche product only available to the privileged and ideologues.
17 Organic should be the floor as we move toward a food system
18 that embraces agroecological principles of diversity, co-
19 creation, resilience, human and social values, and circular and
20 solidarity economies.

21 To achieve that vision, organic as we know it needs
22 to have high integrity, transparency, and prioritize
23 environmental and human health. These goals require a
24 consistent application of organic regulations. Some problems
25 of consistency are being worked on by the Board and NOP right

1 now, which we are thankful for, but there are always a few
2 issues to address.

3 Specific concerns include: 1) The evergreen problem
4 of inert ingredients. Allowing synthetic inert ingredients to
5 still be used without being reviewed and listed on the National
6 List flies against fundamental organic principles - especially
7 when we know many of the inert substances are dangerous to
8 human health and environment. We believe that all these
9 ingredients must be listed and the NOP should allocate
10 resources as needed.

11 2) Soil is the foundation of organic agriculture.
12 Allowing hydroponic under the organic label is inconsistent
13 with key requirements in the regulations. The lack of
14 consistency in this area is harmful for the organic marketplace
15 as a whole and undermines any promise of a food system aligned
16 with agroecological principles. We ask for the Board to call a
17 moratorium on certification of new hydroponic operations until
18 this issue can be resolved.

19 The experiment that is the conventional food system
20 is an absolute failure, especially from the human and
21 environmental health standpoint. The lack of transparency and
22 disregard of the precautionary principle are fundamental to
23 that failure. Organic consumers trust the label. Many in the
24 disabled community, including myself, rely on organic food to
25 maintain functionality in some form. Research continues to

1 back up the environmental health benefits of organic food
2 despite pressure from anti-organic propaganda.

3 It will take hard work to protect food and farming
4 practices we support, but that work is needed to keep moving
5 the needle to a more sustainable and safe future for everyone.
6 In this way, I hope that the organic market organic marketplace
7 can be defined by the phrase: "Once you know better, do
8 better." Thank you for your time and hard work protecting
9 organic integrity.

10 CHAIR SMITH: Thanks, Kestrel.

11 Do we have any questions for Kestrel? I'm not seeing
12 any.

13 Thanks so much for your comments today.

14 I think we have Joe Freeze on the line, but we're
15 going to go to Dan and then Matt, and then we'll get Joe after
16 those two.

17 So, Dan Giacomini, are you there? Wonderful. State
18 your name and affiliation, and then you can get going.

19 MR. GIACOMINI: Thank you. I am Daniel Giacomini.
20 I've been consulting in organics since the 1990s. I'm a former
21 member of the NOSB, serving as board chairman in 2010. I
22 support the relisting of all sunset items under consideration.
23 Specifically, I support the current listing of iodine on 603.
24 There's a concern with NPEs and iodine teat dips, but I'm not
25 aware of any such product still on the market.

1 I support relisting both fenbendazole and moxidectin.
2 However, the NOP needs to review how certifiers are satisfying
3 238(d)(1), quote, organic livestock operation must have a
4 comprehensive plan to minimize parasite problems, end quote,
5 for recurring non-routine needs.

6 Following the current TR template review, I urge the
7 NOP and the NOSB to review the petition template process. As a
8 major contributor to the recently-submitted producer-supported
9 petition on meloxicam, the current process is biased in favor
10 of the manufacturer, and this is a mistake. Adding of
11 substances to the National List should be biased to the
12 producers and operations needing the substance. The bias
13 should not be toward the manufacturer wanting to sell the
14 product.

15 The growing of aquatic plants is part of our
16 industry, and I do not see where the value of CO2 in those
17 systems received comment or was considered in the current
18 review. If you reject the petition, please note that the
19 aquatic plant sector's input was limited, and that a future
20 petition to list CO2 from that sector should not be refused as
21 an already-denied substance.

22 As others have stated, while the industry is booming,
23 our individual farmers are struggling. Every action the NOP
24 takes requiring more time and paperwork up and down the supply
25 chain can increase production costs without improving farm

1 prices.

2 SOE was significant and welcome, but it will raise
3 operation costs in time and money while offering very little
4 opportunity to increase prices received by organic producers.
5 Please consider this in your future rulemaking before our
6 booming retail industry has no small U.S. farmers supplying it.

7 A petition requesting meloxicam to be added to 603 as
8 an oral pain relief medication is in the hands of the Livestock
9 Subcommittee. Research in pain mitigation in animal care is
10 far beyond where it was at the time of OFPA or even when the
11 pain relief substances were finally added to the National List.
12 Meloxicam is a substance that needs to be added now.

13 Meloxicam as petitioned would be an oral treatment
14 which is less stressful than any other injection, and it is
15 more effective at pain relief than the allowed oral options.
16 Meloxicam relieves pain for a longer duration, requiring fewer
17 treatments over a 24-hour period. Meloxicam provides improved
18 pain relief with less stress. Please add meloxicam to the
19 National List.

20 CHAIR SMITH: Dan, you have a couple questions.

21 Nate, please go ahead.

22 BOARD MEMBER POWELL-PALM: Dan, thank you for your
23 service to the Board and your expertise today.

24 Could you speak a little bit to how certifiers can
25 manage and review the use of parasiticides better? Is there a

1 reasonable route to requiring more manure tests to try to see
2 actual quantitative test loads? Or what do you see as being
3 the next step to improving that utilization?

4 MR. GIACOMINI: I'm not aware of that level of
5 technology. I'm not aware of what's really available there and
6 the potential false negatives or positives that would be
7 involved.

8 I would say that I think it's more on the front end
9 side of helping farmers prevent it. I'm not sure there's a lot
10 we can do in the case of an outbreak where a group of animals
11 need to be treated. But I think once that occurs, rather than
12 just allowing it to become a routine, non-routine use that the
13 certifiers work with the farmers to get into their organic
14 system plan how they're going to minimize the need in the
15 future.

16 BOARD MEMBER POWELL-PALM: Okay. Thank you.

17 CHAIR SMITH: Brian, you can go ahead.

18 BOARD MEMBER CALDWELL: Yeah, Dan, thanks so much for
19 your comments. Really appreciate them.

20 I want to follow up a little bit more on
21 parasiticides. We've sort of enlisted a literature review of
22 all the different types of approaches to parasite management in
23 livestock. It's a pretty big project. And if you can forward
24 any specific materials you have, particularly about like
25 holistic, maybe non-pesticide type of management for parasites

1 in livestock -- if you could forward that to Michelle, we'd
2 really appreciate that, and then we can try to circulate that
3 around and digest it within the Board.

4 So that's really important stuff, and as one of our
5 previous callers said, you know, we've been talking about this
6 issue for like 30 years, and so it's time to really kind of
7 nail it down a little bit. So thanks so much.

8 MR. GIACOMINI: Yeah, let me just say that, you know,
9 on that, the reason this comes up for me is because I was hired
10 as a consultant with Merck when they were at one point in time
11 trying to get the awareness of Fenbendazole into the market,
12 and I really emphasized to them the need to encourage farmers
13 to develop that plan if they had a situation where they needed
14 it multiple times, that it became that routine, non-routine.
15 And it just became aware to me that there didn't seem to be a
16 lot of interaction between the producers and the certifiers
17 that there even really needed to be a plan and what that plan
18 would look like.

19 It would be interesting to see what the NOP -- if
20 they surveyed certifiers -- to see what any of them are looking
21 at as a plan now. And also in working with Merck, I told them,
22 you know, you guys supporting this from the plan position is
23 going to improve your opportunity to stay in the market and
24 stay on the National List as helping to be part of the solution
25 and not just an out that you're trying to exploit a problem.

1 BOARD MEMBER CALDWELL: Great, Dan. And any
2 information you might have on the elements of that plan, that's
3 really what we're trying to nail down here, because we need
4 that information as a basis. So really appreciate it.

5 MR. GIACOMINI: Yep.

6 CHAIR SMITH: Nate, please go ahead.

7 BOARD MEMBER LEWIS: Oh, there we go. Now I've been
8 given the power to unmute myself.

9 Thanks, Dan. I had a question from your experience
10 on the Board around the conversation -- when you were on the
11 Board -- around methionine and the Board's decision to apply a
12 restriction to that substance in contrast to, say, vitamins and
13 minerals which are allowed without restriction. And I'm
14 curious if you could just kind of share just a short summary of
15 just what that conversation was like at the Board. Why add a
16 restriction to that essential amino acid?

17 MR. GIACOMINI: Well, I don't think at that point in
18 time it would have ever passed without a restriction.
19 Synthetic amino acids was not something that was going to be
20 allowed. It took a great amount of education and fighting a
21 number of battles to even get it where it was.

22 We encouraged the industry that a fence was going to
23 have to be put up, and over various times they came with that
24 to us with a number of different ways. Is it methionine? Is
25 it just added methionine? Is it to the total amount of

1 methionine in the diet? Is it cysteine methionine? Created
2 some problems in that they kept trying to change the best
3 target that they thought.

4 In the end, we wanted to get it on the list. We
5 wanted to get it on the list with a fence around it. And at
6 the time we were -- and I think we reviewed methionine three
7 times while I was on the Board in the five-year period. So it
8 was in constant discussion. But it was, you know, what we put
9 up then was one of the options that was presented to us. It
10 seemed the most reasonable at the time, but we were very aware
11 of the fact that it might not be the right one. I know a
12 number of years ago they had some -- I believe it was some
13 knuckle issues in chickens due to the ammonia levels due to
14 having to raise the natural sources of protein to get up to
15 certain levels, and I think those are animal welfare issues
16 that need to be discussed.

17 I don't think there were too many people on the
18 Board, especially on the Livestock Committee, that would say
19 now -- would say that that fence that we'd put up was only to
20 be reduced. If that fence was shown to us with evidence of
21 brood experience in the houses that it needed to be raised a
22 little bit, then I think that was where we intended. But we
23 wanted to get it on the list and get it -- you know, because at
24 that point in time, the poultry part of the industry was still
25 a developing part, and we wanted to encourage that.

1 But if we're not going to allow any animal slaughter
2 products, and that is part of the rule that we're going to hold
3 sacred, then there was no other way to balance the ration. I
4 mean, my basic is an animal nutritionist. I'm more dairy than
5 poultry, but when you look at the numbers, there's no way in a
6 natural ration with no slaughter products and no animal
7 products, and we're not going to even account for the worms
8 that a normal bird -- I won't say that -- but birds can get,
9 you know, an area of ground can only hold so many birds to so
10 many earthworms, and it's just if we're not going to allow the
11 slaughter products, and they need a different level of
12 methionine, we had to do something, or we felt we had to do
13 something.

14 It certainly had its objectors, but that was the
15 parameter. We worked with the industry and their task force
16 extensively to try and figure out what those were, but we were
17 very comfortable that this might be the wrong number, and it
18 may be pushed in, we may be able to pull it in, we may need to
19 push it out. But let's see what it would take.

20 For a reasonable amount for the industry, getting
21 away from them looking at birds as purely a financial number
22 and having to maintain conventional conversion rates and all
23 those things, this was a number that we felt was reasonable,
24 and that's what we're trying to look for.

25 It may have been wrong, and when you look at some of

1 the animal welfare comments regarding, you know, maybe it does,
2 maybe it is. But there's a lot of different interests that
3 have to be considered to come up with a reasonable, pragmatic
4 compromise, and that may evolve over time, but that's where we
5 sat, what we did, you know, back in those days.

6 BOARD MEMBER LEWIS: Great. Thank you so much.
7 That's super helpful. I appreciate it.

8 MR. GIACOMINI: Thank you.

9 CHAIR SMITH: We've got one more from Nate, and then
10 I'm still deciding. I might follow up. We'll see.

11 Go ahead, Nate.

12 BOARD MEMBER POWELL-PALM: Thanks for letting us
13 throw so many questions at you, Dan.

14 You said something that really sparked kind of a
15 passion point of mine, which is animal welfare in organic, and
16 I think when we talk about things like parasiticides,
17 fenbendazole, moxidectin, you know, meloxicam, these pain
18 mitigation strategies, we're talking about animal welfare.
19 We're talking about we're asking these animals to be in service
20 of our human needs, and how can we make it easier on them.

21 And I was wondering why or how you think we can start
22 talking more about organic being an animal welfare standard,
23 that we have the tools to make an excellent life for these
24 food-producing animals. How can we start engaging that more
25 authentically and bring that to be a bigger piece of awareness

1 for the organic seal?

2 MR. GIACOMINI: That's a tough question from the
3 standpoint that it is hard to hold on to great organic ideas
4 for ourselves. I've been to conferences where sub-therapeutic
5 levels of antibiotics was when it was a routine part of all of
6 conventional agriculture across all sectors. And it was really
7 apparent in the discussions -- and I think I even asked the
8 question and the commenters admitted -- it was a crutch to
9 maintain the level of production they wanted in the
10 environmental state they put the animals in.

11 But since then, we don't have nearly that level of
12 sub-therapeutic antibiotic use or, you know, different things.
13 So we're getting to it in a lot of different ways. We're
14 getting it into it in lower animal density. We're getting it
15 into in cleaner environments. We're getting it into a lot of
16 different ways.

17 The problem is every time we have a great idea, it's
18 going to get used everywhere, and a number of the things that
19 organics took back from the 50s in livestock farming that were
20 totally lost are now routine again as if they were always
21 there. So I think it's a matter of trying to decide what we
22 can do best, but we do need some things.

23 You know, I remember when I was on the Board, Hugh
24 Caraman (phonetic) was always of a particular substance on the
25 crop list that would help keep snails and then liver flukes out

1 of pastures from wetlands. So it's doing all those different
2 kind of things.

3 How we then explain that to the consumer and then own
4 animal welfare, I don't really know. I know that all the
5 animal welfare organizations that have picked up since, even
6 though organic has always tried to kind of own that as a
7 standard between conventional, an additional animal welfare
8 sticker has sort of become the standard.

9 I mean, I know one dairy farmer, he sells to a
10 broker, and he has to have, I think, four different animal
11 welfare reviews because that's all the agencies that the
12 different end users -- the different end processors -- want to
13 be able to say they have. So how to keep it back all in
14 organic and show that we're the groundwork of it? Every time
15 we have a great idea, it's going to get taken up and used in
16 the market.

17 BOARD MEMBER POWELL-PALM: Well, we'd love for you to
18 noodle on the idea of how can we take that all back for
19 organic. Organic is the animal welfare label. So we'd love to
20 follow up in future conversations with you on that. So thank
21 you so much for your comments.

22 MR. GIACOMINI: The one difference though is that
23 animal organic is more of an end product. It's a production
24 system, but it's that marketing standard. It does not, and I
25 don't think it should -- I agree with you -- but I don't think

1 it should become the details of production that some of these
2 certificates try to tell producers how to get something done --
3 not what it needs to get done, but they're trying to tell them
4 how to get something done, and that was a battle.

5 I don't know what the discussion on that has been in
6 the last 10 years, but we tried, and certainly the program at
7 that time tried to maintain, you know, we're looking at the end
8 result. We want the cattle clean. We're not going to tell you
9 what you have to do to keep them clean.

10 BOARD MEMBER POWELL-PALM: I really appreciate that.
11 Yeah.

12 I'll hand it off to Kim.

13 CHAIR SMITH: Just a reminder, guys, we're going to
14 like -- this is great, but like not that many commenters in
15 here, guys.

16 BOARD MEMBER HUSEMAN: Again, we're hitting all the
17 highlighted topics, the research priorities of the Livestock
18 Subcommittee, and the Livestock Subcommittee is very near and
19 dear to my heart. While we're on that concept, can we follow
20 up with you regarding some of the nutritional packages, both in
21 the dairy and in the poultry segment, and discuss regionally
22 adaptable feed formulations, and how we can use rotational
23 crops to better provide optionality in some of these organic
24 diets to create some stability in the marketplace? Do you feel
25 like there's, like I said, that's a research priority of ours

1 -- do you feel like there's runway for improvement in the feed
2 formulation side with organic products?

3 MR. GIACOMINI: Well, I think there's always an area
4 for improvement, and we always want to look for it where we
5 can. It's very difficult to, number one, assess mineral status
6 of a feed, of an individual crop, so if you're looking at the
7 fact that we're looking at multi-crops with different
8 subspecies in it, it's making it harder.

9 Different areas and different soils and different
10 temperatures and even different times of year have different
11 tie-ups with non-nutritional items that can come up. So even
12 measuring the levels of a mineral in them is difficult.
13 Leveling the bioavailability of the minerals in those
14 substances is even more difficult. So it's not that it's a
15 moving target. It's just that it's extremely difficult.

16 I surveyed a number of nutritionists. A producer
17 asked me, well, what would be the ideal plan? And I sort of
18 told him, I'd survey everybody I know. They came back, go to
19 NRC at 10 percent. And I said, okay, well, how do we assess
20 that? And they said, sample all the feeds and take that
21 number. Others would say, sample all the feeds and cut that
22 number in half. Others would say, you can sample all the feeds
23 and see whether anything's really screwed up, but really the
24 bioavailability on a lot of those is going to be so low that
25 you need a supplement for it anyway.

1 So assessing all those variables into what the animal
2 actually needs to be properly absorbed in the body is going to
3 make that extremely difficult. And the problem on the research
4 level is for the most part that is not -- for lack of a better
5 word -- that's not a patentable item. Most of the research
6 that's done is driven through grants from companies. There's
7 very little unattached "do the best thinking you can" grant
8 money that used to come from the federal government, for
9 instance, when I was in grad school. That money is not there.
10 So in order to get the money to do this kind of work, I don't
11 know where you'd be looking to get a good continual supply of
12 it to conduct a research program.

13 BOARD MEMBER HUSEMAN: Thank you for your comments.
14 I really appreciate that.

15 CHAIR SMITH: Okay. I do have one question, and that
16 is that from my experience and understanding in certification
17 and talking with some other certifiers, the parasite prevention
18 plan and the practices around preventative measures are all
19 included in the organic system plan. And routine use is their
20 pride, and it is obviously prohibited and, if so,
21 noncompliances are issued.

22 And so I guess I'm just wondering, from your
23 experience, are you seeing that that's not happening? Like are
24 there issues there? So I guess I'm just trying to like --
25 there is an ACA best practices on this. I do believe that

1 certifiers are -- anyway, so can you help me understand that?
2 Are you seeing something out in the world that is like not --
3 that there's a problem that we need to solve?

4 MR. GIACOMINI: I think there are some operations
5 that are routinely -- that are trying to do the best they can.
6 Others are just doing something as they feel they need it. I
7 think, if anything, the use of parasiticides, good or bad, is
8 probably underutilized to the benefit of the animal because
9 producers are wanting to maintain the option and the
10 opportunity for organic slaughter as well.

11 I'm not going to say that the animals are being
12 abused because of that, and anything is being missed, but I
13 think that if we had a better understanding of what it would
14 take and how to help the animals along, maybe we can encourage
15 a more proper use of these.

16 Not to say that we're going to have them used
17 everywhere and not to say that we're opening it up on the beef
18 side. But I think an overall understanding, you know, quite
19 frankly, the end user producers of these products are not the
20 most savvy individuals to the organic regulations. It's the
21 interaction with their certifier of what's allowed, how the
22 rule has changed.

23 I really wonder sometimes how aware each individual
24 producer really was of the fact when ivermectin came off the
25 list. If they had been needing something and that was the only

1 thing on the list, then it became one of a couple of things on
2 the list, then it was no longer on the list, you know, to a lot
3 of them, oh, man, this is just a moving target. This is all
4 fouled up.

5 And, you know, so I think it's just a matter of
6 maintaining a level of communication, including this as a
7 topic. I've seen some of the certifiers, you know, I mean,
8 they can either work with the producer to explain what the plan
9 is going to do. Okay. How are you going to do it for resting
10 pastures? How are you going to do it for the different aspects
11 to a check box? Do you have a plan? Yes. Okay. Good.
12 You've got a plan.

13 So, you know, and that may be a little bit of an
14 exaggeration. I don't want to throw any certifiers under the
15 bus either. But I don't think that the value -- what we're
16 trying to do -- what we tried to do with having these on the
17 list to begin with, it is a cost. Once you're an organic
18 producer and you don't want to -- no longer have to transition
19 animals anymore or very few, there's a cost to using a product
20 like this, and it needs to be used very judiciously.

21 But it also needs to be -- we need to be evaluating
22 how we can better work to use it properly and that it gets used
23 within the rule. And just every two years, a different group
24 of animals coming on and somebody saying, well, I had to use
25 the parasiticide this year, if they're open to that. Are they

1 really working a plan to not need it in the future?

2 CHAIR SMITH: Okay. Thank you. Okay. Wonderful.

3 MR. GIACOMINI: Good.

4 CHAIR SMITH: You did it. Thanks a lot, Daniel.

5 MR. GIACOMINI: Thanks, everybody. Great meeting.

6 CHAIR SMITH: Okay. Matt Begley, then I have Peter
7 Gunther, then Tracey Dion.

8 Matt, are you with us?

9 MS. ARSENAULT: Matt is on the line.

10 MR. BEGLEY: Hello. Hi.

11 CHAIR SMITH: Before you jump in, sorry, I forgot
12 that I was going to circle back around to Joe. So it's
13 actually going to be Matt, then Joe, then Peter, then Tracey.
14 Sorry about that.

15 MR. BEGLEY: No problem.

16 CHAIR SMITH: Matt, please state your name and
17 affiliation, and you can get started.

18 MR. BEGLEY: All right. Thank you. My name is Matt
19 Begley, and I am the Materials Review Specialist at OEFFA, Ohio
20 Ecological Food and Farm Association. I'd like to thank you
21 all on the Board for taking the time to listen to everyone's
22 comments. I think that's just great. It's great to be part of
23 an industry that does this.

24 I'd like to just give a few comments on peracetic
25 acid, methionine, and carbon dioxide. Peracetic acid is an

1 essential substance for sanitation in livestock production and
2 food handling which I expect to remain on the National List.
3 The listing at 205.603(a) for peracetic acid restricts the use
4 of this substance to sanitizing facility and processing
5 equipment but does not include a prohibition against direct
6 contact with animals which is found in the phosphoric acid
7 annotation.

8 We've recently had some requests to review the use of
9 peracetic acid for sanitizing robotic milking equipment. These
10 machines contain roller brushes which clean the teats before
11 milking cups are attached. Peracetic acid is used to sanitize
12 the brushes between animals, but will remain on brushes when
13 they contact the teats.

14 We don't allow peracetic acid to be used in this
15 situation, but the lack of clarity in the annotation could lead
16 to inconsistencies among certifiers. So we ask that the Board
17 consider this application in their discussion of peracetic acid
18 and that the annotation at 205.603 be updated if peracetic acid
19 is not allowed to contact organic livestock in this manner.

20 Methionine is a necessary amino acid for poultry
21 animals, and supplementation is especially critical given that
22 the current organic standards restrict these animals to a
23 vegetarian diet. We strongly support the allowance of non-
24 synthetic sources of methionine, including insects and
25 slaughter byproducts, to be allowed in seed to reduce or

1 eliminate the reliance on synthetic DL-methionine.

2 We suggest that organic sources could be allowed
3 without restriction on amount being said. If they're coming
4 from non-organic sources, we support research into methionine
5 levels contained in these sources to inform a restriction,
6 something along the lines of pounds per restricted feedstock
7 per day. This would reduce the need for calculating actual
8 methionine intake which can be an undue burden for some of our
9 smaller growers.

10 And finally, I'd just like to voice our support
11 against the petition for carbon dioxide in greenhouse
12 production. Aside from the need for greenhouse production
13 standards, we do not support the use of fossil fuel byproducts
14 in organic production. Thank you.

15 CHAIR SMITH: Thanks, Matt. Looks like you have a
16 couple questions.

17 Nate, please go ahead.

18 BOARD MEMBER POWELL-PALM: Thanks for your comments,
19 Matt. I just wanted to make sure I heard you right. OEFFA
20 supports the incorporation of slaughter byproducts in poultry
21 rations?

22 MR. BEGLEY: For the use of -- for the
23 supplementation of DL-methionine -- or, excuse me -- for the
24 supplementation of methionine only. Yes.

25 BOARD MEMBER POWELL-PALM: And that would be elevated

1 over synthetic methionine, so you'd want to see that used
2 first?

3 MR. BEGLEY: Yes. I believe it's the -- I don't know
4 if it's just the Canadian standards or the EU also, but yeah,
5 it was like a hierarchy of natural sources. Maybe it was
6 organic sources, natural sources, and then synthetic sources.

7 BOARD MEMBER POWELL-PALM: I see what you're saying.
8 Thank you.

9 CHAIR SMITH: Logan, please go ahead.

10 BOARD MEMBER PETREY: Hi. Thank you. Okay. So a
11 question about the CO2, and I see that you are against adding
12 it to the list. Curious, do you have or know of any
13 alternatives that greenhouse producer users are using for
14 adding or getting CO2 into stuff?

15 My understanding is that the CO2 is depleted, and
16 usually you could just vent the greenhouses, and but during
17 colder weather and in colder climates you're going to have an
18 issue of lowering the temperatures which is really hurting the
19 entire point of the greenhouse. And so you're from a little
20 bit colder area than I am from, and so most of the greenhouses
21 around here don't have that issue because are too hot. Just
22 curious, do you have any alternatives for CO2?

23 MR. BEGLEY: I mean we don't really have anyone who's
24 supplementing CO2. A lot of greenhouse -- we're not a lot of
25 large greenhouse production, so I don't know what people are

1 doing. I don't know if fermenting something in the greenhouse
2 would --

3 BOARD MEMBER HUSEMAN: So the problem is CO2 can't be
4 substituted itself. I just didn't know if there were any other
5 methods to keep the greenhouse warm or something like that
6 to help that if they needed to vent or anything.

7 MR. BEGLEY: I don't really know.

8 BOARD MEMBER PETREY: Okay. Thank you.

9 MR. BEGLEY: Yeah, our concern is just the synthetic
10 fossil fuel byproducts.

11 BOARD MEMBER PETREY: Sure.

12 MR. BEGLEY: Yeah.

13 BOARD MEMBER PETREY: Great. Thank you.

14 MR. BEGLEY: Thanks. Appreciate y'all.

15 CHAIR SMITH: Thanks so much for your comments, Matt.
16 Okay. We have up next is Joe Freeze. Joe, are you
17 here with us?

18 MS. ARSENAULT: Joe is on the call. It's muted.
19 Joe, if you don't have a mute button on your phone you can hit
20 star six to unmute yourself. Want to try that?

21 It looks like he's having trouble unmuting himself,
22 Kyla. Oh, wait.

23 CHAIR SMITH: Oh, we see you, Joe. Oh, I think I
24 just saw -- can you say something?

25 MR. FREEZE: Yeah, are you there?

1 CHAIR SMITH: Yes, we got to you.

2 MR. FREEZE: Thank goodness. Quick introduction. My
3 name is Joe Freeze. I represent Albert Lea Blue River organic
4 seed, and the whole seed lineup. I've been in the seed
5 business 54 years. I have covered from anything west of
6 Michigan, Indiana and south, and that's part of my
7 responsibilities, so I've covered a lot of territory.

8 I've been in organics 15 years of the 54 years I've
9 been in the seed business. And the things that I want to
10 express concerns about are the imports, organic seed.
11 Basically speaking, organics makes up one, one and a half
12 percent of the total acres in the United States. Currently 70
13 percent of the soybeans and probably 30 percent of the corn is
14 imported.

15 We have the acres and the people that can do the job,
16 but we're allowing imports coming in there that do not have the
17 requirements of control, paperwork, and everything else that
18 the American organic farmer has to put up with, and basically
19 speaking, this kind of situation creates major issues.

20 Last year at one time soybeans were \$35 and now
21 they're around 20. Corn was around 10 and a half, and now it's
22 down to six and a half. These inconsistencies are not helpful
23 with stabilizing any kind of industry, and it has put the
24 organic farmer under a great deal of challenges.

25 And the other thing that I want to venture into is

1 the organic seed rule. I've been in this business 15 years,,
2 and I keep hearing that they want to strive towards organic
3 seed only. I still see no real major efforts on that part.

4 The organic seed industry, as far as row crops are
5 concerned, we're quite capable of producing enough organic seed
6 for the seed needed. But we're basically allowing almost 40
7 percent of the seed needs being covered by conventional non-
8 GMO, and that's usually by bigger seed companies.

9 The investment of growing organic seed organically is
10 higher. The yields are probably somewhat less. As far as the
11 seed production is concerned, there's lots of challenges, but
12 we've got to compete and have competed with our competition --
13 the non-CMO side, -- for years.

14 So we have the ability. All we have to do would be
15 have a year or two to gear up to do that, as far as row crops
16 are concerned. I can't necessarily speak for the vegetable
17 side of the organic world, but I suspect that in a lot of cases
18 this will be possible.

19 As far as certifiers are concerned, I don't think
20 they fully understand the seed industry all that well. And
21 basically speaking, they get paid by the acres. The larger the
22 farmer, the more he's likely going to have an influence of what
23 the certifiers allow and don't allow. And those are my three
24 main points.

25 CHAIR SMITH: Thanks for your comments. Joe, it

1 looks like you have a couple questions. Wood, please go ahead.

2 BOARD MEMBER TURNER: Hey, Joe. Thanks for your
3 comments, and thanks for all the work you've been doing in
4 seed.

5 I was curious, can you say a few more words about --
6 you talked about the cost barriers for more producers in the
7 U.S. being involved in the seed production. Can you just say a
8 few more things about that? I'm just trying to get my head
9 around sort of the key barriers, why there's not more seed.

10 Or maybe there is enough seed production, to your
11 point, and so we shouldn't be opening the door to international
12 production, but I'm just trying to get my head around that
13 dynamic a little better. If you could just say why domestic
14 seed producers maybe are not getting into the business.

15 MR. FREEZE: Yes. Well, you know, you're talking
16 about, like I said, one, one and a half percent of the total
17 acres. As far as the seed production end of it is concerned,
18 both inbreds -- as far as corn is concerned -- both inbreds
19 have to come in non-GMO, and basically speaking that creates
20 issues for the genetic developers in that they're trying to
21 develop traits into most of their newer genetics.

22 Basically speaking, it's more difficult to raise seed
23 organically. It requires just more of an investment. And the
24 thing is, the industry is capable of producing enough organic
25 seed if the rule were put that all of the row crops and

1 probably a lot of the other crops had to be certified organic,
2 but you need a year or two heads up.

3 CHAIR SMITH: Allison, please go ahead.

4 BOARD MEMBER JOHNSON: I think Kim was before me,
5 but --

6 CHAIR SMITH: Yep, she wants you to go first.

7 BOARD MEMBER JOHNSON: Okay. Thank you.

8 Thank you for your comments, Joe. This is an area
9 that I've been learning a lot about lately. And I think you
10 said something that's surprising, and I want to make sure I
11 heard you right.

12 Did you say you're supplying 40 percent of the
13 conventional seed market? Or if I didn't get that right, could
14 you speak to -- so organic producers are one of your markets.
15 Are there other producers buying untreated organic corn and soy
16 seed? And if not, are there things you think we could do to
17 sort of grow your market opportunities to help incentivize
18 production?

19 MR. FREEZE: Well, yeah. Basically speaking,
20 companies like Pioneer and LG will produce -- and they cover
21 about 40 percent of the total organic corn market seed-wise.
22 And simply, it's hard for smaller companies to try to pursue
23 only the organic route as far as supplying organic farmers.

24 It's a challenge, and initially when this first
25 started, yeah, probably the seed industry couldn't produce

1 enough organic seed. But a number of companies have gotten
2 involved with it, and they're capable of producing the seed
3 needed to be certified organic.

4 BOARD MEMBER JOHNSON: Okay. Great. Thank you for
5 clarifying.

6 MR. FREEZE: Mm-hmm.

7 CHAIR SMITH: Okay. And you've got one more question
8 here.

9 Kim, please go ahead.

10 BOARD MEMBER HUSEMAN: Thank you, Kyla.

11 And thank you for your comments. We really
12 appreciate you joining us, Joe, and giving your perspective
13 from the seed aspect.

14 Outside of price, can you tell us what are other
15 barriers for farmers to grow organic beans in the U.S.?

16 MR. FREEZE: Well, the barriers basically is that
17 the price stability is so important, and there are challenges
18 of somewhat less yield and the weed control issues that are
19 involved. And, quite frankly, the soybean prices the past
20 couple of years have varied anywhere from 20 to 35 and then
21 back down to 20 again. And, like I said, farmers need
22 stability, and you cannot develop any kind of program and try
23 to maintain it if you have that kind of price instability.

24 BOARD MEMBER HUSEMAN: I understand the price
25 dynamic, but are there challenges throughout the growing cycle

1 that, you know, you talked about 30 percent of the demand is
2 grown in the U.S., or 70 percent is imported to satisfy demand.
3 I'm trying to -- and let's set price aside -- We understand the
4 dynamic of the pricing model. But are there other grow
5 challenges that kind of disincentivize a farmer from wanting to
6 grow beans in the U.S.?

7 MR. FREEZE: Well, basically it's a matter of, you
8 know, the weed control is one of the biggest challenges. If he
9 can control his wheat, then he can have yields of 40 to 70
10 bushels TO the acre. That's not so much genetics or anything
11 like that. It's just with soybeans particularly it's weed
12 control and, basically speaking, there's some reluctance to try
13 to pursue this simply because they want to look good with their
14 neighbors. And the incentives for growing soybeans
15 organically, like I said, there's no stability to it.

16 BOARD MEMBER HUSEMAN: Okay. Thank you, Joe. That's
17 helpful. I'm just trying to find other ways. I know the
18 markets are volatile in all spectrums, and looking at ways that
19 we can try to help encourage the U.S. farmer to grow some more
20 organic beans. So I appreciate your time. Thank you.

21 MR. FREEZE: Yeah, well, it's the problem of cheap
22 imports. That's the problem.

23 CHAIR SMITH: Thanks for joining us today, Joe, and
24 glad we got you off mute.

25 Okay. Up next we have Peter Gunther, then Tracey

1 Dion, and then Joseph Kibowatt.

2 Do we have Peter?

3 MS. ARSENAULT: Peter's on the line. We're just
4 getting him unmuted here. Peter, it looks like you're on the
5 phone line. So if you don't have a mute button, you can try
6 star six to unmute yourself.

7 MR. GUNTHER: All right. Can you guys hear me?

8 CHAIR SMITH: Yes.

9 MR. GUNTHER: Can you hear me?

10 CHAIR SMITH: Yep, we got you, Peter. State your
11 name and affiliation, and then you can get started.

12 MR. GUNTHER: All righty. My name is Peter Gunther,
13 and I'm an organic farmer in Texas, and I raise peanuts, corn,
14 wheat, and various hay. I've been certified organic since
15 2013, and organic has been a game changer for my operation, and
16 I'm very grateful for all the work that the NOSB does to
17 promote integrity.

18 A big issue facing organic farmers right now is
19 unfair competition coming in from imports. I'm impressed that
20 the Certification Subcommittee has heard this problem loud and
21 clear, and want to express my support for using testing as a
22 tool to make sure that imports that are coming over the border
23 are actually legitimate.

24 The other thing I'd like to comment about is growing
25 the organic market. There's a great amount of energy and

1 resources being put into transitioning organic farmers to
2 organic, but it's going to be a tough sell if the market isn't
3 there when folks complete the transition. I'd like to say how
4 I support the work being done by CACS to highlight how we can
5 improve the overall organic market by understanding all of the
6 challenges. Thank you.

7 CHAIR SMITH: Thanks for your comment, Peter. Any --
8 oh, got some questions here.

9 Kim, please go ahead.

10 BOARD MEMBER HUSEMAN: Hi, Peter. Thank you for your
11 comments. I have a couple of questions for you.

12 MR. GUNTHER: Okay.

13 BOARD MEMBER HUSEMAN: One is where do you farm in
14 Texas?

15 MR. GUNTHER: West Texas.

16 BOARD MEMBER HUSEMAN: Okay.

17 MR. GUNTHER: West Texas, east New Mexico.

18 BOARD MEMBER HUSEMAN: Which -- like Deaf Smith
19 County, Castro County? Where are you at?

20 MR. GUNTHER: Oh, it's like Cochran County, Hockley
21 County, Yoakum County, Gaines County.

22 BOARD MEMBER HUSEMAN: Okay. Any of those fires
23 impact you?

24 MR. GUNTHER: No, no. Thank God they were not
25 anywhere around me.

1 BOARD MEMBER HUSEMAN: No, I understand that. I'm
2 very familiar with the West Texas farming community. So first
3 I want to say thank you for being a West Texas organic farmer.

4 And the other question I have for you is when you
5 look at talking about growing markets and outlets for your
6 products, can you speak to where do your products go, and do
7 you have any logistics or rail versus truck, any kind of
8 barriers and bottlenecks in that space to help get your
9 products where they need to go to help grow this market?

10 MR. GUNTHER: Okay. So the peanuts, they go to a
11 local buying point, and there they get shelled and shipped off
12 to various buyers. So I don't have an issue with, you know, as
13 far as trucking, we don't do anything on rail over here. As
14 far as the hay goes, corn, all that kind of stuff, that will
15 get sold to the local organic dairies and feed lots. So we
16 don't have an issue there with that.

17 We do have an issue with -- I know there's a lot of
18 -- I know we've been getting a lot of hay imported from Mexico,
19 and, you know, that dropped our hay market almost in half last
20 year when that all hit over here.

21 As far as the peanut goes, I've been growing peanuts,
22 like I said, for many years, and I've never seen a decrease in
23 demand for U.S. grown peanuts, and we did this year. About two
24 months ago, it was about the time whenever they start handing
25 out contracts for all the local farmers, organic farmers, to,

1 you know, kind of know how many acres they're going to get and
2 all that. We've never been shorted on that, and this year
3 they've cut most farmers, and not only on acres, but they also
4 went down on price. And I'm told the reason that is is because
5 the demand is not there.

6 And I don't know. I know there's a lot of peanuts
7 being imported, and I know that we can't compete at those
8 levels that they can bring it in at. I mean our conventional
9 prices are about the same as other countries' organic prices
10 coming in. That's with shipping over here and everything. So
11 I feel like there's kind of a slowdown in that.

12 So I think the end users -- or the end buyers, I
13 should say -- is getting imports for a lot cheaper, and so
14 therefore they don't need as much organically grown peanuts
15 from the U.S, so that's really affecting our markets right now.

16 BOARD MEMBER HUSEMAN: Okay. Thank you, Peter. I
17 want to highlight the diversity of farming operations and the
18 different areas of the U.S. that we've been able to hear on the
19 NOSB calls, and your voice and lens of the market space that
20 you're in is very valuable. So thank you again for your time,
21 Peter.

22 CHAIR SMITH: Amy, please go ahead.

23 VICE CHAIR BRUCH: Actually, Kim kind of touched on
24 my question. I wanted an overview of the peanut market.

25 Thank you, Peter, for providing that, and I agree

1 with Kim. It's wonderful to have the diversity of farmers'
2 voices on this call. Thank you so much.

3 I'll defer to Nate.

4 BOARD MEMBER POWELL-PALM: Thanks, Amy.

5 Thank you for your comments, Peter. Really
6 appreciate you make the time to join us today. I realize it's
7 a busy time of year.

8 Could you speak a little bit to when the assertion is
9 made that American farmers are disadvantaged because somehow
10 there's a growing advantage in other countries, how good are we
11 at growing peanuts? Are there other countries that can grow a
12 ton more than us that would result in these sort of lower
13 prices, or am I missing something there?

14 MR. GUNTHER: No. I mean it's my understanding that
15 a lot of the peanuts that come from other countries, the
16 quality isn't great. And so, therefore, they try -- I think
17 what they're doing, and I don't know this, obviously I can't
18 prove it -- but what I feel like is going on is they are, you
19 know, taking those peanuts from overseas, bringing them in, and
20 blending them with the American peanuts, the organic peanuts.
21 And, of course, they're organic, too, is what they're saying.
22 So but there's nothing that proves that they are.

23 And so I feel like for those guys -- I mean we have
24 so many restrictions, and it takes so much more money for us to
25 grow the crop apparently than it does other countries, labor,

1 fuel, all things. And so I don't know -- I mean, I can't say
2 that other countries can grow more of them. But if they're not
3 held to the same standards as we are, then obviously they can
4 grow them cheaper. I mean, I think they could grow them
5 cheaper anyway, but I don't think it would be -- the difference
6 shouldn't be that much.

7 BOARD MEMBER POWELL-PALM: Yes, I really appreciate
8 that. So it's not that there's an obvious reason they'd be
9 coming in cheaper, to make us consider are they coming in
10 legitimately. Is that correct?

11 MR. GUNTHER: Say it again. I didn't quite
12 understand the question.

13 BOARD MEMBER POWELL-PALM: Yeah, it's not obvious
14 that anyone can produce them cheaper. So then we would ask the
15 question, are they coming in legitimately?

16 MR. GUNTHER: That is correct, because it takes so
17 much manual labor and equipment to produce these peanuts that,
18 you know, in other countries I'm sure their labor forces are a
19 lot cheaper than ours are here. Obviously, they probably have
20 cheaper equipment. There's a whole lot of things that, yes,
21 they can do cheaper.

22 But I feel like we just are on a very unfair
23 advantage, like we're not in a level playing field here. We
24 have so many things that we have to abide by, and which is
25 great. I mean we need that, obviously. And the reason they

1 have that in place is because they know that if people are left
2 unchecked, things go wrong.

3 And they don't have that in other countries. And so
4 it's when they import it, and there's no one holding them
5 accountable, then I just feel like why are we pushing the
6 American farmer so hard to be legitimate when there is next to
7 nothing being done to hold their feet to the fire or hold them
8 accountable when it's imported into America? And so it's just
9 very unfair for the American farmers.

10 And, I mean, it's hard enough as it is with inflation
11 and everything else. I mean all the farmers, we're talking
12 about it. So I don't know what the Board can do about that to
13 make a recommendation to get that ball rolling.

14 BOARD MEMBER POWELL-PALM: Well, we really appreciate
15 hearing your voice and taking the time, and we'll keep working
16 on these things. We really appreciate your time today.

17 MR. GUNTHER: Thank you.

18 CHAIR SMITH: Thanks, Peter.

19 Next up we have Tracey Dion, then Joseph Kibowatt,
20 and then Guy Jodarski.

21 Tracey, state your name and affiliation, and then you
22 can get started.

23 MS. DION: Hello, NOSB. My name is Tracey Dion. My
24 family and I converted our farm to certified organic in 2017.
25 Coming from the conventional sugar beet world, our journey to

1 organic farming has been one of discovery. Every day that we
2 farm organically, we're not just helping our own businesses,
3 but we're also having a ripple effect. All organic farmers
4 are. From eliminating synthetic nitrogen to incorporating
5 animals, organic is a type of farming that benefits everyone,
6 and the consumer knows it.

7 I'm endlessly grateful for how much confidence the
8 consumer has placed in us as organic farmers. And it's all
9 hats off to the founders who not only built this market but
10 pioneered the growing techniques that we have today. U.S.
11 organic farmers have boosted their yields, and we're certainly
12 out-yielding our foreign competition. American organic farmers
13 are the most efficient, highest-yielding organic producers in
14 the world, and I'll tell you, we knock the socks off of
15 everyone else when it comes to growing feedstuffs.

16 But despite being good farmers with good yields,
17 we're facing a serious problem. Imported organic grains are
18 being brought in well below the cost of production. And to be
19 clear, there is no one who is out-yielding us when it comes to
20 corn and soybeans. There's no one who has the technology
21 potential to maximize organic production. So the only other
22 advantage left is selling conventional grains as organic.

23 As American producers, we love competition. We're
24 ready to compete, and we know we'll win. But we have to
25 compete on a fair playing field. We have to have grain

1 imported and sold in the U.S. as organic actually be organic.
2 We have to have the same level of scrutiny on imported grains
3 as we do on domestic grains.

4 I was so excited to see that NOSB is hearing and
5 amplifying farmers' concerns, especially when it comes to
6 testing. The CACS discussion document is a great start, but I
7 want to highlight one fact for you. Montana lost a major
8 export market for our wheat when Italy decided they were going
9 to test down to the parts per billion for glyphosate, and they
10 found levels that are ambient in the environment. They denied
11 import of that wheat into their country and sent it back to us.

12 It astounds me that not only is Europe testing
13 everything we send them, but we are hardly testing anything at
14 all that comes into the U.S. I appreciate the mandatory 5
15 percent testing, but we can do so much better. American
16 organic farmers need the system to do better. We need a fair
17 playing field, and testing imported grain is a great start.
18 Thank you.

19 CHAIR SMITH: Thank you, Tracey. Any comment or
20 questions for Tracey? I see one from Nate.

21 BOARD MEMBER POWELL-PALM: Thanks so much for joining
22 us today, Tracey. We realize it's a busy time of year.
23 You said something that really, you know, I think speaks to a
24 lot of the questions we've heard over the last couple of days,
25 that American farmers are pretty darn good at growing what we

1 grow -- corn, hay, soybeans. Like, there's not a lot of places
2 that grow them better than us.

3 And so I've been trying to decide, is the
4 conversation we're having over the last few days a
5 protectionist movement, or is it just saying we want a fair
6 playing field? And if I hear you, it sounds like American
7 farmers are ready to go to the mats, but we want it to be fair.
8 We want to have the same expectations for all organic stuff
9 moving around the world. Am I hearing you right?

10 MS. DION: You are hearing me right, yes.

11 BOARD MEMBER POWELL-PALM: I really appreciate it
12 today. Thank you for joining us.

13 MS. DION: Thank you.

14 CHAIR SMITH: Thanks, Tracey. Thanks for joining us
15 today.

16 Next up we have Joseph Kibowatt, which we're unsure
17 if you are on the line. So if you are there, if you could let
18 yourself be known. If you're on the phone, star six, put it in
19 the chat.

20 Otherwise, we'll move to Guy Jodarski. Jodarski,
21 sorry. Did I say that right? Guy, are you there?

22 MR. JODARSKI: Well, yes. Good afternoon.

23 CHAIR SMITH: Yes,.

24 MR. JODARSKI: I'm having trouble with my camera.
25 I'm sorry. I apologize for that.

1 CHAIR SMITH: All right. No worries. You can state
2 your name and affiliation --

3 MR. JODARSKI: My name is --

4 CHAIR SMITH: -- yep, and then get going.

5 MR. JODARSKI: Yep, my name is Guy Jodarski. I
6 represent CROPP Cooperative/Organic Valley. Thank you to the
7 NOP and the Board for the chance to provide comments on behalf
8 of our cooperative.

9 I work as a veterinarian for our farmer members and
10 with cooperative staff in the area of animal health. I lead
11 our veterinary team that works with farmers, industry partners,
12 and allied academic researchers. I also serve on the Livestock
13 Advisory Panel for OMRI and help review materials and inputs
14 for use in organic livestock production.

15 In regard to meloxicam, Organic Valley submitted a
16 petition to the NOP to add meloxicam to the National List. The
17 veterinary team at Organic Valley fully supports this petition.
18 We believe this material will provide organic producers an
19 improved tool to reduce pain and suffering of livestock.

20 Meloxicam is a non-steroidal anti-inflammatory agent
21 less likely to cause side effects than the currently available
22 option, flunixin. Meloxicam can control pain, inflammation,
23 and fever. It is widely used in humans, animals, and non-
24 organic dairy production. Its long duration of activity and
25 ease of administration support the fact that meloxicam provides

1 pain control for livestock superior to the currently available
2 options allowed for organic production.

3 Regarding sunset materials, we support relisting the
4 following materials currently being reviewed for possible
5 sunset: Atropine as an antidote for poisoning; hydrogen
6 peroxide and iodine essential for wound care, surgical
7 procedures and equipment disinfection; magnesium sulfate for
8 medical treatment; tolazoline and xylazine essential for humane
9 delivery of surgical procedures; trace minerals and vitamins,
10 nutritional support for immune function and essential
11 supplementation.

12 We support relisting fenbendazole and moxidectin on
13 the National List. Good management eliminates the need for
14 parasiticides in most cases. However, when management
15 practices fail and parasitism is severe, there is a need for
16 synthetic treatments as natural alternatives often fail under
17 these conditions.

18 In response to the questions regarding these
19 materials, are there suggestions to improve the annotation?
20 The annotation could outline guidelines for emergency
21 treatment. For example, documentation of parasite load by
22 fecal examination, evidence of severe physical signs, and/or
23 veterinary recommendation.

24 Which age class of animals do certifiers see their
25 clients requesting approval for emergency parasiticide use?

1 Severe clinical parasitism is seen almost exclusively in 6 to
2 18-month-old cattle, an exception being lungworms which affect
3 both young stock and mature cattle.

4 Thank you for the opportunity to provide testimony to
5 the Board. I'm happy to answer any questions.

6 CHAIR SMITH: Thanks so much, Guy. Any questions
7 from the Board? I see one from Nate.

8 BOARD MEMBER POWELL-PALM: Thank you, Dr. Guy.
9 Appreciate your comments today. We had really good
10 conversation earlier with Dan Giacomini about animal welfare,
11 and I don't need to extend it quite that long for my question
12 to you. But I was hoping you could speak to how do we get the
13 consumer aware of all that goes into animal welfare in
14 organics?

15 It seems like we have some of the most incredible
16 regulations for animal welfare, but that is never a
17 consideration when we're pitching organic to consumer for
18 animal livestock products. Any thoughts there?

19 MR. JODARSKI: Yeah, certainly. I think the problem
20 is the animal welfare, you know, the topic was kind of seized
21 by conventional and organic large producers who really designed
22 certification systems that were really advantageous to the
23 large operations, and specifically in regards to record
24 keeping, numbers, data, that sort of thing.

25 I think we've really failed in being able to talk

1 about the freedom our animals have, the pasture, how important
2 that is, the grazing, all the benefits that not only to the
3 cattle but to the environment, to the soil. I think all those
4 things have been missed, and we've really gotten caught in this
5 bureaucracy of looking at animal welfare through certification
6 systems that are really biased towards large systems with great
7 record keeping systems.

8 BOARD MEMBER POWELL-PALM: I appreciate that. Thank
9 you for your time today.

10 MR. JODARSKI: You're welcome.

11 CHAIR SMITH: Thanks for joining us.

12 Up next we have Ty O'Connor, then Judy Osowitz, and
13 then Lance Bruch.

14 Ty, are you there?

15 MR. O'CONNOR: I am here.

16 CHAIR SMITH: Wonderful. State your name and
17 affiliation, and then you can get to it. You've got your
18 assistant there with you today, I see.

19 MR. O'CONNOR: Yes, we are running rampant. We're
20 starting to get all the -- everything planted, but I'm happy to
21 join you guys. This is an awesome meeting so far.

22 Ty O'Connor from Ekalaka, Montana. We are a
23 certified organic grain, pulses, and cattle in this part of the
24 state. We run and operate on about 53,000 acres. We do about
25 13,000 acres of dry land farming. We use -- the cattle are

1 very crucial to our cropping system, so I would say we are not
2 a farmer without the cattle to be involved.

3 We've grown our operation consistently over the last
4 10, 12 years. In the last couple years, we've added a USDA
5 organic certified beef and pork and sheep slaughtering facility
6 on the ranch. As far as I know, this is probably the only
7 ranch-owned USDA organic facility across the nation. We're
8 excited to -- I've got my helper with, so he's adding a little
9 bit. Hold on.

10 We're excited to see USDA invest in organic via the
11 Organic Transition Initiative, and there's a lot of good work
12 to be done, but I do have one concern. The NRCS EQIP-Organic
13 Transition Initiative could be a great program, but it is
14 actively not being rolled out in Montana.

15 For the 823 program, in Montana we were only given 30
16 days in December of last year to sign up for that. The
17 requirements set out did not take into consideration the
18 regions like Montana and like where we farm down here, that we
19 only get 10 inches of moisture.

20 Now, to be clear, we are really good at growing crops
21 organically in Montana. We have a thriving organic community,
22 and the EQIP money would certainly help enhance the transition.
23 But as we speak, farmers in Montana are not being given the
24 chance to participate in the programs that are so important to
25 the success of Organic Transition Initiative.

1 I'm hoping that the whole organic community can work
2 together to have the NRCS open the sign-up periods for the 823
3 again in all states. It would also be very helpful for the
4 NRCS to publish each state's 823 sign-up deadline. This could
5 be a great opportunity for the organic around in the country.
6 I'm hoping we don't miss the boat by not making sure the
7 farmers get a fair chance to sign up for this. Thank you for
8 your time.

9 CHAIR SMITH: Thanks so much, Ty. It looks like you
10 and your assistant have some questions from the Board, so stick
11 with us here.

12 Brian, please go ahead.

13 BOARD MEMBER CALDWELL: Hi, Ty. Thanks a lot for
14 your comments. I was really intrigued to hear that your
15 processing facility includes hogs, and I'm just curious what
16 you see the market for organic pork to be and what you see the
17 barriers are to having more production.

18 MR. O'CONNOR: I would like to tell you that we are
19 raising organic pork, but we are not. Our pork is conventional
20 that we are raising just because we do not want to add another
21 wrinkle of farrowing hogs out on our facility. So we do
22 process pork, sheep, goats, but we do not run any organic
23 ourselves.

24 BOARD MEMBER CALDWELL: Okay. Thanks.

25 MR. O'CONNOR: It's organic beef right now, but we

1 would encourage any other producers that are organic certified,
2 if they need a place to harvest those animals, we can handle
3 that.

4 CHAIR SMITH: Wonderful.

5 Wood, please go ahead.

6 BOARD MEMBER TURNER: Hi. I appreciate the 823
7 comments, but I'm another interested person about your
8 slaughterhouse. Can you say more about -- so has that
9 dramatically improved your ability to compete, and you mind if
10 I ask, did you self-finance, or how difficult was that to get
11 built?

12 MR. O'CONNOR: We self-financed. I had to put a
13 ranch up for collateral because the banks don't want anything
14 to do with a slaughtering facility. And I guess I thought this
15 would put us like about six steps ahead in marketing and
16 selling our organic product, and we have found out we are
17 probably right back where we started.

18 So we are working on just kind of working our way out
19 locally, and we are doing non-organic product from the ranch
20 also, like our cull cows things that aren't certified. And
21 then our organic product is pretty much solely going online
22 right now. So that's kind of it in a nutshell. I really
23 thought that we would be able to take advantage of, you know,
24 taking a couple steps forward by eliminating some middlemen,
25 but it's extremely hard to get into these big grocery stores.

1 CHAIR SMITH: Thanks, Ty.

2 Nate, please go ahead.

3 BOARD MEMBER POWELL-PALM: Thanks very much for your
4 comments today, Ty. 823, as far as I see it, is an effort by
5 the USDA to make the transition easier, to help folks get
6 through that transition. And I worry, as you describe it, that
7 we're going to have -- because it's such a short sign-up period
8 -- on paper not a lot of interest because not a lot of people
9 signed up.

10 From your vantage point, are there a lot of acres
11 that were hunting for this kind of support? And if it was made
12 available again, do you feel like that there would be a lot of
13 people ready to sign up for 823?

14 MR. O'CONNOR: Oh, yeah, I would say there is a lot
15 of acres that would be ready to sign up. When we looked at
16 this, and we started looking at the requirements, it wasn't
17 suitable for eastern Montana, so we would have failed even if
18 we would have got signed up. But the sign-up period was so
19 short. And there's quite a few acres around our area in
20 eastern Montana that were interested in this program, but as
21 soon as they started looking at the requirements, and then of
22 course they were already past the sign-up date because nobody
23 knew about it. So yeah, I mean, I think it needs to be opened
24 up, and I think there would be a lot more interest in this
25 program, especially if it was made knowledgeable, and then we

1 made it more suitable for the climates in different regions.

2 BOARD MEMBER POWELL-PALM: Absolutely, yes. Thank
3 you so much for that. We've heard a lot of farmers bring this
4 up as a concern, and so we're going to work to elevate it.

5 CHAIR SMITH: Thanks so much for joining us and
6 speaking comments to, yeah, your production, and we'll let you
7 get back to your day, and thanks to your assistant as well.

8 MR. O'CONNOR: Thank you, guys.

9 BOARD MEMBER POWELL-PALM: Thanks, Ty.

10 CHAIR SMITH: Okay. Up next we have Judy Osowitz,
11 and then Lance Bruch, and then Charlotte Vallaeys.

12 Judy, are you there? I don't know if we have Judy.
13 I feel like we weren't finding her.

14 MS. ARSENAULT: We didn't find Judy, but there was a
15 bunch of people on the phone only.

16 Judy, if you're one of the phone-only people, you can
17 hit unmute if you have an unmute button, or star six to unmute
18 yourself.

19 CHAIR SMITH: Okay. We'll move to Lance Bruch, and
20 then after Lance actually will be Steve Boyda, and then Mark
21 Smith, and then we'll take a break.

22 Lance, are you there?

23 MR. BRUCH: I am. Can you guys hear me?

24 CHAIR SMITH: I sure can. State your name and
25 affiliation, and then you can get started.

1 MR. BRUCH: Sure, you bet. Thanks for having me.
2 Lance Bruch, and I'm in Northwest Iowa around Emmitsburg, kind
3 of a unique area for organics because there's a ton of organics
4 around here. Really good area, good crops are growing. It's
5 good ground. So all of that helps with efficiencies, and
6 there's always somebody to lean on and ask questions and things
7 like that.

8 So all of that being said, you know, my biggest
9 challenge would be -- as a lot of these other guys are saying
10 -- is the pricing. Last year we were selling beans for \$35,
11 \$40 almost, and now they're half almost, and corn's the same.
12 And we always just want to make sure that the stuff that's
13 coming in from foreign stuff is getting tested and it will get
14 like it's supposed to be, like they say it is, whether it
15 really is or not.

16 You know, I haul a load of corn to the elevator.
17 Every single load gets tested before I can dump it. So they
18 probe it, they run their tests on it. It takes ten minutes.
19 You sit there, they radio you out, and they dump it all.

20 If we're testing every load of corn and every load of
21 beans from every farmer out here, you know, we probably need to
22 do a better job with maybe some of the testing of the foreign
23 stuff. Like same thing as some of these other guys have said.
24 We're all kind of probably on the same page. When the prices
25 change drastically as they have in the last year, you kind of

1 figure you know all what's going on.

2 So that would be something that, you know, we're in a
3 good area. We can really produce good crops, and we have the
4 efficiency to do that, and we have enough crop around in
5 organic that markets are fairly close, so none of that poses
6 much of a challenge. But, you know, we want to do it and be
7 profitable at it or else it gets kind of futile. And as Joe
8 from Albert Lea said before, raising soybeans at 20 bucks is a
9 real challenge because trying to keep them clean is a barrier,
10 and then you have to sell them for that price, at the end of
11 the day it really doesn't work out very well.

12 So that's mostly all I had. I just wanted to -- you
13 made a comment, some of the other guys, about some of the
14 foreign stuff and make sure we're testing if we need to to try
15 and make sure that that stuff is what it's supposed to be when
16 it's coming in.

17 CHAIR SMITH: Thanks so much, Lance. It looks like
18 we have a question here from Kim.

19 Kim, please go ahead.

20 VICE CHAIR BRUCH: Hi Lance. Thank you for your
21 time. I know it's hard for farmers to be engaged this time of
22 year, and I really appreciate you taking the time to meet with
23 us today.

24 MR. BRUCH: You bet.

25 VICE CHAIR BRUCH: I have a couple of questions. My

1 first one is do most of your row crops go to food or feed
2 outlets, and have you seen any change in the dynamic of the
3 outlets that you have for your crops?

4 MR. BRUCH: Most of mine are feed. There is
5 neighbors doing some food, food-grade corn and things like
6 that. I don't just because it takes a little bit more
7 management from drying and stuff like that. That's got to be a
8 little bit closer watched, and so I have not done it.

9 So I just -- So most of mine, 90 percent of it I
10 think around here probably goes to just feed stuff. So yeah,
11 dynamic-wise, no. I mean there is a better price there I
12 suppose, I think, from what I hear and stuff out of it, but
13 takes a little harder to get there. And, you know, obviously
14 if you did it and it didn't make food stacks it would go to
15 feed, which would be okay too, but, you know, you've got to
16 have a little bit better quality corn, higher test weight, and
17 dry it slower and stuff like that. So that's why I don't.

18 VICE CHAIR BRUCH: Okay. And then you mentioned that
19 you haul your crops to an elevator. So it sounds like you have
20 somewhat of a local outlet, and you truck your products
21 directly. Is that correct?

22 MR. BRUCH: Correct, yeah. Since there's enough
23 acres around here and enough of a big enough organic area, the
24 market is -- that's really helped kind of find some more
25 markets. So most of my corn goes 30 miles, which is pretty

1 good, and beans are maybe 50, and there are several elevators.
2 And then, you know, if you want to have the stuff picked up,
3 that's always an option. There's people doing that all the
4 time too.

5 So logistically-wise we're in really good shape, and
6 we're in a good area with a lot of good producers. So you
7 know, there's always -- if you need a question, you need help,
8 there's always somebody willing to help you. So that stuff all
9 helps raise really good crops, and there's availability for a
10 lot of different things that some of these places don't have.

11 A lot of hogs, a lot of chickens, the litter in the
12 dirt is readily available so it helps raise a good crop. And
13 so when you're raising good crops, good quality crops, you
14 know, it's nice to get a fair price for it and, you know, I'm
15 not 100 percent sure we're getting that. So that would be my
16 one thing that I'd like to see, just a little bit tighter
17 security from the standpoint down the road, I guess.

18 CHAIR SMITH: Excellent. No, thank you. It's good
19 to hear, too, the demand side and having optionality to move
20 products, and what that structure looks like too. So I
21 appreciate your comments.

22 MR. BRUCH: You bet. Yeah, no problem.

23 CHAIR SMITH: Got a couple more here, Lance.

24 Nate, please go ahead.

25 BOARD MEMBER POWELL-PALM: Lance, thanks so much for

1 joining us today. Could you tell us a little bit more about
2 the area that you farm in? Are you sort of in an organic
3 desert? Do you have a lot of organic neighbors?

4 MR. BRUCH: No, I do, yeah. From me east about --
5 I'm in Emmitsburg -- and if you go east 25 to 30 miles, 40
6 miles, you know. you can drive by about as many organic farms
7 as conventional farms. So it's a huge area, and it's growing
8 every year. There's more and more guys and acres, and more
9 guys just going into organic.

10 So it's a cool area that way. It kind of got started
11 by a few guys, several in the late 90s took ground out of CRP,
12 went into organic, and it's just really exploded since then.
13 So I mean, that's basically why I started. My neighbors all
14 around me were doing it, and they wanted it done if I could so
15 that it helps some of with contamination for them. And I said,
16 well, I'll start doing some if you help me along the way. So
17 that's basically how I got into it.

18 So all of that has helped all these other people, and
19 everybody talks to everybody it seems like a lot until you know
20 it, and you learn a lot, and it's easy to -- you got problems,
21 it's easy to kind of help each other along. Whereas, you know,
22 if you're out in the middle of nowhere doing it by yourself, it
23 would be a lot more challenging.

24 BOARD MEMBER POWELL-PALM: Thank you so much for
25 that. Could you describe kind of how good are your yields?

1 Not to put you on the spot, but do you feel like you are
2 competitive and you're a high yielder? Can you talk a little
3 bit about your corn and bean yields?

4 MR. BRUCH: Yeah, I think we're in a really good spot
5 ground-wise. I mean we've got excellent farmland and ,you
6 know, last year my farm was probably in the 190 range. Beans
7 were 55, something like that.

8 So we have the capabilities to raise really good
9 yields. If you keep the weeds out and get a few timely rains
10 and do it outright, you can raise really good crops because
11 fertility is good, land is good, and you get enough manure and
12 stuff like that, and you've got good ground, and you get
13 everything set right, keep them clean, you can raise pretty
14 good crops doing that. So we're just in a super good area with
15 really good dirt, and all of that helps raise good crops.

16 BOARD MEMBER POWELL-PALM: And so my last piece to
17 this question is, it sounds like there's 100,000 plus acres in
18 your area. It sounds like you can raise good crops. It sounds
19 like we can raise all of the feedstuffs that we need right here
20 in America. Would you agree with that?

21 MR. BRUCH: No, I would totally agree with that. I
22 think there's a -- I mean if the price is a little bit better,
23 then you have more guys wanting to do it also, and so then you
24 just - you would raise more crops also.

25 And I don't know -- you guys know the numbers better

1 than me of course today, but I think we could absolutely raise
2 enough here because there's enough -- just right here, like I
3 say, there probably is close to 100,000 acres not too far away
4 in a maybe three or four-county area. And so why can't we just
5 expand that and raise our own crops here instead of getting
6 them from, you know, wherever?

7 BOARD MEMBER POWELL-PALM: Thank you.

8 MR. BRUCH: Yeah, thanks, Nate.

9 CHAIR SMITH: Amy, please go ahead.

10 VICE CHAIR BRUCH: I just don't have my hand up soon
11 enough. Nate took my questions, actually, because I wanted to
12 just learn a little bit more about Lance's area. I thought it
13 was good to highlight that it's just a unique spot for growing
14 organic. So thanks, Lance, for joining us. Thanks, Nate, for
15 your questions, too.

16 MR. BRUCH: Yeah, no problem. Thanks for having me
17 on, guys.

18 CHAIR SMITH: Yeah, thanks so much, Lance.

19 Okay. next up do we have Steve Boyda? And then I
20 think we don't have Mark Smith, but after Steve goes -- maybe
21 I'll do one sweep around for anybody who we missed in this
22 first chunk, and then we'll take a break.

23 Steve, you can state your name and affiliation, and
24 then get started.

25 MR. BOYDA: Yes. Good afternoon, and thank you to

1 the Board for the opportunity to make any comments. My name is
2 Steve Boyda. I'm an organic field crops producer in Northeast
3 Kansas, primarily growing corn, wheat, soybeans, which are the
4 staples for this region.

5 I'm commenting today on behalf of the field crop
6 producers who comprise the collective membership of OFARM,
7 where I serve as secretary. The primary concern for our
8 membership is the devastating market impact from the continuing
9 flow of imported organic feedstuffs. Markets for the primary
10 feed grains have fallen to levels that come near and are, in
11 some cases, even below actual production costs.

12 As we've mentioned in our written comments, the
13 dismal market picture is causing some certified producers to
14 abandon their organic commitment and certainly is putting a
15 damper on increasing acreage through new transition. While we
16 fully embrace the concept that it is much more than just a
17 better market, economic viability is still the driving factor
18 in making the final transition decision.

19 While we applaud the many and often successful
20 initiatives to provide for transition assistance through new
21 and creative government programs such as greater assistance
22 through NRCS, improvements to federal crop insurance programs
23 to better serve organics, the long-term viability of an organic
24 operation is still based on economic profitability.

25 We fully support efforts underway to bring more

1 extensive residue testing into the picture. However, enacting
2 significant change still has many hurdles to overcome. One
3 area that could have the more immediate impact is to more fully
4 utilize existing authority for sampling and testing. The much
5 needed and now enacted elements of the SOE have passed or have
6 paved the way for greater scrutiny. The question is, are we
7 fully using the surveillance authority the SOE has created?

8 Much is said about risk-based decisions about where
9 to use this authority. Obviously, with the recent increase in
10 imports from Africa, the horse has left the barn long before a
11 mass balance audit can be completed.

12 Let me put it in a farmer's terms. If it looks like
13 something is wrong, and it smells like something is wrong, it's
14 time to check it out. This is accomplished by boots-on-the-
15 ground examination of the source of irregularities. Obviously,
16 the NOP now has significantly increased capacity to perform on
17 their obligation as the organic industry watchdog. Added
18 certifier scrutiny, enhanced inspector training, and
19 initiatives to establish mass balance audits are all plausible
20 efforts.

21 It does appear, however, that the actual intervention
22 in questionable activities still remain somewhat limited.
23 While there are some sometimes legitimate concerns for
24 government overreach, in our humble collective opinion there is
25 plenty of opportunity to examine areas that just simply don't

1 add up or smell right. So what is our ask of the settings of
2 NOSB? We believe that there is room for a greater direct
3 interaction in the NOP process. You spend significant time on
4 evaluating of the ingredient list. Is the evaluation of NOP
5 process and procedures subjected in that level of scrutiny?

6 Possibilities that NOP oversight should be higher
7 priority for the study and debate, thus more specific guidance
8 improved. And thank you for allowing the staff comments.

9 CHAIR SMITH: Yeah, thanks so much, Steve. Appreciate
10 your comments. Looks like you have a question from Amy.

11 Amy, please go ahead.

12 VICE CHAIR BRUCH: Sure.

13 Steve, thank you for joining us. Thanks for your
14 written comments as well as the oral ones. I just had a
15 general question for you. When we look at the SOE, the
16 Strengthening of Organic Enforcement rule, the final rule talks
17 about complex supply chains, and when we are talking in our
18 organic circles, we hear that a lot -- especially in feedstuffs
19 -- about these international complex supply chains.

20 I'm just curious, on your viewpoint, why do you think
21 there's a need for the supply chain on something with a low
22 margin, such as grains to be complex? Why do you think that
23 is?

24 MR. BOYDA: Well, I look at it from a producer and,
25 you know, with SOE coming in, I'm going to have to put labels

1 on all my containers that ship to verify it stays there. How
2 do you do that on a barge that's coming from Ukraine and comes
3 over and dumps a whole bunch of so-called organic wheat in the
4 Midwest?

5 It's got to -- there has to be more complexity than
6 just trusting that it loads up, it ships over, and it's all
7 okay. There's too many possibilities of greed and fraud to
8 take place in between, and I just wish that the same scrutiny
9 was imposed on imports as what we have on our domestic
10 production.

11 CHAIR SMITH: Thank you, Steve. Appreciate that.

12 Nate, please go ahead.

13 BOARD MEMBER LEWIS: Do you have any suggestions for
14 specific tests we should be doing to detect some of these
15 potentially fraudulent loads coming in?

16 MR. BOYDA: I think there's new testing on perhaps
17 spraying for pests. There's a long ways to ship from over
18 there to get here, and I'm afraid that sometimes there's stuff
19 being sprayed to make sure that there isn't bugs, either
20 beforehand or during transport.

21 And then also for herbicide residue. You can plant
22 non-GMO, and it'll show non-GMO, but you can put a lot of
23 sprays on that to keep the weeds out.

24 BOARD MEMBER LEWIS: Thank you very much.

25 CHAIR SMITH: Thanks so much for your comments,

1 Steve.

2 Okay. I think we do have Mark Smith with us.

3 Mark, are you there? You're here. Great. State
4 your name and affiliation, and then you can get started.

5 Unmuted, yeah. Hold on one second. We can't hear you.

6 MR. SMITH: How about now?

7 CHAIR SMITH: We got you.

8 MR. SMITH: Okay. My name is Mark Smith. I am a
9 producer, a livestock producer with Montana Organic Producer
10 Co-op, and I just appreciate the chance to be able to give this
11 comment, and I wanted to comment today on the importance of the
12 Board supporting more and better ways of educating the public
13 on what organic is and what organic isn't.

14 For years now -- and, of course, I've been certified
15 now I think for 17 years, my wife and I -- and we continually
16 see the confusion at the consumer level where natural was as
17 good as organic, it's not as good as organic, what organic
18 actually is. And so just to make a comment to encourage that
19 we would enforce this and -- would not enforce but would
20 support this education program on what organic is.

21 And I had an example I wanted to show everybody.
22 Even organic producers seem to be a little confused. And I
23 brought a prop here. This is organic sour cream, and I'm just
24 covering the brand name. And that's good. That's organic sour
25 cream. But this particular producer then seems that he wants

1 to be able to say it's beyond organic right on the same
2 container.

3 And that's the kind of thing that an educated public
4 -- this person that's making the sour cream, they wouldn't feel
5 compelled to say beyond organic. If there was a substantial
6 understanding of what organic is, it's the amount of
7 regulation, the amount of rules, the elimination of all the
8 toxins, poisons, all the things you know that you guys govern
9 and that we're subject to.

10 I just would like to point this out because I think
11 that there's a substantial amount of confusion in the
12 marketplace, and so a thorough and robust program of educating
13 consumers of what organic is and what it isn't.

14 I run into it all the time when I'm selling beef.
15 You know, well, what makes you different? Well, there's tons
16 and tons of things, and I can point out the things that these
17 people that say, well, I'm as good as organic do. For example,
18 the mineral they feed. For example, how are they doing their
19 weeds? Those kinds of things destroy that I'm as good as
20 organic.

21 But if consumers actually knew what it meant, it
22 wouldn't be such an issue. So please support a better, more
23 robust, thorough marketing campaign to educate people better.
24 Thanks.

25 CHAIR SMITH: Thanks for your comments, Mark. It

1 looks like you have a question from Jerry.

2 Jerry, please go ahead.

3 BOARD MEMBER D'AMORE: Yeah, Mark. Thanks a lot. We have
4 an internal rule here that we're not supposed to comment to
5 commenters, but I'm going to break it, and thank you very much
6 for those comments. That's all I --

7 MR. SMITH: Thank you.

8 BOARD MEMBER D'AMORE: Yes, sir.

9 CHAIR SMITH: Go ahead, Dilip.

10 BOARD MEMBER NANDWANI: Mark, thanks for your
11 comments. I wanted to just share, and that my question is, as
12 you know that a lot of land grant universities and institutions
13 around the U.S., they are offering a lot of courses, and
14 extension also conducting a lot of workshops and educating
15 organic, transitional, and all other stakeholders through
16 various forms of, you know, to convey the message what is
17 organic, or tell the difference and educate them.

18 My quick question is that any thoughts you have what
19 other forms than -- traditionally what they are doing or what
20 we are doing in education is teaching courses, the workshops,
21 the media, the videos, the fact sheets, and lots of other
22 forms. There is information out there. Any thoughts you have
23 other than all of these conventional ways what we are educating
24 so that, you know, we can keep in mind? Thank you.

25 MR. SMITH: Well, I'm not trying to say that there's

1 an absolute failure by no means. In fact, being here in
2 Montana, Montana State University over here in Bozeman, it's
3 got a whole four-year degree on this subject matter, and they
4 have a robust, robust thing.

5 So we're working from the ground up in that way. And
6 the programs that you mentioned are helpful. I would just urge
7 that perhaps we could double the effort, double the amount that
8 is out there because, you know, I just run into it. I've run
9 into it all my organic career, which is pretty substantially
10 long.

11 BOARD MEMBER NANDWANI: Totally I agree with your
12 thoughts because many pockets in the U.S., especially in the
13 rural areas where these programs are not able to reach,
14 definitely there is a -- you know, more kind of education is
15 needed, what is organic versus non-organic. So thank you for
16 your comment again. I appreciate it.

17 MR. SMITH: Yeah. And, you know, it's generally, the
18 general population as a whole. We have a thing here in
19 Billings, Montana, they have a home show, and we pioneered --
20 actually brought our meat in there 18 years ago, was the first
21 meat producer to actually offer at the home show our product.
22 It was pretty effective. But since then, it seems like that
23 there's still been this cloud of confusion that comes in over
24 why is natural not just as good as organic, I guess. So thank
25 you very much.

1 BOARD MEMBER NANDWANI: Thank you.

2 CHAIR SMITH: Nate, please go ahead.

3 BOARD MEMBER POWELL-PALM: Thank you so much, Mark.
4 I just really want to highlight that I want to see more props
5 because that was absolutely fantastic to be seeing sort of the
6 messaging that's out there in the world. That's just great.

7 When you're thinking of talking to your consumers,
8 what are those main hooks that -- once you get that
9 conversation going, once you explain what organic is -- what do
10 you see as being the thing that excites them the most about
11 organic?

12 MR. SMITH: I really believe that it's probably
13 twofold, mostly. I think clean, free of all pesticides,
14 herbicides, parasiticides, fungicides, all the "ides," all the
15 poison, right? It's clean.

16 And then secondly, hormones, right? Because many,
17 many of my customers have children, and they're concerned about
18 this ridiculous 7, 8, 9, 10-year-old onset of puberty. And
19 I've watched over the last 18 years, I've seen, you know,
20 children grow up from very young to adults, and it's very
21 satisfying to see them year after year. So those two things,
22 clean and hormones, right?

23 BOARD MEMBER POWELL-PALM: That may be the campaign
24 right there.

25 MR. SMITH: I mentioned before, I mean because those

1 natural guys can say it's just as good as organic, but they
2 happen to slip the old growth hormone in as a calf, right? All
3 those kinds of things. Just as good as natural, but their
4 mineral supplement is made with the -- what I want to say, the
5 residue from sugar beet factories, and they put it in as a base
6 to make it sweet for the cows. Well, sugar beet factory's GMO
7 sugar beets, and it's the base. Or they have no explanation
8 for how they treat their weeds other than to spray them. So
9 clean and hormone really is really the big two, I would say.

10 BOARD MEMBER POWELL-PALM: Really appreciate you
11 giving comments today. Thank you.

12 CHAIR SMITH: Jerry, you got another one?

13 BOARD MEMBER D'AMORE: Please, if you don't mind.

14 CHAIR SMITH: Go ahead.

15 BOARD MEMBER D'AMORE: Mark, I'd like to take you back
16 to your presentation, and remind us all that what you did was
17 not show us a confused consumer. You showed us a producer
18 confusing consumers.

19 And I would suggest to this panel that that's the
20 first step is cleaning up our own house, having all of us in
21 this greater organic community speak with the same perspective
22 and the same voice if possible, and then I think the consumer
23 will fall in line when they hear a consistent message from all
24 of us. Thank you.

25 MR. SMITH: Yeah, I think the only thing that is on

1 this beyond organic is that his cows he says are all grass-fed,
2 and that would be the only thing that might be considered
3 beyond organic. But, gee, I'm an organic 100 percent grass-fed
4 farmer too, but I don't need to be able to say I'm beyond
5 organic anyway because it's all there. The program's all
6 there, and I appreciate that.

7 CHAIR SMITH: Go ahead, Franklin.

8 BOARD MEMBER QUARCOO: I just have a quick comment
9 about these different terminologies. I did receive a call
10 about a week -- or a little bit more than a week ago, and the
11 person said I just want to know the relationship between
12 sustainable agriculture, organic, regenerative, and climate
13 smart. It was an interesting discussion. So it's like the
14 person was asking how are these related?

15 So it looks like we have to get our terminologies
16 straight and let people know what is what because there seems
17 to be confusion on all sides. That's all I wanted to say.

18 MR. SMITH: Wow, Franklin, that's fantastic, because
19 organic is sustainable. We invented sustainable, and now it's
20 starting to be drafted just like they went with natural years
21 and years and years ago is just as good. But, good heavens, we
22 have to monitor and treat our ecosystems and do everything we
23 can think of possible to make sure that we're being
24 responsible, sustainable. You put the adjective on it, and
25 we're doing it, and the organic program's doing that. So going

1 back to a thorough and redoubled effort of what organic is
2 would be very much appreciated.

3 CHAIR SMITH: Okay. Wonderful. I also have a quick
4 question for you. Mark, are you aware that the National
5 Organic Program recently launched a toolkit aimed specifically
6 for consumers and retailers. And Franklin, who was just up
7 there, and Nate, their backgrounds are part of the toolkit but
8 there's lots of other things in there. So were you aware that
9 they launched sort of an education campaign that's available?

10 MR. SMITH: You know, I just have to be honest,
11 because I can't do anything else. I saw it attached to an
12 email. I didn't open it.

13 CHAIR SMITH: Okay. Great.

14 MR. SMITH: So I was aware. I was aware of it, but I
15 didn't open it.

16 CHAIR SMITH: I know. Good. Well, I'm going to drop
17 a link in the chat for everybody, and spread the word because,
18 you know, I don't know how many -- we have 112 people on the call.
19 So tell a friend to tell a friend, and then, you know, it's
20 going to spread like wildfire, hopefully.

21 MR. SMITH: See, that -- hearing that, that sparked
22 me just now. I can get that in the hands of every one of my
23 80-some beef customers to help them to tell their friends. And
24 if that toolkit -- and I'm sure it is, I haven't reviewed it --
25 but my beef customers like to share. I give them an incentive

1 if they refer a customer too. If they sell a whole cow for me,
2 I give them a \$400 credit. So I do meaningful amounts, and
3 they do meaningful amounts for me. But the point is, is that
4 that toolkit could be really handy, so thank you, Kyla.

5 CHAIR SMITH: Yep, you bet. I dropped a link in the
6 chat. So yes, appreciate you spreading the word. I'm just
7 going to do a quick --

8 Thanks so much for your time, Mark.

9 I'm going to do a quick circle back around just to
10 make sure we don't have anybody from the morning. Then we're
11 going to take a 15-minute break. We're behind. I'm not
12 exactly sure how far behind we are. I'm going to try to do
13 some quick math in my head. But do we have John Rosenow?

14 (No response.)

15 CHAIR SMITH: Joseph Kibowatt?

16 (No response.)

17 CHAIR SMITH: Judy Osowitz?

18 (No response.)

19 Okay. It is 1:20 on my time. So we're going to come
20 back at 35, which means we're 30 minutes behind. So we'll be
21 back at 35, and enjoy your break.

22 Oh, and, Jared, thanks so much, or Andrea, for
23 putting up the slide. These are who's coming up next. Jess
24 Alger, Mark Holoubek, and Lisa Wade.

25 Okay. See you guys soon.

1 (Recessed at 1:20 p.m.; reconvened at 1:35 p.m.)

2 CHAIR SMITH: Okay. Next up we have Jess Alger, then
3 Mark Holoubek, then Lisa Wade

4 Do we have Jess?

5 MS. ARSENAULT: It looks like I am not finding Jess.
6 And it indicates Andrea signed him up.

7 CHAIR SMITH: Jess, if you're on the phone, you may
8 need to try star six to unmute yourself.

9 MS. HOLM: I don't believe Jess is here.

10 CHAIR SMITH: Okay. Thanks, Andrea.
11 Mark Holoubek, are you with us?

12 MR. HOLOUBEK: All right. Mark's here.

13 CHAIR SMITH: Wonderful. State your name and
14 affiliation, and then you can get --

15 MR. HOLOUBEK: Mark Holoubek. I live in Butler
16 County, Nebraska, west of David City. I am a farmer, I'm a
17 certified crop advisor, a seed salesman, and a cow-calf
18 producer.

19 My comments basically center around the fact that the
20 row crop organic producers that I work with in the Midwest and
21 High Plains are under duress. I sell organic and non-GMO seed
22 in eight states, from New Mexico, Texas, up to South Dakota, as
23 far east as Illinois, west to Colorado.

24 Interestingly enough, this year I've actually lost
25 growers in three of those states. In fact, I just got off the

1 phone with a customer that testified on Tuesday on this
2 program, and he just canceled on the typical units of organic
3 seed. I had three growers cancel last Thursday on the same
4 day, and I talked to my grower in New Mexico today, and he lost
5 his silage contract to his organic dairy just last week as
6 well. So to put it in a nutshell, things are tough.

7 I grew up in the -- before any of you were probably
8 born -- I went to college when things were good, and it was not
9 2012, it was 1977, and started farming in the 80s. And so are
10 things that bad? No. Are they tough? Yes. I think if we can
11 make them better through policy change, that's awesome.

12 I've listened to a bunch of your speakers and agree.
13 A level playing field is what we're after, and I certainly as a
14 perspective as a supplier of organic seed would share that.

15 So my perspective is a little different. I can say
16 that the growers that I work with who are organic growers are
17 some of the very best growers that I work with. 30 percent of
18 my sales are organic and non-GMO. In fact, I was an organic
19 grower a year ago, and I did something unique. I no-tilled
20 soybeans, it worked, but with the drought and the pricing, I
21 sprayed the field around it. I'm not one of you anymore as far
22 as a grower.

23 My background, just to give you perspective, is I was
24 actually an executive director of the Nebraska Soybean Board in
25 1996, and so I want to say thank you to all of you. I know how

1 much time it takes to serve on the Board, and I appreciate the
2 efforts, what you're doing for your fellow growers. So thank
3 you for that.

4 I actually worked with Pioneer in a satellite mapping
5 business with Boeing Aerospace as well, and a dot-com with John
6 Deere in the late 90s, and the dot-com thing blew all those up,
7 so I got into the seed business. I've been there for 20 years.
8 And I can tell you that it's fun to work with organic people.
9 We have all kinds of seed available because the sales are less
10 this year. You know, it's a great business, and I applaud you
11 for your efforts to try to support that industry. That's all I
12 have.

13 CHAIR SMITH: Thanks so much, Mark, and it looks like
14 you have a question here from Kim.

15 Kim, please go ahead.

16 BOARD MEMBER HUSEMAN: Hi, Mark. Thank you for your
17 comments and your perspective. It's really appreciated.

18 My comments or question to you centers around your
19 outlets and the demand side for organic products, and what
20 you're hearing from the people that you supply seed for and
21 just your knowledge just as a producer as well. Have you seen
22 any changes in the people that you're selling to or the demand
23 side of the market?

24 MR. HOLOUBEK: In a general sense, my guys are having
25 trouble getting paid, and they're having trouble paying for

1 their seed because they're not getting paid. I mean I've got
2 guys that are carrying organic dairies for months at a time,
3 taking contractual payments. You know, they haven't gone to
4 court yet but there's been issues. Of course, on the warehouse
5 side for the grain, we've had some people go out of business in
6 this part of the country. We have some people who are very
7 reputable. We're finding that it's just tougher to get paid.
8 Business is slow.

9 Like I said, having survived the crash of the 80s,
10 which none of you can appreciate, it's not that bad. In fact,
11 the bank in Davis City was the first one to fail in Nebraska in
12 1985. 219 people went out of business that day, and only 141
13 ever farmed again. Not that bad, but I think it's probably
14 closer than people want to realize. Things are going to be
15 tough this year. I think people are going to come up real
16 short.

17 BOARD MEMBER HUSEMAN: Thanks, Mark.

18 CHAIR SMITH: Amy, please go ahead.

19 VICE CHAIR BRUCH: Sure. Mark, thank you for joining
20 us today. I wish better news is ahead for you. I apologize
21 for what you're going through. That's really a sad situation.

22 I wanted to just jump into a new line item. You
23 mentioned about organic seed, and you have tons available
24 still. Can you talk about the viability and performance of
25 organic seed? It's something that you've sold for quite a

1 while, and just yield capacity and capability, I'd love to hear
2 more about that from your perspective.

3 MR. HOLOUBEK: Yeah, I won't take too much time.
4 Bottom line is it's about the genetics. Our company is based
5 in Eastern Nebraska, and we are unique because we're licensed
6 with every supplier of elite seed in the world. And so we've
7 also developed our own proprietary line, and we're able to
8 combine genetics and make a product that has actually worked,
9 bred for this High Plains area.

10 And so to answer your question in a nutshell, I've
11 got organic producers growing 212 and 214 field-average fields
12 of organic corn using our genetics. So elite genetics and
13 allowing -- we've been very aggressive to get elite genetics
14 without the traits in them, and so that's given us a neat
15 opportunity. It's partly why I have customers in so many
16 states, not as many as I used to, but we're hanging in there.

17 So the genetic side is there if people want to work
18 with it. Our soybeans as well. We've got non-GMO and organic
19 soybeans that are really up to snuff, and they compete with
20 elite genetics.

21 VICE CHAIR BRUCH: Thank you, Mark.

22 CHAIR SMITH: Thanks so much for being with us today,
23 Mark.

24 MR. HOLOUBEK: Oh, my pleasure. Continue to do what
25 you do. I appreciate it.

1 CHAIR SMITH: Thanks.

2 Okay. Up next is Lisa Wade. I'm not sure if we have
3 Lisa on the line with us. Lisa, if you are there and you're on
4 the phone, you can try star six.

5 Otherwise, we'll move to Lynn Clarkson. After Lynn,
6 it's John Shepard. After John is Marni Karlin.

7 MR. CLARKSON: Okay. Can you hear me?

8 CHAIR SMITH: I sure can. State your name and
9 affiliation, and then you can get started.

10 MR. CLARKSON: Thank you. My name is Lynn Clarkson.
11 I'm here today as the CEO of Clarkson Grain Company. We're
12 based in Illinois, been certified since the 1990s. We buy,
13 condition, and process organic corn and soy for making organic
14 foods and ingredients. We serve clients, domestic and foreign.
15 We have the pleasure of seeing our organic ingredients in
16 grocery stores throughout the U.S.

17 We used to import crops to supplement domestic
18 supply. Today we don't. Why not? Testing for residues, we
19 find pesticides not legal in the United States, not legal
20 anywhere but Brazil, and not legal anywhere in the world. With
21 U.S. crushers now handling mostly foreign soy beans, it has
22 become difficult for us to find clean, pesticide-free oil
23 domestically.

24 My confidence in the integrity of U.S.-grown crops is
25 90 percent. For imported crops, less than 50 percent. We have

1 purchased from Argentina, Brazil, Uruguay, China, India, and
2 Ukraine. We quit because we could not trust the integrity of
3 our foreign supply chains. We now buy crops only from the
4 United States and Canada.

5 Tutoring organic certification is easy. Proving it's
6 difficult. The U.S. government offers institutional support
7 for organic integrity. These critically include commercial
8 codes and a functioning judicial system that occasionally
9 apprehends and punishes parties guilty of fraud.

10 Most organic imports come from countries that lack
11 institutional support and seemingly lack interest in stopping
12 fraud. It's critical to punish people for cheating to
13 discourage cheating, but in the countries supplying most of our
14 organic products, I do not see fraud being punished.

15 Randy Constant is/was the poster boy for dramatic
16 domestic fraud. Only after 20 years and perhaps \$200 million
17 in fraud was he apprehended and punished. Had Randy been a
18 foreign supplier, I think he'd still be thriving, expanding
19 with the thought that the worst penalty might be loss of
20 organic certification. He would feel free of institutional
21 constraint, free to continue committing fraud, intimidate
22 neighbors into silence, bribe or threaten inspectors,
23 certifiers, and authorities. Why do I think that? Because
24 with 30 years' experience, I know Randy's behavioral brothers
25 in those countries. They cheat without concern for punishment.

1 I recommend that we test all crops and ingredients
2 coming to the United States labeled with organic for pesticide
3 residue, flag shipments exceeding tolerances and remove them
4 from the organic chain of commerce. Two, introduce a tolerance
5 level for adventitious GMO presence. Shipments exceeding that
6 tolerance should get extra attention. Three, regard individual
7 suppliers as part of the environment in which they live. If
8 their nation state shows no enthusiasm for eliminating organic
9 fraud, remove certification from suppliers from that country.

10 As suppliers and buyers cheat without punishment,
11 organic fraud is getting worse, not better. As a consequence,
12 legitimate farmers and processors lose market and go out of
13 business. Conventional buyers provide conventional stuff,
14 putting behind organic certificates. The pain is real. Thank
15 you.

16 CHAIR SMITH: Thanks for your comments, Lynn.

17 And it looks like you have a question from Nate.

18 BOARD MEMBER POWELL-PALM: Lynn, I just wanted to say
19 thank you so much for your comments. We hear a lot from
20 farmers expressing this concern about the legitimacy of
21 imported organic feedstuffs, and it is rare to hear a business
22 like yours making that step to say you're going to support
23 American organic farmers and integrity at the same time by
24 focusing your supply chain on domestic opportunities. So thank
25 you so much.

1 When you think about the ability of American farmers
2 to meet the needs of your demand, do you think we can do it?
3 Can we grow enough feedstuffs here to meet the needs of our
4 animal industry and our milling industries?

5 MR. CLARKSON: Absolutely, no question. U.S.
6 producers can easily meet it, if not overwhelm it, and I would
7 love to see that happen. The transition phase puts a lot of
8 people off. If there were a transition program for organic, it
9 would be easier to attract new people.

10 In the comments you heard earlier today about the
11 bouncing around, the inconsistency in prices, the comments on
12 the range of prices have been somewhat wrong, but in general
13 they're right on the money. Soybean prices were \$20 and went
14 above \$50 for about a month and a half and then dropped back
15 down today to \$18 to \$20. It is really hard for a farmer to
16 plan his budget and make his investments without knowing what a
17 reliable range of prices would be. And we're talking a 200
18 percent variation in price. That's extraordinarily difficult.

19 Yields, we see farmers with organic corn yields above
20 200 bushels an acre on a regular basis. I'm not saying that's
21 average. I'm saying that's what you find in some places. We
22 see organic farmers with 60 bushel an acre soybean yields, so I
23 think the average for our country is probably just under 40.
24 But we have such a tremendous range of productive power in the
25 United States and so many natural advantages. There's no

1 question that the answer to your question to me is, yes, we
2 can.

3 BOARD MEMBER POWELL-PALM: Really appreciate that.
4 Thank you so much.

5 MR. CLARKSON: You're welcome.

6 CHAIR SMITH: Kim, please go ahead.

7 BOARD MEMBER HUSEMAN: Thank you, Lynn, for your
8 comments today. It's really, as Nate pointed out, important to
9 hear your lens in the market space.

10 I want to focus a little bit about the logistical
11 infrastructure in the organic product movement. Can you weigh
12 in on your thoughts about moving organic grains within the
13 U.S., and if you see any constraints with that today?

14 MR. CLARKSON: Sure. There are some structural
15 issues here. One is most of the grain is raised between the
16 Alleghenies and the Rockies, and most of our population lives
17 outside, on the east of the Alleghenies and west of the
18 Rockies.

19 The cost of moving material by land from the Midwest
20 to the coasts is almost identical to the cost of moving by
21 water from Ukraine, Turkey, Nigeria, Togo, to the United
22 States. So there is a difficulty in matching the logistics
23 costs that others have once they get to water.

24 Unfortunately, we're a country with tremendous
25 coastlines that we don't use very well to serve ourself. So

1 rail would be helpful, but very few facilities are set up to
2 use rail, and so most farmers are tied into having to use
3 trucks, and the cost of truck transportation from the Midwest
4 to the West is dramatic and very high.

5 BOARD MEMBER HUSEMAN: Thank you. I really
6 appreciate that. Being in the industry and understanding how
7 rail and truck movements tend to flow, I hear that loud and
8 clear. So thank you very much for entertaining my question.

9 MR. CLARKSON: You're very welcome.

10 CHAIR SMITH: Thanks so much for taking the time to
11 be with us today, Lynn.

12 MR. CLARKSON: Thank you, folks, for doing your jobs.
13 I appreciate it.

14 CHAIR SMITH: Okay. It looks like Lisa may be back
15 on the line. Do we have Lisa?

16 So if we have her, we'll go Lisa, then John Shepherd,
17 then Marni.

18 MS. HOLM: We're watching for Lisa, but we don't see
19 her yet.

20 CHAIR SMITH: Okay. I'll keep circling back. So
21 back to John.

22 John Shepherd, are you there? You guys are keeping
23 me on my toes today. Okay. State your name and affiliation,
24 and then you can get started.

25 MS. ARSENAULT: John, you are still muted. Actually,

1 John, we can't hear you. You don't show an unmuted link, so it
2 might be on your end. Nope.

3 CHAIR SMITH: Still not. John, on your Zoom screen,
4 there's the audio-like icon on your toolbar, and there's like
5 the little caret. If you hit that, then the little thing will
6 pop up, and sometimes you have to switch your like microphone
7 setting.

8 (No response.)

9 CHAIR SMITH: No. Can't -- oh, you're going to try
10 to dial in on the phone? Okay. We'll come back to you. Okay.
11 Thanks so much. Sorry about that.

12 All righty. Marni, are you there, and are you ready?

13 MS. KARLIN: I am here and ready. Are you ready,
14 Kyla?

15 CHAIR SMITH: I am ready.

16 MS. KARLIN: Awesome. Thanks. Hi, I'm Marni Karlin.
17 I'm a consultant here today representing the Accredited
18 Certifiers Association. Today I'm going to comment on
19 considering certifier perspectives, residue testing, and
20 comments to the open docket.

21 First, considering certifier perspectives. As my
22 colleague, Elly, noted on Tuesday, certifiers are experiencing
23 stress and fatigue as the complexity of certification
24 increases, creating continued intense pressure. ACA members
25 are fully committed to organic integrity and our role in

1 service of that integrity.

2 While Elly noted our commitment to building capacity,
3 I'd like to note another important piece of this puzzle.
4 Ensuring that any new regulatory or legislative mandates that
5 might add to the complexity and pressure of certification are
6 developed with the benefit of certifier's perspectives.

7 We often talk about the public-private partnership
8 and the importance of farmers in trade being at the table to
9 ensure that regulators and legislators consider the real-world
10 impact of policy change. We also need to be sure certifiers
11 are at that table, bringing their real-world perspective.
12 Without the certifier voice represented from the beginning, we
13 risk creating mandates that are not feasible or unnecessarily
14 place more stress and pressure on the system.

15 Of course, this is really a call-out to ourselves,
16 and it's true that we are already very ably represented here on
17 the Board and are proud of our strong partnership and working
18 relationship with the NOP. The ACA commits to building on
19 these strengths in engagement with other policymakers and
20 stakeholders. Together we must think critically about moving
21 further toward a risk-based certification system that protects
22 organic integrity while being appropriate to the needs and risk
23 factors of all certified operations.

24 Residue testing. We appreciate the expertise the
25 CACS subcommittee has put into its work on residue testing. An

1 updated testing program can help certifiers verify compliance
2 and deter fraud. If something isn't truly organic, it should
3 not be in the organic supply chain.

4 Such a testing program must also be feasible.
5 Particularly when certifiers are implementing the largest
6 update to the organic regulations in 20 years,, we must be
7 mindful of human capital and other resource constraints and use
8 a risk-based lens for compliance verification. Certifiers'
9 perspectives must be considered in development of any updated
10 residue testing program. We are critical to verifying
11 compliance and best understand pressures on the system that
12 must be considered.

13 We respectfully request that discussion of this topic
14 continue in the fall to allow time for certifiers' perspectives
15 to be included in the risk-based approach to residue testing.
16 This would also allow the work to be informed by the sector's
17 experience in implementing some of the new tools from SOE such
18 as supply chain traceability audits and other tools designed to
19 remove fraud from organic supply chains so we can see what's
20 working and where further checks may be needed to protect
21 integrity.

22 And finally, comments to the open docket. As you
23 know, the short window for comments in advance of this meeting
24 fell immediately after the SOE implementation deadline, and ACA
25 members were understandably fully focused on SOE impacts at

1 that time. We commit to engaging with some of the important
2 topics on this meeting's agenda such as updates to the
3 template, and submitting comments to the open docket so the
4 Board can continue its important work. Thank you for your
5 service and this opportunity to comment.

6 CHAIR SMITH: Yeah. Okay. Thanks, Marni. It looks
7 like we have a question from Amy.

8 VICE CHAIR BRUCH: Marni, thank you for joining us
9 and representing certifiers and their voice. I have a
10 question. You mentioned a few times risk-based system when
11 we're looking at applying residue testing, and I think that
12 that's great.

13 When we are looking at written comments this go
14 around, especially from inspectors, they do talk about risk as
15 well, and they're highlighting large vessels, imports. When we
16 hear from our oral comments right now, we're hearing a lot of
17 comments that the folks in the handling space are doing their
18 own testing and seeing these residues.

19 How do we execute the plan to get more imports
20 tested, one, based on a risk-based system, but two, I think the
21 risks are there and even we're hearing mass balances for a
22 while out of these countries, you know, what they have
23 certified acres aren't matching their exports. How do we move
24 the needle to get this in motion because I think risks are
25 definitely clear and identified, and now what's the next step

1 to get this executed?

2 MS. KARLIN: Yeah, that's a great question. Thank
3 you, Amy. So I think a next step is letting SOE play out a
4 little bit. That's not the only next step, so I'm going to say
5 more, but one piece, because I know that's not going to satisfy
6 you, and it's not enough.

7 One piece, though, is SOE created so many new
8 enforcement tools and closed some loopholes, and we've had it
9 in effect for five weeks, I think, at this point. And so
10 getting a chance to see how that works, how that closes the
11 loopholes, how that requires additional auditing, requires
12 additional handlers and importers to be certified, brings more
13 folks into that fold of verification, I think is a critical
14 piece.

15 And I hear you, and I've heard the comments that
16 that's not enough, right? And I appreciate that, and I speak
17 representing the certifiers. I'm not a farmer, so I've been
18 enjoying -- enjoying is the wrong word -- but I've been
19 appreciating getting the input and the perspective of farmers
20 on calls like this.

21 So I think there are some other steps. I think we
22 can think creatively about what authority USDA already has to
23 look at testing as a tool when risk is understood. I think
24 that we can work -- certifiers and inspectors can work together
25 to think about, okay, what can we do? Where do we see risk?

1 Do we need to communicate with each other better certifier to
2 certifier about risk that we're seeing, which we're going to be
3 doing in the context of those supply chain traceability audits.

4 I think there is room for lots to be done. I think
5 that it's important to think about risk and to recognize that
6 risk may exist in imports. It may also exist in domestic, and
7 so we want to just understand what those risk factors are and
8 be testing against those risk factors, and then to understand
9 certifier pressures and workloads and how we're going to
10 feasibly do that.

11 I don't mean that we can't do it, but I mean we need
12 to think seriously about how many people we have, how many
13 testing facilities we have, all of these things, and make sure
14 we build a system that we can actually implement. Does that
15 help at all?

16 VICE CHAIR BRUCH: Yeah, that's helpful. Thank you.
17 And one thing about working groups, there was some comments
18 about working groups from other members outside of the
19 certification body that were interested in helping to inform
20 instruction and update guidance and best practices. Is that
21 something ACA would be open to having inspectors, members from
22 the private sector and industry involved in these conversations
23 as well as we're looking at best practices for residue testing?

24 MS. KARLIN: Well, I think it's not on us to tell you
25 all how you set up your working groups, but I will tell you how

1 ACA sets up our working groups. So our working groups already
2 do include a lot of those perspectives. We almost always, if
3 not always -- I guess I can't be certain -- include inspector
4 voices, and we have been growing our associate membership which
5 includes other folks in the trade and other relevant
6 stakeholders who have been involved.

7 So from the perspective of the ACA working groups, we
8 are certainly open. And from the perspective of the NOSB
9 working group, we would just love to be part of that, and you
10 all would think about how that gets set up.

11 CHAIR SMITH: I just want to clarify that in order to
12 be on an ACA working group, you do need to be a member of ACA,
13 correct, Marni?

14 MS. KARLIN: That's right. Thank you. And we have
15 an associate membership that is such that you don't have to be
16 a certifier. You can be a stakeholder in the industry.

17 CHAIR SMITH: Kim, please go ahead.

18 MS. KARLIN: Thank you.

19 BOARD MEMBER HUSEMAN: Thank you, Marni, for your
20 comments. I find them very insightful and always appreciate
21 your lens.

22 My question -- and forgive my metaphor and putting
23 you on the spot here a little bit -- but, say, SOE is the
24 vessel and we're trying to turn it with an egg beater. Always
25 take some time. What in your mind would be an effective amount

1 of time to start seeing the SOE implementation create change in
2 the market space we're in today?

3 MS. KARLIN: That is a great question. And I'm going
4 to attempt to answer it, but I'm also going to say that I'm not
5 the expert on this, right? I work with certifiers, but I'm not
6 a certifier. And so when I think about the incredible efforts
7 that the certifiers have put in over the last year plus on
8 building systems to implement SOE, and then I think about,
9 okay, well, how does that all play out, I'm wary of putting any
10 clear time frame on it.

11 BOARD MEMBER HUSEMAN: I'm sorry to put you on the
12 spot. It's just, yeah.

13 MS. KARLIN: No, and I appreciate -- I mean I
14 understand the question, and that's perhaps why I think that
15 it's a both/and answer, right? We're going to let SOE play
16 out, and we're going to see what other tools we have to do
17 other things at the same time because it is possible that to
18 really see the impact of SOE it could take some time. It could
19 take a cycle of inspections. And I see Kyla nodding her head
20 as a certifier, so I think I'm on the right track here.

21 And so that is why I think that it's not wrong --
22 that my answer is not so let's just wait and see how SOE does,
23 we'll talk again in a few years. That's a ridiculous answer,
24 right? I think the right answer is let's let that play out.
25 Let's see what our other tools are.

1 SOE gives certifiers a lot of tools to implement in a
2 risk-based way, and so perhaps we need to work together to talk
3 through what that looks like and what that should look like.

4 BOARD MEMBER HUSEMAN: Thank you, Marni. And if I
5 see you in Milwaukee, I owe you a drink.

6 MS. KARLIN: You don't owe me a drink. And you might
7 see me in Milwaukee, I would love to see you, and you don't owe
8 me a drink, it's fine.

9 BOARD MEMBER HUSEMAN: Well, I do appreciate your
10 lens, though, and I think this is a topic that just -- I
11 appreciate you giving a stab at that, too. I don't know if
12 there is an answer, but I really appreciate your lens of it so
13 much. Thanks.

14 MS. KARLIN: Thank you. I appreciated your metaphor.

15 CHAIR SMITH: Mindee, just one sec before you jump
16 in.

17 I agree, like at least a year for inspection cycle,
18 and then there's also the certifier auditing cycles. And so if
19 certifiers are not implementing SOE in an effective manner,
20 then there will be fallout from that. And accreditation cycles
21 are all like a little bit different, but we should start to see
22 some impact, I would think, within a year's time of
23 implementation. That gives one, you know, and then
24 accreditations will be happening this year, accreditation
25 audits. So anyway, that's my hot take.

1 Go ahead, Mindee.

2 MS. KARLIN: And I guess, actually, Mindee, if I
3 could jump in with one more quick thing. I apologize.

4 In addition to what Kyla just said, you know, I think
5 that as I understand it USDA is already -- or NOP, I should say
6 -- is already sort of asking certifiers for information to
7 demonstrate compliance and to demonstrate that they have
8 systems in place, and so I think that those assessments are in
9 progress. So I think that that year that Kyla is thinking
10 about, the time has started. And it will take some time.

11 CHAIR SMITH: Mindee, please go ahead.

12 BOARD MEMBER JEFFERY: Thank you so much, Marni, and
13 thank you to ACA and all the certifiers. As a retailer who
14 spent 15 years explaining organic to customers and advocating
15 for great messaging to brands, the presence of the ACA has
16 always been a really helpful tool for me to say, and there's
17 not only certification and NOP, there's also ACA helping on
18 consistency issues. And so I have always been a fan of the
19 work of ACA in that it helps me convince customers and brands
20 of the great work that organic is doing when they have
21 questions.

22 My question for you is, when ACA does do a working
23 group, are they often ongoing working groups? Are they
24 specific working groups? And is there a timeframe for how long
25 it takes ACA to work internally with your members and come back

1 with information?

2 MS. KARLIN: That's a great question, and I
3 appreciate it. And I think the answer is, it depends, and so
4 I'll flesh that out a bit.

5 You know, we do have some standing working groups
6 that are ongoing and that sort of deal with ongoing topics.
7 When I think about for example my comment, I think that if we
8 could pull together some thought around the TR review template
9 we'd work together, to me that would not be an ongoing topic,
10 that would be a finite let's get this done. Let's get the
11 right minds in the room who are thinking about this, assess it,
12 pull together some comments and share them so that we can have
13 input in the system in the process.

14 I think, you know, we have been known to be very
15 nimble and agile and move something in as little as six weeks
16 to a couple of months. That takes a push, but I think it's
17 doable. So I guess when I make comments both in writing and
18 orally that we'd love to have the opportunity to have that
19 input, I would do so in a way that respects the process that's
20 being done recognizing that there's a lot of process that's
21 behind us, and so perhaps would find ways to be agile and
22 nimble and responsive if offered that opportunity. Does that
23 answer your question?

24 BOARD MEMBER JEFFERY: Yeah, I totally appreciate all
25 the work that you guys are doing and the pressures and the

1 impact. So just kind of curious about the ACA process, and
2 thank you so much for the feedback and the work that you do.

3 MS. KARLIN: Thank you.

4 CHAIR SMITH: Thanks, Marni. Thanks for being with
5 us today.

6 MS. KARLIN: Thanks guys.

7 CHAIR SMITH: Okay. I'm aware that there are some
8 people who have rejoined. We're going to go back to John. He
9 was having some audio issues. And then for anybody who we
10 called and they were not here, I am going to wait and call them
11 at the end of this next chunk before we take our afternoon
12 break. So that's my plan.

13 The scheduled break was to be at 2:20. We're running
14 a little behind. So we're going to hear from John, and then
15 next up is going to be Matt Nidlinger, and then Garth Kahl.

16 So, John, let's test your mic.

17 (Pause.)

18 CHAIR SMITH: No?

19 MS. HOLM: Hey, John, if you could share the last
20 four of your phone number to the chat, we can find you and ask
21 you to unmute.

22 (Pause.)

23 MS. ARSENAULT: Now I think he is asking you to move
24 to the next speaker.

25 CHAIR SMITH: Okay. Yeah, if you could put the last

1 four digits of your phone number in the chat, then we can,
2 yeah, ask you to unmute, and then you can do the star six. The
3 star six doesn't work until we ask you to unmute.

4 MS. ARSENAULT: Lisa Wade also had audio issues, and
5 that's why, because we couldn't unmute.

6 MR. SHEPPARD: Can you hear me now?

7 CHAIR SMITH: We got you.

8 MR. SHEPPARD: Okay. Good. Thank you. And I'll get
9 started. Good afternoon. I'm John Sheppard, the Director in
10 the domestic trade association, Organic Soybean Processors of
11 America, or OSPA. OSPA advocates for fair and free trade,
12 specifically the advancement of safe, reliable organic
13 livestock feed. I'm also the President of Sheppard Grain
14 Enterprises. Sheppard Grain has produced organic soybean meal
15 for over two decades. Thank you for this opportunity to
16 address the NOSB.

17 Currently, the U.S. organic soybean market is rife
18 with fraud. In January, OSPA contracted with Agromeris to
19 accomplish a mass balance analysis of African exports of
20 organic soybean meal relative to available certified feedstock
21 and production capabilities. The evidence is clear. There is
22 no way all the meal is born of certified organic soybeans. My
23 written submission highlights this effort, and I encourage you
24 to refer to those comments.

25 I prepared two slides to describe a snapshot of

1 today's U.S. organic soybean market. This information is
2 derived from ImportInfo, the U.S. Customs import data reporting
3 subscription. In six weeks, 41,510 metric tons of organic
4 soybean meal was imported into the United States. This is an
5 annual rate of 360,000 metric tons, 70 percent of the current
6 U.S. annual demand of organic soybean meal. 60 percent was
7 imported from Turkish ports originating through the Black Sea
8 region. 35 percent came from Africa.

9 The meal is available to the U.S. market at \$70 to
10 \$90 a metric ton below the cost of producing domestic meal.
11 That equates to nearly a \$2 per bushel reduction of domestic
12 soybean value for domestic crushers to match the importer
13 pricing at the cost of production.

14 The next slide shows bill of lading description
15 examples of imported organic protein. Organic soybean meal is
16 accompanied by the description non-GMO, not treated with
17 pesticides, which of course is innate if truly born of
18 certified organic soybeans.

19 The import market currently has fraud competing
20 against fraud for market share. Organic protein is exported
21 prepaid, ETHC for seller's account. Organic meal is being
22 pushed to the United States and sold on consignment. And why
23 not? The exporting entities return U.S. dollars. The downside
24 risk is merely selling the claimed organic meal as
25 conventional.

1 The current U.S. organic soybean market has devolved
2 below stabilization, and immediate recovery efforts should be
3 made. OPSA supports the requirement for imported organic
4 soybean meal to be laboratory tested for solvents. This could
5 easily be implemented through the USDA and CBP. In addition,
6 an audit of the five largest importers of organic soybean meal
7 from seed to meal will renew consumer confidence in imported
8 supply. Thank you.

9 CHAIR SMITH: Thanks for your comments, John, and for
10 the patience with the tech. It looks like you have a question
11 from Nate.

12 Nate, please go ahead.

13 BOARD MEMBER LEWIS: Thanks, John. You mentioned
14 synthetic solvents being a potential contaminant in, quote-
15 unquote, organic soybean meal from overseas. Do you have
16 information on sort of industry-accepted testing methodologies
17 for detecting those compounds that you could share with the
18 Board?

19 MR. SHEPPARD: I've tested meal from my own account.
20 I've seen tested meal of others. And the solvent residual
21 testing is widely known throughout the United States
22 laboratories and easily accomplished.

23 BOARD MEMBER LEWIS: Okay. Great. Thanks. I think
24 what Amy and I are working on in terms of our testing
25 methodology update would be really helpful for certifiers to

1 have which specific tests at which specific types of
2 laboratories detailed into some guidance documents so that they
3 don't have to just go out and Google how do I do a solvent
4 test? They have some specific guidance. So I think we're just
5 trying to get down to the granular level there, and appreciate
6 your expertise.

7 MR. SHEPPARD: Thank you.

8 CHAIR SMITH: Amy, please go ahead.

9 VICE CHAIR BRUCH: Yeah, John, thanks for joining us
10 today. Thanks for your commitment to integrity in the organic
11 space. Really appreciate that. You mentioned about solvents
12 as a way to detect fraud within soybean meal. Are there other
13 ways comparing conventional soybean meal versus organic soybean
14 meal for types of residue tests we could look at?

15 MR. SHEPPARD: A simple test is analyzing the oil
16 content, the retained oil of organic soybean meal. Mechanical
17 processing is not going to get below 6 percent retained oil,
18 and if organic soybean meal is being peddled below 6 percent,
19 then there's obviously something going on with that.

20 Solvent-extracted meal, on the other hand, could get
21 below 2 percent, 1 percent retained oil, and that's their
22 purpose is to extract all the oil from a conventional solvent-
23 extracted process.

24 VICE CHAIR BRUCH: Thank you. And thanks for
25 submitting the report to the written docket for comments.

1 Really appreciate that information.

2 MR. SHEPPARD: You're welcome.

3 CHAIR SMITH: Thanks so much for your comments, John.

4 Okay. And sorry, I skipped Lisa Wade that was also
5 having some unmute issues earlier. So we're going to go Lisa,
6 then Matt Nidlinger, then Garth Kahl. And thanks again for
7 everybody's patience and, you know, jockeying up and down the
8 list. So do we have Lisa's phone number that we can ask her to
9 unmute, and then we've got to do the star six thing, right?

10 MS. HOLM: Lisa was on, but I don't see her anymore.

11 BOARD MEMBER POWELL-PALM: 5602 I think is the last
12 part of her phone.

13 MS. ARSENAULT: Yeah, it looks like she dropped
14 again. I know she had a short window of time. Sorry, Kyla.
15 Thank you.

16 CHAIR SMITH: Okay. Back to Matt. Matt Nidlinger,
17 are you there? And then we have Garth Kahl, and then Luke
18 Giannforte. And if we get Lisa back on, we'll try to bump her
19 up.

20 So Matt, name and affiliation, and you can get
21 started.

22 MR. NIDLINGER: Awesome. Thanks, Kyla. Can
23 everybody hear me okay? Awesome. Good deal. Good afternoon.
24 My name is Matt Nidlinger. I am the organic grain manager for
25 Consolidated Grain and Barge Company.

1 CGB joined the organic market four years ago and now
2 operates 15 facilities throughout the Midwest where we procure
3 organic grain from local producers into our elevators, and then
4 we distribute out to end users by truck or rail when needed.
5 We primarily focus on the feed grade side of the business but
6 do a little bit with food as well. Much like other commenters,
7 I'm here today to support the need for increased efforts in
8 fraud prevention, primarily through testing of organic grains.

9 So while SOE was a step in the right direction, the
10 next steps that I believe the NOSB should take is increasing
11 the testing of commodities to ensure they are organic and they
12 have preserved that identity as they are handled through the
13 supply chain. For us with CGB, we're testing every load of
14 organic grain for GMO purity before it is accepted into our
15 facilities and into the supply chain. We've found this to be a
16 very cost-effective and time-efficient way to protect our
17 supply chain. I'd encourage the NOSB to increase the GMO
18 testing standard for both domestic and imported commodities.
19 It's a very feasible solution to help out.

20 I also believe that chemical residue testing
21 procedures should be enhanced to prevent fraud from entering
22 the supply chain. In particular, NOP 2610, Instructions for
23 Sampling Procedures, does not standardize testing of any
24 specific frequency from what I can see, but rather leaves it
25 open towards when fraud is suspected.

1 When fraud is suspected, in my opinion, it's too late
2 for taking samples and doing tests. I would encourage the NOSB
3 to adapt a more stringent policy that proactively tests for
4 chemical residues, and make those testing procedures
5 statistically relevant as well. Areas where fraud is suspected
6 can still be scrutinized, but don't let that be our only
7 qualifier for a test.

8 I'd also like to point out that seed genetics and
9 chemicals are changing constantly. New genetics are on the
10 market annually, and that will continue. The NOSB will need to
11 continue to evaluate testing protocols annually to ensure they
12 stay relevant. Another issue that will be coming to the
13 forefront over the next few years will be gene-edited seed.
14 Currently, there is no test for gene-edited seed like there is
15 for GMO.

16 I think these issues are very important to the
17 sustainability of our industry. Testing and verification is
18 critical to maintain the integrity of the label. I appreciate
19 your time and will take any questions that you may have.

20 CHAIR SMITH: Thanks so much, Matt. Any questions
21 for Matt? It looks like yes from Kim.

22 Kim, please go ahead.

23 BOARD MEMBER HUSEMAN: Hi, Matt. I really appreciate
24 your comments and your perspective of the marketplace today.
25 I've asked this question to a few different folks, and I'm

1 going to ask you the same from your lens because I think yours
2 is unique as well. As far as logistics and transportation in
3 the U.S. of moving organic products from the farm to the end
4 user, can you give me your perspective of any bottlenecks or
5 constraints that we face today in the U.S.?

6 MR. NIDLINGER: Sure. Yeah, I appreciate the
7 question, Kim. The organic market is nowhere near as efficient
8 as the generic market today. I think part of the reason that
9 CGB has found value in getting into the marketplace is
10 introducing more local facilities for producers to turn their
11 grain into cash when they want to, and then distributing back
12 out hopefully by more efficient means of transportation too,
13 primarily on rail cars. So seven of the facilities that we
14 have certified to handle organic, seven out of the fifteen are
15 rail facilities. So we're primarily using rail to access the
16 east and west coast and down to Texas as well.

17 I've found that railroads do want additional
18 business. Of course, it comes and goes, right, depending on
19 what the economy is looking like. But they have been very
20 receptive to trying to work with single car business, and we'll
21 try to continue to grow upon that.

22 BOARD MEMBER HUSEMAN: Thank you. I appreciate that,
23 and I hope that the NSFs, the UPs, and the CSXs of the world
24 can bend there a little bit further too in this regard.

25 MR. NIDLINGER: Absolutely. Thank you.

1 CHAIR SMITH: So many acronyms. I have a question
2 for you. You mentioned that your company does GMO testing. Do
3 you test for prohibitive pesticides or solvents that keep
4 getting mentioned here today? Do you do any testing like that?

5 MR. NIDLINGER: So CGB as a whole, we're one of the
6 largest exporters of identity-preserved grains annually, and so
7 primarily non-GMO commodities. And we will do some testing on
8 those shipments as customers require, and that would be done in
9 a lab setting.

10 On the organic side, we have not ventured down that
11 path yet. I think it would be great to do, but for chemical
12 residue testing it's not as feasible to do as GMO testing. GMO
13 testing, you know, I can have a result at our facility within
14 10 minutes of the truck being sampled, whereas chemicals, we
15 can't do that at any facility. You really have to send it off
16 to a lab to get a true test of what's going on.

17 CHAIR SMITH: Thanks so much, Matt. Appreciate you
18 being with us today.

19 Okay. We have now Garth Kahl, then Luke Giannforte,
20 and then Craig Schmidt.

21 Garth, name and affiliation, and then you can get
22 started.

23 MR. KAHL: Yes. My name is Garth Kahl. I wear many
24 organic hats. I'm an organic grower stockman for 30 years, an
25 organic inspector, and a consultant with the Organic Integrity

1 Cooperative Guild. I want to thank you for the opportunity to
2 comment, and as always, thanks to the NOSB members for your
3 service, and the NOP staff, especially Michelle, for your
4 support.

5 You already have my written comments specifically on
6 the CACS discussion documents, residue testing for a global
7 supply chain, and organic food system capacity and constraint.
8 With respect to the former, I would draw your attention to the
9 comments made by IOA.

10 Most importantly, we need new testing screens,
11 particularly for herbicizing crops and synthetic solvent
12 residues in processed animal feed. In this vein, I
13 particularly want to applaud Amy Bruch for her work on that
14 market bill that will require more testing of bulk inputs. Go,
15 Amy.

16 Mainly, I want to talk about the capacity and
17 constraints document and to raise the alarm about the stampede
18 of organic livestock producers who are dropping certification
19 or leaving livestock farming altogether. As anyone who works
20 in organic certification will tell you, the last three years
21 have seen a massive loss of organic dairy producers. The
22 victims of a perfect storm, entrenched monopolistic conditions
23 in the dairy processing market, huge spikes in energy and
24 commodity prices, and labor shortages. Of the handful of
25 organic dairy producers I personally work with, two have

1 surrendered certification in the last two years, and another is
2 desperately trying to sell.

3 The organic beef industry is even more dismal mainly
4 because there really is no price premium for organic grass-fed
5 versus conventional grass-fed beef. In part this stems from
6 consumers not knowing the benefits of organic beef, in addition
7 to potentially fraudulent cattle changing organic price
8 premiums whenever they do arrive.

9 While conventional producers can use cheaper hay,
10 hormones to facilitate breeding, and conventional parasiticides
11 and fly control, organic growers can use none of these. I have
12 personally seen nearly a dozen cow-calf operators who have
13 decided that, quote, organic beef just isn't worth it.

14 We in the realm of organic enforcement have done very
15 little to address this crisis and in many ways have made it
16 worse. In an attempt to address perceived or actual fraud, our
17 response has been a raft of new record-keeping requirements and
18 multiple updates to growers' OSP, in some cases, twice in the
19 same year.

20 The NOP's 2023 livestock memo, the SOE, and the OLPS
21 all hit producers like a hailstorm when they were recovering
22 from the tornado that was the pandemic and inflation.
23 Unfortunately, the NOP guidance and certifiers' interpretation
24 of new standards are becoming increasingly prescriptive and
25 less willing to accommodate the differences between operations.

1 So all in all, the data just sound insensible.

2 Larger operators simply hire nutritionists to
3 document grazing compliance and consultants like me to
4 continually update their OSP documents. Smaller operators
5 mostly suffer, or worse, receive non-compliances for small
6 record-keeping lapses that don't really reflect a breach of
7 organic integrity.

8 Thank you very much. I welcome any questions.

9 CHAIR SMITH: Thanks so much, Garth. You have a
10 question from Amy.

11 Amy, please go ahead.

12 VICE CHAIR BRUCH: Yeah, Garth, thanks for joining us
13 today and submitting your written comments and the oral ones
14 and your commitment to integrity. Really appreciate it.

15 I wanted to just ask you if you could walk us through
16 some of the inspections that you've done at ports of entry with
17 imported products and just how that testing procedure can
18 happen.

19 MR. KAHL: Yeah, great question and very timely. So,
20 you know, ships that are moving bulk products are imminently
21 trackable. So if, for example, an organic importer were to
22 tell their certifier they had an organic bulk ship coming, it's
23 very easy to track that vessel with free apps. You can track
24 that vessel.

25 Once it arrives, the key issue is getting access to

1 the port. Ports are considered kind of like the secure area at
2 an airport, and anybody that works in a port has to have a TWIC
3 card, which is a Transportation Worker Identity Card. Once you
4 have that card, and once you have been authorized by the
5 shipping agent who is contracted by the importer to manage the
6 ship and hire the longshore crews and all of that, you can go
7 to the gate. You can say, I want to go visit the General
8 Hudson that's birthed at Pier 5, and you can walk out there
9 with your hard hat and your high visibility vest.

10 At that point, you go, you identify yourself to the
11 marine surveyors who are basically doing the same thing.
12 They're looking to make sure that the cargo didn't get
13 contaminated underway, and the captain or the chief officer,
14 and you say, hi, my name is Garth Kahl. I'm here, I need to
15 take a sample of this product, or I need to observe when you
16 open the holds that the product wasn't in some other way
17 contaminated. So it's not particularly difficult.

18 State agencies are already doing inspections of ships
19 for pests, or they're doing inspections of ships that are
20 leaving full of grain. So it's not a big lift for the shipping
21 companies or the ports. Again, you need to have people who
22 have a TWIC card, and you need to be on what they call the door
23 list. So you need to work with the shipping agent and the
24 importer.

25 The key is the importer needs to be required to

1 inform the certifier when the ship leaves the port of origin so
2 that the certifier can work with inspectors to get somebody
3 there at the right time. But once you know the General Hudson
4 is coming, it left Turkey on this date, it's easy enough to get
5 on the app and say, oh, yep, there it is. Okay. Oh, it's
6 cruising up the East Coast. Oh, it's going to go into New
7 York, it's going to go into New Jersey, or wherever it's going.
8 So it's not particularly difficult. It just is an area where
9 organic inspectors haven't worked much up until this point.

10 VICE CHAIR BRUCH: Thank you, Garth. I appreciate
11 that.

12 MR. KAHL: No, thank you. And thanks again for that
13 work you've been doing on the market bill. That's awesome.

14 CHAIR SMITH: Nate, please go ahead.

15 BOARD MEMBER POWELL-PALM: Thank you so much for your
16 comments, Garth, and for that technical expertise answering the
17 question there. That was a big question on my mind as well.

18 Going back to your dairy comment, for so long it
19 seems like producers in the organic community have been
20 pointing fingers at other producers. They're not grazing,
21 they're cheating. As opposed to the buyer, who seems to have a
22 lot more control over how this market works and who gives
23 access to it. What do you see as the next step to making the
24 dairy market more fair so that we can keep producers in the
25 space and not lose them, either out of livestock production or

1 out of organic?

2 MR. KAHL: Well, there's several things. I mean
3 someone -- a previous commenter talked about the farm crisis in
4 the 80s. I mean, honestly, the farm crisis in the 80s, part of
5 that was brought about by the repeal of 1930s-era price
6 supports. So we used to have dairy price supports. You
7 couldn't haul milk from California, Arizona and dump it into
8 the Northeast because, you know, even in the 1930s, the
9 Roosevelt administration figured out that it cost more money to
10 produce 100 pounds of milk in the Northeast than in California
11 or Arizona.

12 You know, in the best-case scenario, we could do that
13 in the organic market, absolutely. Now, that would be a big
14 lift, and it would require an act of Congress, but in the
15 ideal, we could go back to the 1930s in the organic market and
16 have some regional price supports.

17 And following that, I think we need the same kind of
18 targeted grants that the USDA is doing now to increase the
19 ability for local dairies or local dairy cooperatives, small
20 groups of operators, to do local bottling plants, to do value-
21 added, to do ice cream, to do cream, to do yogurt. That's a
22 huge lift.

23 You know, I work with a 100 cow dairy. She really,
24 really, really wanted to do a bottling plant. She ended up
25 going out of business before these, you know, before the most

1 recent rounds of grants came out from the USDA, but something
2 like that could have saved her. The ability to market local
3 grass-fed milk to a local market, to local retailers, or even
4 at farmers' markets, would be huge.

5 So, you know, those are two solutions. There's
6 probably more, but we need ultimately to look at the economics
7 of it because as you say, it's not just, oh, well, so-and-so's
8 got 1,000 cows. They're cheating. Like no, so-and-so's in
9 compliance with the regulation. The bottom line is we're all
10 fighting over the foils here.

11 BOARD MEMBER POWELL-PALM: So appreciate that. And
12 CACS, under the leadership of Amy, we've been looking at these
13 bottlenecks through a different discussion document. So it
14 sounds like you're saying that is worth the time, that we
15 should be examining these issues more.

16 MR. KAHL: Yeah, absolutely. And then, again, I
17 can't help but make another pitch for sounding sensible. I
18 mean there's no reason -- we need to look at risk-based
19 analysis. People say that here at every meeting but it really,
20 you know, the rubber hits the road on dairy producers.

21 Dairy producers work harder than, honestly, anybody I
22 know. And a small dairy producer, like that added paperwork
23 burden or that added two hours of inspection because that's
24 what it takes, that's a real burden. And when you're already
25 getting bumped around by everything else, it feels like yet

1 another incoming punch.

2 So, you know, obviously we need integrity. We need
3 to ensure the traceability is there. But there's got to be a
4 way to do this in a risk-based manner so we're not beating up
5 on people who are barely hanging on.

6 BOARD MEMBER POWELL-PALM: Amen. Thank you.

7 MR. KAHL: Thank you.

8 CHAIR SMITH: Okay. Up next is Luke Giannforte.,
9 I'm so sorry if I'm like getting that last name wrong.

10 BOARD MEMBER POWELL-PALM: The only reason I know the
11 answer to this is because it's the name of our governor. It's
12 Giannforte.

13 CHAIR SMITH: Okay. Giannforte. Great. Do we have
14 Luke, and I think --

15 MR. GIANNFORTE: I'm --

16 CHAIR SMITH: Wonderful.

17 MR. GIANNFORTE: Can you hear me?

18 CHAIR SMITH: Yes, I can.

19 MR. GIANNFORTE: Okay.

20 CHAIR SMITH: Let me just do like a call for some
21 next up people. Then I had Craig Schmitt. Then we're going to
22 try for Joseph Kibowatt, and then Randy Mitchell. And I know
23 that we're behind, and so hopefully this all works out for
24 everybody.

25 So, Luke, please state your name and affiliation, and

1 then you can get started.

2 MR. GIANNFORTE: Thank you. My name is Luke
3 Giannforte. I'm a certified organic farmer in Cazenovia, New
4 York. Our farm has been certified organic for 25 years. Our
5 rotation includes a variety of small grains along with row
6 crops and cover crops.

7 We sell our crops throughout the East Coast with a
8 focus on food grade markets, but also sell feed grade as well
9 as seed. We have had on-farm processing capabilities that
10 allow us to add value to most of the crops we grow as well as
11 reach different markets.

12 We recently received an Organic Market Development
13 Grant from USDA, and we will use these funds to improve our on-
14 farm processing of corn and soy meal that we then sell to local
15 organic dairies. I believe this grant is a great investment in
16 the organic community by the USDA. It will help grow the
17 organic market from within by supporting businesses that have
18 already invested in this market.

19 I also think the smaller, simplified equipment-only
20 option is a great way to help producers such as us by providing
21 enough funding to be the catalyst to encourage us to take the
22 next step forward. Many other grants available through other
23 channels don't allow funds to be used for equipment, and
24 oftentimes equipment is the main hurdle that is holding a
25 producer back. I would strongly encourage USDA to make this a

1 permanent program so producers can count on it being there to
2 apply for and allow them to continue to grow the domestic
3 organic market from the inside.

4 We have worked hard over the years to diversify our
5 market and the crops we sell, but that being said, we still
6 feel the depression in prices in the corn and soybean market in
7 recent years. At the OGRAIN meeting this winter in Wisconsin,
8 we had presenters say that the domestic producers need to
9 produce less corn and soybeans to stabilize the market and
10 bring prices back up to a profitable level due to the steady
11 stream of cheap imports.

12 That seemed backwards to me. We should be supporting
13 our domestic producers and encourage them to meet the demand
14 rather than yield to imports. We need to level the playing
15 field and make sure that the imports that are coming are all
16 playing by the same rules we are.

17 On our farm, we can trace any product that leaves our
18 farm all the way back to the field it came from, and we must
19 prove we can do this any time we have an organic inspection by
20 our certifier. The organic producers in this country put a lot
21 of time and effort into meeting and often exceeding the
22 requirements of their organic label, and we expect that anyone
23 foreign or domestic be held to the same standards. Thank you
24 all for allowing me the opportunity to speak and for all you
25 guys do to support the certified organic industry.

1 CHAIR SMITH: Thanks so much, Luke. Looks like you
2 have a couple questions here.

3 Kim, please go ahead.

4 BOARD MEMBER HUSEMAN: I'm good with this little
5 hand-raising thing. I could beat anybody at Family Feud.
6 Sorry.

7 Luke, I really appreciate your comments and the
8 highlight of the USDA Grant Program and look forward to hearing
9 more about how you're able to implement that to help bolster
10 the Northeast product availability for livestock entities and
11 producers of row crops and small grains.

12 My question to you centers around your customer base.
13 Have you noticed in the past year or two changes in outlets for
14 your products? Can you speak a little bit to that aspect in
15 your demand side?

16 MR. GIANNFORTE: Yeah, we have a very diverse
17 customer base. So we sell anywhere -- some of our value-added
18 products -- we'll sell anything from a pound-and-a-half bag of
19 flour to a tractor-trailer load of corn. So we have a very
20 diverse group of customers, so we've been sheltered a little
21 bit from some of the volatility and don't feel it quite so bad
22 because of that customer base.

23 But we definitely do feel some of our larger feed
24 customers are reaching out and saying, well, I can get feed
25 cheaper here, and it's -- they don't know where it's coming

1 from, and they question it. But as other people that have
2 spoken today have mentioned, the dairy industry has been tough
3 the last few years, and so they're looking to save every penny
4 they can. So the paperwork's there, but it makes everyone
5 scratch their heads.

6 CHAIR SMITH: Thank you, Luke.

7 Nate, please go ahead.

8 BOARD MEMBER POWELL-PALM: Luke, thanks so much for
9 your comments today. I just wanted to make sure I heard you
10 right that at OGRAIN, a pretty large organic conference this
11 winter, there were economists saying that we should lower
12 domestic production because of imports. Did I hear you right
13 there?

14 MR. GIANNFORTE: Yeah, they said that the only way we
15 were going to see prices return to levels they were at a few
16 years ago was to reduce production, you know, supply and
17 demand. And the only thing that the people in that room had
18 the ability to do was lower their production to reduce supply
19 and increase demand, which seems awfully backwards to me.

20 BOARD MEMBER POWELL-PALM: Absolutely. I couldn't
21 agree more. And so in thinking about the level playing field
22 that we've heard so many farmers talk about over the last
23 couple of days, an alternative to lowering domestic production
24 would be to make sure that imports coming in are legitimate.
25 Would you agree with that?

1 MR. GIANNFORTE: Yes. 100 percent

2 BOARD MEMBER POWELL-PALM: Okay. Well, really
3 appreciate you taking the time. I wish I had a screenshot
4 going for all the tractor backgrounds that we've had of folks
5 in the field calling in, because this is gold, and I really
6 appreciate you taking the time during such a busy year.

7 MR. GIANNFORTE: Thank you.

8 BOARD MEMBER POWELL-PALM: Thank you, Luke.

9 CHAIR SMITH: Okay. So you guys are, like I said,
10 keeping me on my toes today. Trying to be as accommodating as
11 possible. Do we have Joseph Kibowatt? I know Joseph has to
12 leave.

13 MR. KIBOWATT: Okay. Thank you. I don't know, can
14 you hear me?

15 CHAIR SMITH: I can hear you.

16 MR. KIBOWATT: Okay. Thank you.

17 CHAIR SMITH: After Joseph, then we're going to go
18 Craig Schmitt, then Randy Mitchell.

19 And so, Joseph, name and affiliation, and you can get
20 started.

21 MR. KIBOWATT: Okay. So my name is Joseph Kibowatt,
22 and I'm the agronomist at Timeless Seeds. Timeless Seeds is a
23 company that was founded in 1987 in North-Central Montana by
24 four farmers, and it's a certified organic enterprise which
25 contracts with about four to five dozen growers. These are

1 family farms across Montana and the neighboring states, and we
2 process and market U.S.-grown food-grade chickpea, lentils, and
3 specialty grains that's Emmer and some barley. And our markets
4 include domestic food distributors, natural food stores, food
5 manufacturers in the U.S., and some in overseas.

6 So Timeless Seeds, we support the need for residue
7 testing for organic integrity, and also to protect the family
8 farms and processes. And my submission today is actually
9 bringing into focus our own experience here at Timeless Seeds,
10 what we've experienced with residue contamination on our
11 products that could not market, that were supposed to be
12 certified organic.

13 The strong need is because the damage that is often
14 caused by the residue testing and contamination is always borne
15 by the farmer, in this case, for our case, and also by
16 extension processors like Timeless.

17 Part of the challenge is the loss of product
18 certification and loss of expected income, and this is because
19 sometimes we want to sell this product to, say, Europe, and
20 they have the very strict testing needs. And when they test
21 some of our products, once they find that they are out of spec
22 for their market, we can't even market this organically in the
23 U.S.

24 That being said, we've had situations where, like
25 chickpeas coming in from Argentina, have access to U.S.

1 markets. They have the organic label and marketed at even
2 below the contract price that we have. A case in point very
3 recently was some chickpeas that were marketed in Oregon at 70
4 cents, which is, you know, from Argentina. How can we compete
5 with that? It's almost impossible.

6 So we really need to protect our markets because,
7 one, our growers are doing their best, and we can't have
8 products that are coming from overseas competing with our
9 farmers for the same markets. And also, some of these products
10 that are being tested are not registered for false crops when
11 they are tested overseas. And we feel that we just need a
12 level playing field for everybody, whether it is domestic or
13 from overseas so that our farmers don't feel that they are
14 getting the short end of the stick.

15 Thank you for the opportunity to address the NOSB
16 this afternoon. Thank you very much.

17 CHAIR SMITH: Thanks, Joseph.

18 Nate, please go ahead.

19 BOARD MEMBER POWELL-PALM: Thank you, Joseph. Great
20 timing. Right on the money there, keeping us moving along.

21 When you were describing the amount of testing that
22 other countries do on American products and put a stop sale on
23 American-produced goods, it sounds like if we increase testing
24 even a lot, we're only playing catch-up, that this is in no way
25 an excess move but rather that we just haven't been using the

1 tools that so many other folks have been using for a really
2 long time. Would you agree with that?

3 MR. KIBOWATT: Absolutely. I think we need just to
4 increase the number of tests that we can. And also, you know,
5 because one thing is when everybody knows that there is a
6 market that's accessible, and we can access that market without
7 any barriers, I mean what are we doing to those people who are
8 trying to play by the book here domestically? I think we just
9 need to create a nice level playing field for everybody and
10 increase our testing.

11 BOARD MEMBER POWELL-PALM: Absolutely. Thank you so
12 much for your comments today and for your work out there.

13 CHAIR SMITH: Thank you so much for being with us.

14 Okay. Next up we have Craig Schmitt, then Randy
15 Mitchell, then Kim Dykman.

16 Craig?

17 MR. SCHMITT: Yeah, do you hear me okay?

18 CHAIR SMITH: I sure can. State your name and
19 affiliation, and then you can start.

20 MR. SCHMITT: Great. I'm Craig Schmitt. I'm a
21 farmer in Northeast Montana, and I'm part of the Montana
22 Organic Producers Co-op. In addition to growing grain, I'm
23 also -- and the greens I do actually are for Joseph a bit as
24 well, who we just talked to. I grow lentils and chickpeas and
25 other thing. In addition to growing grain, though, I'm also

1 building a seed cleaning facility that will allow me to sell
2 grain directly to customers, and it gets a little more value
3 add by cleaning it, getting it ready for mills that we can sell
4 direct and reduce a lot of cost that we tend to see in this
5 transportation.

6 So with that, I did apply for this organic grant
7 which we were accepted with for the OMDG, and that has been a
8 huge help to get going on some of the equipment and the
9 facilities that I need to do this kind of thing. And I'm
10 actually planning on doing some of this cleaning for a lot of
11 other area organic farmers in Northeast Montana so that we can
12 get more of the people in this area. We have to drive 360
13 miles one way to deliver grain many times, and it just, you
14 know, at your cost of \$2 a bushel just to get grain places is a
15 big expense.

16 So I'm excited to see that the USDA is helping with
17 that, and I hope that that will continue every year because we
18 continue building up facilities that will do these things,
19 there's a lot of needs for that, and to get things on railcars
20 cleaned and delivered. So that's one issue I'd like to talk
21 about.

22 The other one is the market stability. There's
23 organic consumers and everybody wants to have a stable market
24 when you're farming. There are so many variables that
25 controlling the price and the price getting out of hand because

1 of imports and different things should not be it. I mean, the
2 prices last year have changed huge.

3 Fortunately enough, I've gotten a couple of multi-
4 year contracts for wheat, but there's a lot of farmers that
5 don't know about those, and they're really hurting because of
6 that, and they're not even -- some are going out of organic
7 just due to the prices.

8 So anyway that's the two points I think I'd like to
9 make about these, in organic right now, I think that I'm
10 facing. So I think with that, I appreciate all the work you
11 guys do, and I just hope we can get there to keep moving things
12 forward.

13 So I don't know if there's any questions?

14 CHAIR SMITH: Looks like you've got one from Nate.

15 BOARD MEMBER POWELL-PALM: Thank you, Craig, for your
16 comments.

17 Two bucks a bushel, that's a lot of money. When
18 we're talking about marketing grain, I mean what you described
19 right there seems like one of the biggest barriers. How are we
20 moving this grain less so that we can retain some of that
21 value?

22 And if I heard you right, you were supportive of the
23 Organic Marketing Development Grant, and I think you said you'd
24 like to see it institutionalized, offered every year. Is that
25 correct?

1 MR. SCHMITT: Yes, absolutely. I mean I'm setting up
2 cleaning. I have a cleaner I finally purchased. I've got to
3 get the bins connected to it, grain handling. There's lots of
4 things, scales when you're selling it direct. And there's a
5 lot of people in the area who would be able to use this as
6 well, that kind of funding for some equipment, so they can
7 actually really increase the prices and be viable. So yes,
8 absolutely, every year would be awesome.

9 BOARD MEMBER POWELL-PALM: Fantastic. I really
10 appreciate that feedback. Thank you.

11 CHAIR SMITH: Amy, please go ahead.

12 VICE CHAIR BRUCH: Yeah, Craig, thanks for joining
13 us. Love to hear your story, and nice work on the
14 entrepreneurial piece of the organic farming with the vertical
15 integration that you're introducing. That's incredible.

16 Can you talk about the process that you went through
17 to ensure that you're putting in this vertical integration and
18 there's some markets at the end of the chain there? You
19 mentioned you worked with some of the end users. Did you work
20 with them in advance before you put the -- before you're
21 putting the infrastructure in, or are you working on that now?

22 MR. SCHMITT: That's what actually gave me more of
23 the idea was that, yeah, we have contracts with the mills
24 directly through the -- MOPC is a group in Montana -- a group
25 of us are doing that, and one particular customer needs it in

1 2,000-pound totes that are on a truck. That's not normal
2 shipping for farmers. So there's some infrastructure and
3 things just to be able to handle that. And other customers may
4 want it in a little different way because maybe they're going
5 into the city where they can't have like mass, you know, semi-
6 truckload of grain. So yes, it's because we have the market
7 already, and we have -- and we're growing it, and we're just
8 feeding it by supporting it with equipment.

9 VICE CHAIR BRUCH: Thank you.

10 CHAIR SMITH: Thanks so much for being with us today,
11 Craig.

12 MR. SCHMITT: Yeah, you're welcome.

13 CHAIR SMITH: Randy Mitchell, are you there?

14 After Randy will be Kim Dykman, then Maria Gerling.

15 MR. MITCHELL: Yes.

16 CHAIR SMITH: Okay.

17 MR. MITCHELL: I'm here. Can you hear me?

18 CHAIR SMITH: Yes.

19 MR. MITCHELL: Okay.

20 CHAIR SMITH: I think we have some slides for you?

21 Oh, great.

22 MR. MITCHELL: Oh, yeah, just the talking points,
23 right. Yes.

24 CHAIR SMITH: Awesome. Okay. Name and affiliation,
25 and you can get started.

1 MR. MITCHELL: Yes. My name is Randy Mitchell. I'm
2 Vice President of Nutrition and Research with Purdue Foods,
3 which is a large organic broiler producer. I've got 30 years.
4 -- I'm a practicing poultry nutritionist with 30 years of
5 experience. Next, please.

6 And, really, one of the things I wanted to talk to
7 the Livestock Subcommittee specifically about was the sunset
8 date of DL-Methionine for poultry that's coming up in 2026.
9 Most of you know the work of the Methionine Task Force, which
10 has long sought to ensure that organic poultry has access to
11 sources of methionine and to search for credible options to
12 synthetic methionine. But, to date, no viable alternatives to
13 synthetic methionine has been found, and it is essential for
14 the health of organic poultry and sustainability of organic
15 poultry farming to keep the option for synthetic methionine
16 available. Next, please.

17 So but I also wanted to discuss four questions that
18 was put into the meeting notes from the Livestock Subcommittee,
19 so I wanted to address each one of those one by one. Next,
20 please.

21 So the first one is about the -- given the supply
22 interruptions of soybean products during 2022 -- what are other
23 organic options for methionine? And so I think organic canola
24 meal, organic sunflower meal, which are both available
25 domestically, and rice protein meal, which is an import

1 product, are all sources of protein -- you can see the little
2 graph on the side here -- with substantially higher methionine
3 plus cysteine as a percent of total protein, and nutritionists
4 look at methionine plus cysteine together because they're both
5 sulfur-containing amino acids.

6 However, the other line there is looking at
7 digestible lysine which is a really critical amino acid for
8 broilers as they're rapidly growing. And one thing you'll see
9 is that these protein sources, while higher in methionine, are
10 deficient in lysine which is what is considered the second
11 limiting amino acid for a corn soy-based diet. So high
12 inclusions of these ingredients to meet the methionine
13 requirement will result in unbalanced diets because of the
14 lysine deficiency. Next, please.

15 The second question was about whether or not USDA
16 organic regulations should be changed to align with Canadian
17 regulations which are unrestricted on amino acid use, or even
18 the EU requirements which allow non-organic feed to be
19 contained. So and I think that adopting the Canadian
20 regulations to allow unrestricted amounts of synthetic amino
21 acids such as methionine and lysine, within the 5 percent non-
22 organic allowance, would allow producers to feed a wider
23 variety of feed ingredients to have more balanced diets for
24 leading to better health.

25 The Canadian standards also allow for the use of

1 phosphates for purposes of lowering phosphorus excretion.

2 CHAIR SMITH: Thanks so much, Randy.

3 Any questions for Randy? And these slides will be
4 available to the Board -- just so you're aware of that -- so
5 we'll be able to look at the rest of these. It looks like we
6 have a couple questions.

7 So, Nate, please go ahead.

8 BOARD MEMBER POWELL-PALM: Thank you so much, Randy.
9 You are the guy we want to talk to on the Livestock
10 Subcommittee. These are -- thank you for answering the
11 questions we asked. Really appreciate it.

12 When we're talking about animal welfare, and someone
13 talked about earlier the effect of overfeeding protein in order
14 to catch up on these essential amino acids resulting in high
15 ammonia levels in the barn --

16 MR. MITCHELL: Right.

17 BOARD MEMBER POWELL-PALM: -- could you speak to the
18 impact on birds that high ammonia levels have, and the welfare
19 considerations that go into that?

20 MR. MITCHELL: Sure, yeah. It's, you know, they can
21 obviously result, in worst cases, even blindness and things
22 like that, but certainly respiratory problems, also
23 photodermatitis on the feet.

24 But the higher protein is more than just ammonia.
25 There is higher incidences of enteritis-type issues when you're

1 allowing all that protein to -- the nitrogen to feed the lower
2 intestines, it just really allows the pathogenic bacteria to
3 really bloom and cause all kinds of problems.

4 BOARD MEMBER POWELL-PALM: Really appreciate that.
5 Thank you.

6 CHAIR SMITH: Nate Lewis, please go ahead.

7 BOARD MEMBER LEWIS: Are there any downsides to
8 poultry health or nutrient or feed formulation to have sort of
9 unrestricted amounts of methionine included in there? Are
10 there any potentials for abuse on the use of methionine? Is
11 there an incentive to overfeed methionine for some sort of
12 economic gain? I guess that's probably the heart of my
13 question.

14 MR. MITCHELL: Yeah, and that's a great question. It
15 really is. Really, after you meet the requirement for
16 methionine, overfeeding methionine actually will do the
17 opposite and hurt productivity. It's a very well-described
18 thing, and with any kind of amino acid, you feed too much of it
19 and it will actually cause birds to back off feed. And
20 methionine is actually quite expensive, so there's no reason to
21 -- for a producer -- there's no economic incentive for a
22 producer to do that.

23 CHAIR SMITH: Brian, please go ahead.

24 BOARD MEMBER CALDWELL: Yeah, thanks, Randy. Just
25 wondering whether there's any like animal slaughter byproducts

1 that can supply methionine that are not currently allowed, but
2 whether that would be a direction we might want to go.

3 MR. MITCHELL: Animal slaughter, well, it's strictly
4 prohibited, yes. I mean there would be -- I mean, you know,
5 obviously feather meal, which is something that would contain a
6 high amount of cysteine, which is the other sulfur-containing
7 amino acid, would have some. But that obviously would be
8 outside of the purview right now of what the standards allow.

9 BOARD MEMBER CALDWELL: Yeah. Any mammal byproducts?

10 MR. MITCHELL: Mammal, yes. Certainly they would
11 have some probably higher than -- a lot of it, the mammalian
12 animal proteins are really quite variable. So really depending
13 on what constituents would actually make that up, they would be
14 -- they certainly could add some methionine to that, to the
15 ration.

16 BOARD MEMBER CALDWELL: Good, thanks.

17 CHAIR SMITH: Kim, please go ahead.

18 BOARD MEMBER HUSEMAN: Hi, Randy. I really
19 appreciate your lens as a nutritionist in the organic space. I
20 think it's one that doesn't get heard as often, and so I'm so
21 glad that you're here today, so thank you first.

22 Secondly, my question is around -- we've brought this
23 up a couple of times -- is around animal welfare, and I'm
24 curious from your perspective if you feel like the current
25 optionality on some of the diet restrictions pose any kind of

1 an animal welfare concern.

2

3 M. MITCHELL: Yes, I do, and I see it. I put a
4 picture in my presentation which I didn't get through fast
5 enough which -- and this occurs occasionally when we see poorly
6 processed soybean meal where -- and it was especially rapid
7 during the year 2022, which we spoke about, with really few
8 options about soybean meal. When it's not processed correctly,
9 either over-processed or under-processed, particularly cysteine
10 is unavailable to the animal, and you can't add enough to keep
11 problems like that from occurring.

12 And it's not every flock, it's -- and also it's
13 especially bad when it gets warm because during heat stress
14 you'll also have poorer absorption of amino acids. So it's
15 almost like a tipping point that you do, and I can tell you as
16 someone who is responsible for nutrition and responsible for
17 animal welfare, in an organic diet there is nothing you can do
18 for that chicken there, nothing. And it is a very helpless
19 feeling when you have -- when you go in to see a house like
20 that knowing you've got no other options what to do, so --

21 BOARD MEMBER HUSEMAN: Thank you.

22 CHAIR SMITH: Thanks so much, Randy. Appreciate your
23 presentation.

24 MR. MITCHELL: Thank you. Thank you very much.

25 CHAIR SMITH: Yes. Okay. Up next we have Kim

1 Dyckman, then Maria Gerling, then Dave Chapman.

2 MS. DYKMAN: There we go. Can you hear me?

3 CHAIR SMITH: Sure can. State your name and
4 affiliation, and you can get started.

5 MS. DYKMAN: I'm Kim Dykman with AgriSecure. I live
6 in Western Nebraska where I work with 20 or so growers in
7 Nebraska, Colorado, Iowa, Illinois, and Georgia. AgriSecure
8 provides digital certification support.

9 We are concerned with fraud at the import levels --
10 and we've been talking about this for the last couple of
11 sessions -- but while the new SOE rule was needed, it doesn't
12 go far enough to address the organic imports that are
13 threatening our U.S. markets causing, in some instances, the
14 decertification of local U.S. organic acres due to market
15 conditions.

16 And how do we know and ensure that what a country is
17 exporting is actually provable? Are those countries producing
18 the amount of organic crop that they are exporting? Why are we
19 accepting organic products from food insecure countries? It
20 should be imperative that every shipload of organic crop be
21 residue tested, not just 5 percent of the certifier's customers
22 as is done now.

23 I know that the certifier that we work with the
24 closest has implemented new questions for certification
25 pertaining to the SOE rules, but they're addressing fraud at

1 the local level with those questions. Every imported load of
2 organic crop should be subject to residue testing in order to
3 protect our U.S. growers. We need a level playing field.

4 We know that U.S. grown product is superior. At a
5 local level then, in keeping with the new SOE, how do we ensure
6 bills of lading provide an accurate tracking measure of organic
7 crop? And how can we reconcile bills of lading to verify that
8 there are no double sales? Can we establish two or three best
9 practices for fraud prevention at our local levels? I'm happy
10 to provide some best practices from my group of growers.

11 Yesterday, a post on social media echoed the
12 confusion and open interpretation of SOE as some certifiers are
13 requiring semi-trucks to placard for organic. The certifier
14 our group works with said, no, bills of lading and organic
15 paper trail for truckloads are enough for them.

16 So, and then just quickly, the 823 program at NRCS
17 I'm hearing from my growers -- while in spirit it was great for
18 helping transition acres through the process -- the local
19 offices are not well informed, deadlines are missed. They
20 can't get the information they need to help growers through the
21 application process. This is a great program for transitioning
22 acres. We need to support it and get more organic acres going
23 in the pipeline. Thank you for serving on the Board and for
24 this opportunity to comment.

25 CHAIR SMITH: Thanks so much, Kim.

1 Any questions for Kim? I don't see anything. Oh,
2 hold on. I spoke too soon.

3 Amy, please go ahead.

4 VICE CHAIR BRUCH: Sorry, I was slow to raise my hand
5 there.

6 Kim, thank you for joining us today. Thanks for your
7 work with helping farmers transition to organic and stay
8 organic.

9 Can you talk about retention of acres with the
10 producers that you're working on or working with? Are they
11 looking to grow? Are they looking to maybe decertify acres?
12 Or where are they at in the spectrum?

13 MS. DYKMAN: I think they would grow. Several have
14 added fields this year that I work with, and some are
15 transitioning some new fields. But I've also lost three
16 different farms that decertified just because of market
17 conditions. And two were in Kansas, and they had a hard time
18 getting their crop to a place that would provide a fair market
19 price just because of trucking costs, and they were just too
20 far out. And then I lost a guy that was organic feedlot,
21 organic cattle, and it was just the -- he was just frustrated.
22 So same issue down the cattle side, just he lost processing --
23 he's in Nebraska -- couldn't find a way to truck them where
24 they needed to go so that it made sense economically.

25 VICE CHAIR BRUCH: Thank you, Kim.

1 MS. DYKMAN: Thank you, everyone.

2 CHAIR SMITH: Thank you so much.

3 Okay. We have Maria Gerling, then Dave Chapman, then
4 Doug Currier.

5 MS. GERLING: Yes, this is Maria Gerling. Hello. As
6 a consumer of organic food, I should be able to expect that the
7 soil in which the organic food has been grown has been free of
8 non-organic synthetic chemicals for the past two years.

9 Additionally, there are seven universal points that
10 consumers of organic food must demand from organic agriculture.
11 One, the use of decomposed organic matter in the soil where the
12 crops are planted. Two, the rotation of crops at use in
13 sustainable eco-agro system. Three, the recycling of organic
14 waste in order to provide minerals and nutrients to the soil.
15 Four, the use of non-toxic controls that will not harm the
16 environment or human health.

17 Also, number five, the use of non-synthetic
18 fertilizers, herbicides, and pesticides. Six, the consistent
19 use of the organic certification logo. Seven, authorize
20 officials to inspect and certify farmers, producers,
21 processors, distributors, wholesalers, retailers, involved in
22 the production of organic food.

23 Also, there are seven universal points that the
24 consumer should demand of the certified organic food on the
25 shelves at the market. One, the food comes from organic

1 agriculture. Two, the food is free of synthetic additives.
2 Three, the food is hormone-free. Four, the food has not been
3 radiated. Five, the food has not been genetically altered.
4 Six, the food has labeling that lists the organic ingredients
5 and its respective organic certification logo. Seven, the
6 backing of authorized entities that control and certify the
7 products as organic. Without insisting on the above listed
8 points, the consumer will be ripped off. Thank you very much.

9 This is an example. I have an apple here. I have it
10 on my table during four months, and this is a mummy. I mean,
11 what did they do to this apple? I'm sure that radiation is one
12 of the -- is what they did to it. So everything -- another
13 thing. You have products that the only thing is, oh, this is
14 from the market. Market? Yeah, the market, but where is this
15 coming from? We don't have any information. I spend my money
16 in organic food, and I feel ripped off. And it's -- okay.

17 CHAIR SMITH: Thank you so much for your comments.
18 It looks like you have a couple of questions here, so hang
19 tight.

20 Brian, please go ahead.

21 BOARD MEMBER CALDWELL: Yeah, thanks, Maria. You
22 gave some really clear enumerated points that we can use
23 because we've been talking about, okay, how is it best to
24 promote organic produce and products to the consumer? And you
25 laid it all out, so I really appreciate that. Thank you very

1 much.

2 MS. GERLING: Thank you.

3 CHAIR SMITH: Nate, please go ahead.

4 BOARD MEMBER POWELL-PALM: Very similar question.

5 What would you say is like the top two highest-punch takeaways
6 that consumers should know about organic and should expect from
7 organic to get them -- that they value?

8 MS. GERLING: Labels, labels, labels, true labels.
9 No cheating labels.

10 BOARD MEMBER POWELL-PALM: All right. Thank you.

11 CHAIR SMITH: Thank you so much for your comments,
12 Maria, and for being with us today.

13 MS. GERLING: Thank you.

14 CHAIR SMITH: Okay. We have Dave Chapman, then Doug
15 Currier, then Adele Durfey.

16 MR. CHAPMAN: Okay. Hello, everybody. I'm Dave
17 Chapman, co-director of the Real Organic Project, I'm a member
18 of the Organic Farmers Association, and I'm also a farmer who
19 runs Long Wind Farm in Vermont.

20 I want to talk about something I think we can all
21 agree about, which is rare for me. I've seen something very
22 disturbing in the last few years. I've seen a lot of small
23 farms leaving organic certification, and I'm sure we're all
24 aware of this. But just in the last year for the Real Organic
25 Project, we have lost 100 farms that we certify. That's close

1 to 10 percent of the farms that we certify as real organic.
2 And they've left the NOP program. And they're all small farms.
3 They're not the mid-scale. They're not the large farms that we
4 certify. They're the small ones.

5 And I've tried to think about what can we do, because
6 I think everybody in the National Organic Program loses by
7 this. I think Grimmway's and Driscoll's lose. I think
8 everybody loses when the small farms leave. And more and more
9 we see organic becoming a large-scale industrial farming label,
10 which none of us wants. It doesn't help the big or small
11 producers.

12 And I'm really struck by, in Denmark, where
13 certification is absolutely free. It's all paid for by the
14 government. And I actually think that that would be a huge
15 step forward for the National Organic Program. We could easily
16 double the number of certified organic farms in a year if all
17 certification was paid for. But at the very least, we could
18 try to get at least the certification entirely paid for in
19 smaller farms, maybe less than \$500,000 in gross sales. And it
20 would make a big difference.

21 The small farms often don't see an economic benefit
22 for getting certified. And when we began certification, what
23 we saw was people did it because they believed in a movement.
24 Now it's become a little bit more of a business proposition.
25 Farms are always struggling. So if we took away the economic

1 pain of getting certified, there's still a lot of paperwork and
2 whatnot that people have to do. But I think it could be pretty
3 important.

4 Right now, farms can get about 50 percent of their
5 fee paid for a small farm, up to \$750 through the FSA. They
6 have to wait half a year to get the money. It would make a big
7 difference if it was just covered by the government.

8 And finally, I just wanted to say that Real Organic
9 urges the NOSB to not permit the recycling of so-called
10 biodegradable plastic in compost. I know you're working on
11 that. Thank you. I'm happy to finish ahead of time.

12 CHAIR SMITH: We appreciate the 20-second yield. It
13 looks like you have some questions from Allison.

14 BOARD MEMBER JOHNSON: Thanks, Dave. I really
15 appreciate your comments.

16 On the cost share program, I really agree with you
17 that funding that goes just a little bit further to cover
18 producers' costs would go a long way, not within our power to
19 make it happen, but it is included in the transition proposal
20 that we're working on under the banner of the transition
21 initiative feedback and what could work better.

22 I'm curious if you have any numbers, like a sense of
23 how many producers might stay in the program longer if the cost
24 share reimbursement was greater, or conversely, producers who
25 were dropping when the reimbursement levels were lower. Any

1 numbers you could offer to help us get specific.

2 MR. CHAPMAN: Yeah, Allison, I wish I had some
3 numbers, but I don't. You know, maybe Jenny Tucker has some
4 numbers. I don't know. I sort of doubt it. I think that we
5 see this steady erosion of smaller farms leaving certification.

6 I hear from a lot of farms that it's just too
7 expensive. So, you know, they're not saying I can't possibly
8 do the paperwork. They're saying I can't come up with the
9 money. And on a smaller budget, that \$750 or \$1500, if they
10 don't know about how to get that money back, becomes a number
11 too big for them.

12 BOARD MEMBER JOHNSON: Yeah, thank you. I appreciate
13 that. The numbers are hard to come by, so anyone who's able to
14 even anecdotally collect some more details, I think help us
15 make the case. But I think you'll be hearing about this year's
16 cost share in the next month or so, so everyone should stay
17 tuned for that. Thank you.

18 MR. CHAPMAN: Great. Yeah, thank you.

19 CHAIR SMITH: Nate, please go ahead.

20 BOARD MEMBER POWELL-PALM: Thank you so much for
21 these comments, Dave. I really appreciate ROP's focus on
22 consolidation in markets and equal opportunity on an equal
23 playing field.

24 Do you think that \$750 is the difference between
25 staying in business and not? And I'll just give a little

1 context to that question. I was at the peak of a hill
2 yesterday rolling my alfalfa fields, looking at a neighbor farm
3 that used to be this just absolutely bustling sheep farm with
4 great community, inter engagement, and it's quiet now. There's
5 just nothing going on over there. And they used to be organic,
6 but they're just totally out of business.

7 And when I think about was cost share enough? In my
8 head, it's such a tiny amount of money that I worry we're
9 fighting over just peanuts when we talk about cost share. We
10 need to talk about -- I love your point about federal
11 government paying for the certification costs, but that even
12 seemed a little low. It's how do we get, you know, small
13 producers a slice of the pie that is the trillions of dollars
14 of the American food system. And I was wondering if you can
15 speak to how do we dream bigger and really ask for the world
16 that we want to see?

17 MR. CHAPMAN: I agree with you, Nate, of course. And
18 look, for my farm, \$750, I wouldn't notice it, honestly. But
19 for a very small farm, they absolutely do notice it. But the
20 question isn't just does that make the difference between
21 bankruptcy or not, because those 100 farms we lost didn't go
22 bankrupt. We have another number for those farms, the numbers
23 that went out of business.

24 These are the farms who are still farming the same
25 way, and they just chose not to be certified as organic, and

1 that's something that's happening. Do I think \$1500 would make
2 the difference? I actually do think it would make the
3 difference for a lot of small farms. But I agree with you. We
4 need to think bigger. And the real thing is how do we create
5 the market so that this works economically.

6 It's one of the things that drives me a little bit
7 crazy about let's put millions of dollars into organic
8 transition. And, you know, we know there are these great
9 programs out there, and people graduate, and they've been well-
10 trained, and then they go bankrupt. And what we need to do is
11 create the economic realities where these small farms and big
12 farms can thrive.

13 And for me, I believe that's about guarding our
14 standards so that they stay real, and guarding those false
15 imports that shouldn't be certified. All those things start to
16 raise it up. It used to be that a small organic dairy farm in
17 Vermont could make a good living. Now they're going out of
18 business. That's just about cost. That's about price.

19 BOARD MEMBER POWELL-PALM: I couldn't agree more, and
20 I really appreciate your perspective on this. And I just want
21 to highlight that we have a gosh-darn thread going here, folks.
22 If Dave Chapman with ROP and a grain farmer in Nebraska and
23 Montana all have the same thing, I think we're on to something.
24 So thank you very much.

25 MR. CHAPMAN: Thank you, Nate. Yeah.

1 CHAIR SMITH: Amy, please go ahead.

2 VICE CHAIR BRUCH: Thanks, Dave. Actually, the
3 conversation that you and Nate had kind of brought out some of
4 the answers I was seeking to my questions.

5 I was just curious to dive down deeper into these
6 folks that you know that are decertifying or getting out of the
7 program. You mentioned the cost share was a challenge.
8 Through your conversation with Nate, it sounded like markets
9 were also a challenge. Are there other barriers that you're
10 noticing with this group of 100 that you just mentioned?

11 MR. CHAPMAN: Well, you know, we certify all kinds of
12 farms, but we're probably heavier in vegetable and fruit farms
13 -- produce farms, and those issues are a little bit different.
14 For the grain farmers, for the mill farmers, it's just that the
15 market is so depressed, and I believe it's not because sales
16 are down. It's because I would say competition that actually
17 isn't quite legitimately organic is up. And, you know, we know
18 for the grain, yes, we've had domestic fraud, but we have a lot
19 of international fraud coming in. And we hope SOE will stop
20 that. We don't know. We'll see.

21 If we could stop that, I think automatically we would
22 see the prices go up and farmers could make a living. It's how
23 capitalism is supposed to work. And, you know, when we short
24 circuit that system, then everything starts to fall apart. So
25 I think, for me, the protection of the integrity in the

1 marketplace, all boats will rise that are really organic.

2 Yeah.

3 VICE CHAIR BRUCH: Thank you. Yeah, I appreciate
4 that extra information. And then one last question. We do
5 have a crop insurance document that we're discussing again this
6 upcoming board meeting. Is there any comments you'd like to
7 bring forth on behalf of produce growers for needs for change
8 on crop insurance?

9 MR. CHAPMAN: Jeez, us produce growers in Vermont
10 didn't know there was such a thing as crop insurance. So I
11 don't know what to say, except it doesn't seem to apply to us.
12 For the people it does apply to, I know that it needs some
13 reform, and it really punishes organic grain farmers. So
14 anything that you can do to guide that ship would be greatly
15 appreciated. You know more about it than I do. I'm not aware
16 of vegetable farmers using crop insurance, so I need to be
17 educated maybe.

18 VICE CHAIR BRUCH: Thank you.

19 MR. CHAPMAN: Thank you, Amy.

20 CHAIR SMITH: Jerry, please go ahead.

21 BOARD MEMBER D'AMORE: Yeah, I actually took my hand
22 down because I was going to give room for Mr. Chapman to talk
23 about competing labels on a single clamshell. And I'm thinking
24 better of that because it's a long discussion. But I would
25 like to say to the entire group the building of a common

1 language around this discussion is so important, and it's
2 happening right in front of my eyes, and I truly, truly
3 appreciate it.

4 MR. CHAPMAN: Yeah. Thank you, Jerry. I'll just say
5 I'm not opposed to a lot of logos on a label. I think that
6 there's room for that, and it's a reflection of the fact that
7 people's needs aren't quite being met by one label. And so,
8 but even in the EU where they have pretty strong federal
9 standards, there's an add-on certification in virtually every
10 country for a higher level. So I think that that can work.

11 But I agree. I think that we all have a lot of
12 common interests here. I just heard Paul Holmbeck speak, you
13 know, from Denmark, and he's an American who was head of
14 Organic Denmark for about 20 years. It was a very
15 inspirational speech about what they're doing with organic in
16 the EU, and they're making much more progress than we are.
17 They have vastly more acreage certified as organic. Their
18 organic sales are growing faster than America, and their growth
19 sales are higher than America.

20 So we should take some lessons from them. And
21 they're doing a lot in terms of getting the governments to
22 support organic, to support the marketing in the stores, to
23 support the farmers with technical support. We can do that
24 too.

25 CHAIR SMITH: Thanks, Dave. Thanks for being with us

1 today.

2 Okay. we have Doug Currier, Adele Durfey, then Jess
3 Alger, then we're going to take a break.

4 Go ahead, Doug.

5 MR. CURRIER: Hi. So, hi, my name is Doug Currier.
6 I'm presenting comments today on behalf of the Organic
7 Materials Review Institute. It's mission is to support the
8 growth and trust of the global organic community through
9 expert, independent, and transparent verification of input
10 materials, and through education and technical assistance. Our
11 comments are intended to provide technical data and other
12 information about materials to support the NOSB's work. Our
13 organization is accredited through the USDA's Quality
14 Assessment Division. I'm presenting comments today on inert
15 ingredients, compost, and proposed technical report template
16 revisions.

17 So first, inert ingredients, we continue to maintain
18 that an updated system used for the review and approval of
19 inert ingredients should ensure that any inert ingredient
20 approved for use in USDA organic production meets all of the
21 evaluation criteria in OEFFA. This updated system must also
22 not overwhelm the NOSB to the point where your mandate cannot
23 be fulfilled.

24 We do not support individual listings of inert
25 ingredients on the National List since that would most likely

1 mean that that second item, one that we review as a requirement
2 in a new updated system cannot be met. We maintain that the
3 assessment of many of the OEFFA evaluation criteria can be
4 fulfilled by considering EPA documentation used during their
5 past reassessment, work, and documentation, from subsequent
6 rulemaking efforts.

7 Consideration of remaining criteria evaluation and
8 how to present the outcomes of these evaluations, be it a
9 National List or otherwise, are areas that we encourage the
10 Materials Subcommittee to seek advice from experts at their
11 committee meetings. We encourage continued attention and focus
12 on the issue. The finish line as in sight.

13 Compost. I'm looking forward to exploring the
14 questions and issues the subcommittee has raised on compost at
15 the meeting next week in person. There is one point there I
16 wanted to highlight now that was just involving contamination
17 removal prior to composting.

18 We require composters that we work with that use raw
19 material or feedstocks that are at high risk for contamination
20 have a foreign materials removal method in place. So high-risk
21 feedstocks right now include green waste that are municipally
22 collected, like leaves, yard clippings, and food waste.

23 Also, just another note, we no longer consider the
24 term IREP to apply to input materials, and it's separate from
25 the concept of contamination and crop fertility inputs.

1 And then lastly, TR templates. As you've seen from
2 our written comments, we're not in favor of amending the TR
3 template in a way that officially expands the scope to include
4 focus on the use of excluded methods in the manufacture of
5 materials on the petition. Our position is not only coming
6 from an organization that currently writes these reports, but
7 it takes into consideration future organizations that might
8 have to review that work.

9 I've often heard over the years this question, yes,
10 we can ask for some of the documentation and information, but
11 what are we going to do with the information we get back? In
12 addition to that logistical challenge -- sorry, in addition to
13 the logistical challenges outlined in our comments, knowing
14 what to do with the information that is received is a major
15 concern for us given the history of this area when it comes to
16 applying the definition of excluded methods and their
17 subsequent prohibition in input material review.

18 CHAIR SMITH: Thanks so much, Doug.

19 MR. CURRIER: Sure.

20 CHAIR SMITH: Questions for Doug?

21 Go ahead, Amy.

22 VICE CHAIR BRUCH: Doug, thanks so much for OMRI's
23 comments and you representing some additional comments via oral
24 methods this time. I had a question on compost.

25 MR. CURRIER: Sure.

1 VICE CHAIR BRUCH: And, yeah, it's a pretty
2 comprehensive worked-in item that the Crop Subcommittee is
3 working on, and the Board. I didn't know, though, from your
4 opinion, should we also look to increase the scope further and
5 include a review of inoculants used for compost in this review,
6 just to add potentially further guardrails or framework,
7 because there's a lot of innovation happening with inoculants,
8 and they're leading to maybe modified practices such as
9 reduction of the need to mechanically turn these piles.

10 MR. CURRIER: From my experience, I think that's
11 covered under our current system. We're really looking at
12 anything that's added to a compost pile, and that would include
13 both material and those smaller inoculant-type materials. So
14 in my experience, we have that covered, and those inoculants
15 would need to meet that standard, basically being allowed
16 compost feedstock.

17 VICE CHAIR BRUCH: Okay. Thank you. And then just a
18 quick follow-up, with those inoculants do you sense -- I know
19 that OMRI has approved some inoculants for compost use. Is
20 there a risk there with excluded methods? Should we unpackage
21 that a little bit more on these inoculants?

22 MR. CURRIER: Not sure about that, but we do ask
23 about the use of excluded methods to manufacture any of the
24 input products that are applying for our review, so it would
25 definitely come out in our review if someone said yes to that.

1 But then it kind of gets back to this comment about,
2 well, we've got the information, what are we going to do with
3 it? And, you know, we've come up with these decision trees
4 that are in our manual back in 2002 that kind of get at that,
5 and so there's additional questions that we ask ourselves
6 whenever someone might say yes. We're working through those
7 trees in order to determine compliance.

8 VICE CHAIR BRUCH: Thank you. Appreciate it.

9 MR. CURRIER: Sure.

10 CHAIR SMITH: Franklin, please go ahead.

11 BOARD MEMBER QUARCOO: Yes. If I heard it correctly,
12 you said OMRI is not in favor of the revision of the TR
13 templates when it comes to excluded methods. Can you expand on
14 that a little bit more?

15 MR. CURRIER: Yeah. So there's a few things here.
16 One is just practicality of getting the information that we
17 would need to get in order to answer questions about the use of
18 excluded methods. We're talking about brand-name products
19 usually instead of large classes of materials, and the
20 proprietary nature of this makes it hard to get at the
21 questions that we would imagine would be asked in a TR
22 template.

23 There is the decision trees that I mentioned just now
24 in regards to how excluded methods definition applies to input
25 materials. And the way that that definition is written, it is

1 -- in our opinion -- very much based on looking at food and
2 final food and the production of food rather than input
3 materials. So there's that challenge that we see in that being
4 a great area in regards to how to apply that definition to
5 inputs.

6 CHAIR SMITH: Brian, please go ahead.

7 BOARD MEMBER CALDWELL: Yeah, thanks, Doug. On the
8 issue of inerts, basically it sounds like one of your arguments
9 against listing inert materials individually is it would
10 overwhelm the work that the NOSB has to do. But it seems like
11 from our initial kind of delving into things, that we're
12 talking about maybe 150 or so materials that are currently in
13 use, roughly, and that those can be -- some of those anyways --
14 can be grouped.

15 And so, it seems to me that, I mean it's -- I'm not
16 totally psyched about having more sunset reviews, but that is
17 spread over a five-year period. It doesn't seem to be
18 unmanageable to me, and I'm just wondering if you could kind of
19 chime in on that and just explain why that might be
20 unmanageable.

21 MR. CURRIER: Well, I think your perspective as a
22 board member is important here to answer that question but it
23 would seem that it could lead to an unmanageable system. So
24 that's our concern is that it's going to overwhelm the Board,
25 but if the Board is thinking differently, that is great to

1 hear.

2 It seems that there's a potentially heavy lift to get
3 a National List amendment, and having the sunset reviews could
4 or should, you know, be manageable. But I really take your
5 point about spreading things out, and if that's possible, then
6 yes, that should be part of the system.

7 BOARD MEMBER CALDWELL: Great. Thanks a lot, Doug.
8 Really appreciate it. You guys are the experts, so we want to
9 hear it.

10 CHAIR SMITH: Allison, please go ahead.

11 BOARD MEMBER JOHNSON: Thanks, Doug. Really
12 appreciate you being here and taking the time to put together
13 all these detailed comments.

14 I wanted to loop back to the TR template, and I'm
15 kind of puzzling over why the excluded methods questions seem
16 to be pretty different to you from other materials, and you
17 mentioned in response to Franklin's question that a lot of the
18 materials are proprietary, but you'd be preparing TRs about
19 generic listed materials. So could you unpack that a little
20 bit more for us? I'm sort of like having trouble following the
21 thread.

22 MR. CURRIER: Yeah, so I think that, yes, these are
23 generic materials. Depending on how the template is revised,
24 it could mean that we need to go out and figure out how things
25 are made -- I mean how these products are made at any time

1 ever. So I'm not saying that right, but it's like expanding
2 the scope so that we're needing to think about individual
3 products and how they might be manufactured.

4 I think the Vitamins TR in particular was helpful
5 because there was, you know, it was uncovered and put into the
6 TR about certain classes of vitamins used in livestock
7 production that are exclusively made using excluded methods.
8 So I think that is an example of how it could work, but the
9 aspect figuring out how things are made is just -- it seems
10 unreasonable. It seems unsustainable, you know, to try and go
11 out and find that information out.

12 So I think that it works to some level. You know,
13 vitamins is a good example. Some other microbial products are
14 perhaps something that could be lumped in as a group. But,
15 yeah, beyond that it gets really challenging.

16 BOARD MEMBER JOHNSON: I'm still having a hard time
17 wrapping my head around this. I really rely heavily on the
18 process sections of the TR, and oftentimes we say, okay, there
19 are five different ways this material is made. This is the
20 first way, this is the second way. And sometimes there are
21 even gaps in information, and the TR says, you know, we
22 couldn't find any more detail about X, Y, Z.

23 And is it that you just have to sort of like unknow
24 things that you know through OMRI'S certification of individual
25 materials or like would it be possible to just say we looked

1 into this, we ran up against a proprietary roadblock here. And
2 just that information even would be helpful for the Board to
3 sort of know there's some uncertainty or some digging that
4 could be done there.

5 MR. CURRIER: Yeah, I think that the main concern
6 here is confidence in that we are answering the questions as
7 presented, and once you hit that proprietary wall, it's going
8 to be hard. And that could be a finding in itself, you know,
9 and put that in the template -- sorry, in the TR. But, yeah, I
10 think we're just leery of the scope that we might be asked, or
11 whoever is doing the report writing could be asked to meet.

12 CHAIR SMITH: Mindee, please go ahead.

13 BOARD MEMBER JOHNSON: Thank you so much, Doug, for
14 all the work OMRI does and how you've helped us with the TRs in
15 general. I'm so impressed as a Board member with the work that
16 you guys do on the TR template.

17 MR. CURRIER: Thank you.

18 BOARD MEMBER JOHNSON: So, much gratitude for what
19 we're all up against in the land of transparency, living under
20 this USDA label and making these long requests for
21 transparency, and know that so much of what you do at Material
22 Review is helping us, and especially with the work on the TR
23 template. So please do extend our thanks to your team.

24 And sort of tracking back to Amy's questions on
25 inoculants, I thought I heard you say that if there was an

1 excluded methods indication in an inoculant question, you would
2 ask more questions.

3 MR. CURRIER: That is right. Yeah. So asking the
4 question and getting that answer is something we do for all of
5 these products that we're reviewing. Depending on what they
6 come back with, though, we take it through our decision tree.

7 So, yeah, it's -- yeah, it's --

8 BOARD MEMBER JOHNSON: Yeah, I don't know, I just
9 wanted to sort of appreciate the difficulty of the chicken and
10 egg and asking more questions, and that that's sort of what
11 we're up against right now, and appreciate you in the
12 conversation.

13 MR. CURRIER: Okay. Thank you.

14 BOARD MEMBER JOHNSON: Yeah.

15 CHAIR SMITH: So it looks like I have a question from
16 Wood, and then I have one, and then we'll see what's next.

17 Go ahead, Wood.

18 BOARD MEMBER TURNER: I just wanted to ask a
19 question, because I do think something you just said about, you
20 know, kind of the effort to sort of understand in more
21 complexity related to specific products and sort of all the
22 things that we're being asked to evaluate relative to the
23 National List.

24 You know, and one example that I wanted to -- I'd
25 love to get your thoughts on, I mean we talk all the time about

1 the role of mining in capturing materials that are used in
2 organic, and I never feel comfortable with the level of review
3 that we get from TRs, that we can gather from the community
4 related to the mining impacts globally from capturing
5 information that goes into products that we use in organic.

6 But it's still a question that we ask. It's still a
7 question that we want to understand. We want to try to push to
8 understand more fully what's actually going on. And the
9 community knows that we constantly acknowledge mining impacts
10 and often continue to keep those products on the National List
11 because of their essentiality in organic for a variety of
12 different reasons. And I guess for me that analogy is an apt
13 one because I sort of feel like it's a similar type of question
14 to what we're trying to include as we think about sort of more
15 deeply useful TRs, and I'm just curious if that resonates with
16 you at all.

17 MR. CURRIER: It does. And, you know, transparency
18 is absolutely critical to the work that we do. And so this
19 idea of not asking the question for fear of not really knowing
20 what to do with the information we get back may not be valid in
21 the long run.

22 But I think that one thing we haven't talked about
23 yet is the gray area in regards to inputs and how the excluded
24 method definition applies to those inputs, and that's just
25 another complication of diving into excluded method use with

1 inputs. You know, it's going to be hard to get the
2 information, what do you do with it in regards to that gray
3 area around inputs. And so on one hand, I absolutely
4 understand, you know, ask the question and get at it that way.
5 It's just this preparation for what to do when you get some
6 answers.

7 BOARD MEMBER TURNER: And my only point is we don't
8 nearly know enough about mining impacts globally in every
9 single case to really fully understand how to make those
10 decisions either, and we have to ask those questions. So I
11 appreciate that.

12 MR. CURRIER: Yeah.

13 CHAIR SMITH: Go ahead, Franklin.

14 BOARD MEMBER QUARCOO: Yeah. Coming back to the same
15 issue, if you look at it from other angles, I understand not
16 wanting to ask questions to which you don't have an immediate
17 response when you do get the answer. But looking at it from a
18 consumer's point of view, to think that somebody is refraining
19 from asking questions because they wouldn't know what to do
20 with the answers if they are not the favorable kind of answers
21 that is expected, that doesn't feel good for that to be a
22 reason for not asking the questions, from the perspective of
23 the consumer.

24 If you are on all the other sides of the table, it
25 sounds like a good reason, but as a consumer, that doesn't feel

1 like a great reason not to ask the questions, especially in the
2 kind of group in which we are today. We are thinking about the
3 environment. We're thinking about public health. We're
4 thinking about refraining from asking these questions. It
5 doesn't feel right.

6 CHAIR SMITH: Thanks, Franklin.

7 I mean, my question -- so number one, change is hard,
8 right? So if this happens, it will take some getting used to,
9 and that's okay. And I think for better or worse, you guys did
10 a bang-up job on these last round of TRs, and they might have
11 taken longer, but maybe you shot yourselves in the foot a
12 little bit. I don't know.

13 But we got a lot of useful information, and you're
14 right. I don't think we have all the answers of necessarily
15 what we're going to do with that. And I think that's okay, and
16 we're not, you know, I think we're going to continue to like
17 peel the onion layers and get more answers and ask more
18 questions.

19 Anyway, so my question is, I mean excluded methods
20 verification or the big three verification, really, is applied
21 to National List materials all the time, is it not?

22 MR. CURRIER: Yes, yeah. Definitely, yeah.

23 CHAIR SMITH: Okay. So maybe we need to talk more
24 about like the gray area. The other thing is maybe just more
25 clarity around, you know, we've been talking a lot about

1 fermentation and the Board digging into that more. Would that
2 be helpful? Like is that where a little bit of the grayness
3 lies?

4 MR. CURRIER: Well, yeah, I think what we found with
5 the Inducement of Genesis TR, the citric acid enzymes,
6 microorganisms, that the excluded methods definition is very
7 much written with plant breeding in mind, so that is one
8 observation we had.

9 And so, yeah, I think microorganisms are definitely
10 high risk for being produced via excluded methods. So perhaps,
11 yeah, you know, beefing up the sort of understanding of those
12 methods could help by way of the excluded methods definition.

13 CHAIR SMITH: Yeah. Okay. Thanks, Doug. I'm sure
14 we will continue this conversation.

15 MR. CURRIER: Okay.

16 CHAIR SMITH: Okay. I'm hearing we do not have
17 Adele.

18 Adele Durfey, are you on the line?

19 (No response.)

20 If no Adele, then we'll go to Jess Alger, I'll circle
21 back for Adele, then we'll take a break.

22 Do we have Jess?

23 MS. ARSENAULT: He's on the line. I'm thinking he
24 might be muted. Happens.

25 BOARD MEMBER POWELL-PALM: He says they're -- oh

1 there we go.

2 CHAIR SMITH: Yep. Okay. Jess if you could state
3 your name and affiliation, then you can get started.

4 MR. ALGER: Hi there. I'm Jess Alger, Stanford,
5 Montana. I raise cattle and grain. I'm a member of the MOA,
6 which is Montana Organic Association, and the Montana Organic
7 Production Co-op, and I'm also on the Board for National
8 Farmers Organization for organics. Well, they sell other
9 things too.

10 I'm here today to support using testing as a tool to
11 level the playing field when it comes to imported organic feed
12 grains. And as a farmer with someone with a lot of organic
13 friends, the situation in conventional imports floods the
14 organic market, and that's not good. Europe and Canada test
15 our products, and we don't test theirs much. So I know there's
16 been some other people talk about organic testing, but we need
17 to do that.

18 If USDA mandated that imported grain be tested, it
19 seems like the playing field would be a whole lot more fair.
20 Right now, good organic farmers in the Midwest are having
21 trouble because of these -- they're leaving organic because of
22 the low grain prices. They're good farmers, and their
23 competition is not fair right now. Testing imports will be one
24 way we can help ensure organic grain is legitimate, and the
25 market is fair for those farmers putting in the work for

1 organic.

2 I also hear that, well, on a side note, the cooking
3 oil is coming in from China and making the soybean market fall
4 off, so that's not good. I feel if you had an announcement to
5 the companies, to the countries, that we're going to actually
6 start testing these grains, that might even help. They might
7 say, oh, I guess we better not send the conventional market.
8 So announcements should be made for testing grains, and then we
9 should start doing it. They're bringing conventional grain
10 into the U.S. and killing our organic market with imported
11 grain. So I guess that's all I have, I guess. Thank you.

12 CHAIR SMITH: Thanks so much, Jess. It looks like
13 you have a question from Nate.

14 BOARD MEMBER POWELL-PALM: Thanks for joining us
15 today, Jess, and for your work, supporting organics as a farmer
16 and on all those boards.

17 You were mentioning just the level playing field.
18 Again, I think we've heard a lot from folks saying we want a
19 fair shake at this thing. And could you speak to the
20 opportunity that you see organic -- for all of those different
21 farmers who aren't getting a crack at it because of unfair
22 competition -- do you see organic as having a huge potential to
23 grow in the States if we had a level playing field?

24 MR. ALGER: Yes, I do. The NFO has got an organic
25 grain buyer, and he's finding a lot of problems. And if a lot

1 of people would, I think, sell more, especially grain, to the
2 organic world, I think it would work.

3 BOARD MEMBER POWELL-PALM: Super appreciate that. I
4 was thinking about the organic transition initiative. I think
5 these sort of questions are top of mind. How do we make a
6 marketplace for folks to transition into that treats them
7 right? So thank you so much for your time to comment to us
8 today.

9 MR. ALGER: Thank you, Nate.

10 CHAIR SMITH: Okay. Adele, are you here? Did we
11 find Adele? And then you're going to have to star six.

12 MS. DURFEY: Hi. Can you guys hear me?

13 CHAIR SMITH: Yes, we can.

14 MS. DURFEY: Oh, lovely. Okay. I got you.

15 CHAIR SMITH: Yeah. You can state your name and
16 affiliation, and then you can get started.

17 MS. DURFEY: Sounds good. My name is Adele Durfey,
18 and I represent Clear Frontier, and we have a large number of
19 partner growers, mostly based in the Midwest, and a lot of them
20 are organic. And I wanted to comment on increasing the testing
21 requirements for organic commodities that are imported from
22 abroad.

23 So I missed part of the last speaker because I'm just
24 dialing from my phone, but I think I've heard some other
25 reiterations about increasing our stringency and the integrity

1 of kind of the market and what we bring in. And so I'll just
2 kind of circle back to one of the questions that you had just
3 posed for the last speaker.

4 But the reason why that I wanted to touch on this
5 topic is that I spent a lot of time working internationally,
6 specifically in the country of Ukraine, and also consulting in
7 various countries in the Eastern Bloc, and we ran a very large
8 operation, six to seven various types of row crops in Western
9 Ukraine, and at that point in time, GMO was banned in the
10 country.

11 But much of the soybean and the corn produced there
12 was -- it really was GMO corn and soy. And although it was
13 labeled as non-GMO, any testing could easily be circumvented by
14 strategic testing, bribery, or probably both. So I'm not good
15 to admit or not admit if our company actually participated in
16 some of that, but it was very prevalent.

17 So it has been now nine years since I've been in
18 Ukraine, but just speaking with former colleagues and current
19 farmers there and friends, nothing much has really changed.
20 And even the USDA has come out with a report that they estimate
21 that 50 to 60 to 65 percent of soybeans produced in Ukraine is
22 GMO. So I'm just talking about specifically Ukraine and
23 circumventing GMO regulations, but if it's just that easy for a
24 non-GMO producing country to produce that much GMO products,
25 you can easily see the parallels in playing with organic

1 certification, right?

2 So I guess what I'm saying is that there's no serious
3 repercussions in the U.S., that the U.S. can impose on foreign
4 producers that mirror what we're doing here. So the next best
5 steps, in my mind, would just be to increase the required
6 testing once it hits U.S. shores, and it needs to be controlled
7 by U.S. regulators.

8 So it wouldn't matter the producing countries or
9 which port it went through or how many times it changed hands
10 or where it was traded and what labels were put on it ahead of
11 time. Once it hits the U.S., we do our own testing, and I
12 think that we need to increase not just the volume of testing,
13 but the breadth of the contaminants as well. So that's just my
14 comments I wanted to say on that.

15 And I think there's been some previous comments about
16 how this impacts U.S. growers, and in conversations with what
17 I've spoken with other growers, this year alone we have
18 individuals that are taking soy production out of organic and
19 putting it back into conventional just because the math doesn't
20 work because it does take a lot more time and input
21 requirements to get that done. So, yeah, that's my comments.
22 Thank you.

23 CHAIR SMITH: Thanks so much, Adele. Hang tight. It
24 looks like you have a question here.

25 Wood, please go ahead.

1 BOARD MEMBER TURNER: Hey, Adele, thanks for the
2 feedback and the commentary. I really appreciate you calling
3 in. I just want to say that the value of that practical
4 experience on the ground, really detailed sort of real-life
5 experience about what's actually going on is super useful and
6 super helpful. So I really appreciate you taking the time to
7 call in. Thank you.

8 MS. DURFEY: Yeah. Thank you.

9 CHAIR SMITH: We've got another question from Amy.
10 Amy, please go ahead.

11 VICE CHAIR BRUCH: Yeah, Adele, thanks for joining us
12 today and contributing to the conversation. I know you
13 mentioned you were a part of a farming operation in the
14 Ukraine, and it was conventional. I'm just curious from a P&L
15 standpoint -- profit and loss -- conventional production in the
16 Ukraine, how did that compare to cost of production in the
17 U.S.? Was it pretty similar for conventional to grow like a
18 bushel of corn or a bushel of soybeans?

19 MS. DURFEY: Yeah, so the direct input, like the
20 seed, a little bit lower, just because we know that it's a poor
21 country essentially, so all of the big marketing seeds that are
22 not produced in Ukraine that are shipped from the U.S. and
23 Europe would come in in line, maybe a little bit lower in terms
24 of production, fertilizer, but at a very small degree,
25 production costs.

1 But the biggest piece was the labor. So we had a,
2 you know, you might pay somebody maximum \$5,000 a year to work
3 on a farm. You can't do that here in the U.S. So I mean
4 that's anywhere from \$300 to \$500 a month, and that's where a
5 lot of costs.

6 Typically, you know, on an organic operation, you do
7 need to have a little bit more labor than a conventional farm.
8 So I think it's very difficult to compare and say that it's
9 fair to get products from abroad which you can't really 100
10 percent be certain that it is organic and produced by the
11 regulations that we have here in the U.S. I think it's a
12 little unfair to look at it like that just because also of the,
13 you know, the positioning of the input costs and such. So does
14 that answer your question?

15 VICE CHAIR BRUCH: Yeah, it does. And then a quick
16 follow-up. Just from an agronomic standpoint in the Ukraine,
17 you know, labor is definitely when you're doing organics, labor
18 is important for hand weeding, but labor can't really take care
19 of disease and insects. What was the disease and insect
20 pressure over there in Ukraine, maybe comparatively speaking,
21 to the Midwest?

22 MS. DURFEY: Oh, yeah, so in a large portion of
23 Ukraine it is -- in the western part where we were farming,
24 there was a lot of weed pressure. We had a lot more rain, and
25 weed and insect pressure. So we would have -- we'd be able to

1 grow wheat, barley, your cereals, your oilseeds, your canola,
2 your rapeseed, soy and corn, and that was kind of our rotation
3 in buckwheat.

4 And so the pressure that you would incur was quite
5 significant. If you would look at our crop plan, we would have
6 several different strains of insecticides, herbicides, and also
7 defecation because of the wet weather you would have Roundup.

8 And that is something that's very quite common. Even
9 as you move more east into the more arid and drier regions,
10 there was a lot of defecation that was going on with either
11 2,4-D or Roundup, right before, you know, 10 days, 2 weeks
12 before you take the crop off.

13 So it's very common practice. People are trying to
14 hit yields there. They aren't really trying to get a
15 certification for a specific organic market because there
16 really isn't one established in Ukraine.

17 VICE CHAIR BRUCH: Thanks, Adele. I appreciate that.

18 CHAIR SMITH: Nate, please go ahead.

19 BOARD MEMBER POWELL-PALM: Adele, could you tell us a
20 little bit more about what S2G's strategies focuses on as far
21 as deploying capital for organic farmers?

22 MS. DURFEY: Sure. We don't actually deploy capital
23 for them. Our kind of -- well, okay, so I'm not here
24 representing S2G.

25 BOARD MEMBER POWELL-PALM: Okay.

1 MS. DURFEY: We are a portfolio company, so I can't
2 really speak -- so I think there are some other avenues that
3 they pursue in terms of helping organic producers and growers
4 all across the U.S., so I can't really speak to that. But in
5 terms of --

6 BOARD MEMBER POWELL-PALM: Hold it right there.

7 MS. DURFEY: -- well, okay, Nate.

8 BOARD MEMBER POWELL-PALM: I was just going to follow
9 up where we've had a lot of questions about like what is
10 limiting the growth of organic and the entry of new farmers
11 into organic? And it sounds like, if I'm hearing you right,
12 it's really an unfair market that we're having farmers possibly
13 transition into. And so things like access to land, the
14 paperwork for certification, all kind of come second it almost
15 seems like to this problem of having a market that will
16 actually reward organic growers. Am I missing something there?

17 MS. DURFEY: No. I think you hit the nail on the
18 head. Yes. I think if there was a reward for people, a larger
19 incentive right now for people to transition, they would do it,
20 and they could easily take on the paperwork and understanding
21 how to actually execute the operations. Yeah. I think those
22 become secondary to the incentive, really, because it all comes
23 down to can you make a living for your family. So if you
24 can't, then you're going to do it a different way. Yeah.

25 BOARD MEMBER POWELL-PALM: Really appreciate your

1 comments today. Thank you.

2 CHAIR SMITH: Thanks for being with us today, Adele.

3 Okay. We are at break time. We're going to come
4 back at 10 after the hour. We are an hour behind, everybody,
5 so Board members, pithy, pithy.

6 Up next is BJ McNeil, Charles Smith, and Annette
7 Cook. See you at 10 after.

8 (Recessed at 4:00 p.m.; reconvened at 4:10 p.m.)

9 CHAIR SMITH: Welcome back, everybody. We are going
10 to try to make up some time here. So we're going to get
11 started with BJ McNeil.

12 Hi there. You can state your name and affiliation.
13 Oh -- it looks like when you said hi, I could not hear you.

14 MR. MCNEIL: Can you hear me now?

15 CHAIR SMITH: Yes, yes, yes.

16 MR. MCNEIL: Hi. My name is BJ McNeil. I'm an
17 organic grain farmer in Central South Dakota. And I have three
18 things I want to talk to the Board about today, and I
19 appreciate the Board giving me an opportunity to speak.

20 I want to talk about the rollout by the NRCS on their
21 Organic Management Practice Standard 823 and about the box
22 rollout of it. The other thing I wanted to talk about was the
23 flooding into our current commodity markets of imported grain.
24 And the third thing I wanted to talk about was what I feel are
25 some antiquated rules on organic crop production when we talk

1 about the use of micronutrients in an organic cropping system.

2 But for the sake of time, I really want to focus on
3 the importing of grain and how it's affecting us as producers
4 and us as an industry, too. It's not just affecting producers.
5 We still have approximately 25 percent of our corn in the bin
6 on site here that we can't get a bid for. Nobody's in the
7 market for it because there's plenty out there, plenty being
8 imported, and nobody will give you a solid bid right now on
9 delivery.

10 The second thing, we still have, I'm going to guess
11 50 percent of our soybeans in the bin, and we can get a bid on
12 soybeans, and we could sell them. However, the price we're
13 being offered is below the cost of production. So we're just
14 kind of on hold hoping something happens in the market that
15 allows us to move them. We also still have sunflowers in the
16 bin from 2022 production that we still haven't been able to
17 move. They're still in our bin today.

18 So the importation of grains has drastically affected
19 our operation. I believe some data I've seen up to 30 percent
20 of feed grains are imported currently in the U.S., and what
21 it's done to us is we've had to move some acres -- we've
22 chosen, I guess, to move some acres out of organic back into
23 conventional because the price being offered just wasn't
24 covering the cost of production. So we did. We've moved
25 probably 25 percent of our acres back into conventional

1 practices it's just for those economic reasons only. No matter
2 how much we believe in organics and how much we want to do it,
3 we still have bills we have to pay at the end of the day.

4 The other thing that I think is being overlooked in
5 this whole grain importation situation is the squeeze going on
6 to smaller feed mills. You have some larger corporations right
7 now who are controlling the majority of the imports into the
8 U.S., and when they're bringing in those large amounts of
9 imports they're also setting the price on those imports. And
10 then they're going to these smaller mills basically and saying,
11 hey, here's what you're going to have to pay for soybeans, and
12 if you don't like it you've got to buy U.S., but we know you
13 can't afford to buy U.S. because you won't be able to compete
14 in the feed market. So the pressure is on these smaller feed
15 mills.

16 CHAIR SMITH: Thanks, BJ. Any questions?

17 Nate, please go ahead.

18 BOARD MEMBER POWELL-PALM: Thanks for your comments
19 today, BJ. Could you speak a little bit more about the
20 pressure you're seeing on small infrastructure, small feed
21 mills, small thrust plants, and what you kind of see coming
22 down the pipe for the effect on those pieces of the supply
23 chain?

24 MR. MCNEIL: Well, I'm not going to use specific
25 names because I don't want to call anybody out. But I do know

1 of a smaller feed mill, I believe it was in Missouri, that was
2 bought out by a larger group simply because that smaller feed
3 mill knew he could no longer compete with the extra use or the
4 more imports that this larger feed mill was using. He didn't
5 want to use the imports, however, he was being forced to do it.

6 And because of that, he couldn't deal with his local
7 producers anymore. He was feeling bad not buying from
8 producers he'd been buying from for 20 years. He didn't like
9 the way he was looking. In a lot of ways, he didn't like the
10 way he was looking in the community because the community was
11 getting mad at him, you know, you're not giving me enough for
12 my beans for cost of production.

13 And, of course, he's getting the brunt of that, but
14 it's really not his fault. He has to compete against this
15 bigger guy down the street that's importing all these beans and
16 offering feed at a cheaper price. So he just wanted out of it.
17 He was tired of the stress and just didn't want to deal with it
18 anymore, so he sold to the larger mill.

19 BOARD MEMBER POWELL-PALM: Appreciate that. Thank
20 you.

21 CHAIR SMITH: Nate Lewis, please go ahead.

22 BOARD MEMBER LEWIS: Thanks, BJ. Can you briefly
23 talk about the third topic you were interested in talking
24 about, the micronutrients, and what you phrase as antiquated
25 restriction?

1 MR. MCNEIL: Well, yeah, because so we're trying to
2 use less manure, trying to use less inputs, and do more. We
3 don't want to spread manure all over our ground. I mean it's
4 we do it, yes, but we don't have to do high amounts to hit
5 certain yield goals or whatever where we're trying to grow
6 certain types of production.

7 Where, with the use of micronutrients and other
8 inputs, we can foliar apply and decrease those amounts we have
9 to broadcast over top of the ground and put out there where it
10 could get washed away, or we could have erosion issues, where
11 wind issues with neighbors with the smell when you're putting
12 manures out, all those other issues they encompass. We can use
13 micronutrients to go out there and have the same effect on the
14 crop and microdoses. So we're using extremely low doses.

15 The situation happened to us last year we wanted to
16 put a molybdenum product, a Moly product, out on soybeans.
17 This product went out 3 ounces per acre, and it was only 10
18 percent Moly, so 0.3 ounces per acre of Moly were actually
19 going out over these acres.

20 And it wasn't a problem with showing low moly because
21 that was on a test. The problem came that that product also
22 contained some selenium and some cobalt. Trace amounts,
23 though, just because I think it was natural. It came in on the
24 mined product when they're making the Moly, so there's trace
25 amounts in there. But because it just had those trace amounts

1 of selenium and cobalt, they wanted us to prove that we were
2 deficient in cobalt and selenium.

3 Well, you show me a lab in the U.S. that I can do a
4 selenium test on my soil or my tissue. They're very far and
5 few. Now, I did find one in Ohio months later that maybe we
6 could have sent it to. But in the meantime, it cost us
7 production. We weren't able to put the Moly out. We lost some
8 yield on the soybeans.

9 And it just seems a lot of times it could use a
10 little common sense because the selenium and cobalt that were
11 in there would have been like putting a teaspoon full over a
12 football field. We're talking such small amounts here. It
13 just didn't make any sense to me. So that was really
14 frustrating for us.

15 BOARD MEMBER LEWIS: Yeah, I appreciate the context,
16 and I thank you for that.

17 MR. MCNEIL: Yeah, I understand you don't want to go
18 put 10 pounds of cobalt out some -- or 10 pounds out or a bunch
19 of copper out or something, but I mean let's just use a little
20 common sense when we're dealing with these things.

21 CHAIR SMITH: Allison, please go ahead.

22 BOARD MEMBER JOHNSON: Thanks so much, Bradley, for
23 your comments. You may have partially answered this in your
24 response to Nate, but I'm curious. You said there was about a
25 25 percent cost reduction in taking some of your fields out of

1 organic, and I'm curious if you could speak to the main cost
2 differences that you're up against, like where the savings are
3 in going conventional.

4 MR. MCNEIL: Well, in conventional the cost saving,
5 number one, is labor. And number two for us, it's about a push
6 on inputs whether we're doing -- because manure for us is
7 expensive. We're not in a huge livestock area, so if I'm going
8 to get the nutrients on my field, I actually have to bring
9 those nutrients from several, almost 100 miles away, and it
10 costs a lot to get that up here. So my inputs on organic just
11 in fertility and stuff are not twice, but probably 1.8, I'd
12 say, higher than in my conventional fields.

13 And the big thing, too, is on the conventional side,
14 because I was conventional, I still had some good yields on
15 there, so my insurance and those programs are actually a little
16 better and easier on the conventional side than the organic.
17 So there was a whole host of reasons why we did it. And we
18 took out -- I mean, I'll be honest, too, we took out some of
19 our poor acres that were tougher to manage. We kept the easier
20 managing ones, the better fields in organic.

21 But it was those fringe fields where it was just, you
22 know, whether it was heavy weed pressure, just lighter soil, or
23 whatever the condition was, those hard to manage fields where
24 you had higher inputs, higher labor, higher everything else,
25 just weren't penciling, so we put those back into conventional.

1 BOARD MEMBER JOHNSON: Super helpful. Thank you.

2 CHAIR SMITH: Amy, please go ahead.

3 VICE CHAIR BRUCH: Yeah, BJ, thanks for joining us.
4 Very sobering comments you provided us with. I just wanted to
5 say thank you for participating in the process though.

6 One comment cycle, or two comment cycles ago, you
7 mentioned about crop insurance reforms and enterprise units by
8 practice, and exciting news that RMA had mentioned to us in our
9 last meeting that that was effective this year. So, yeah, I
10 wanted to just at least follow back and close that loop with
11 you.

12 So it's really good to use these channels to try to
13 make positive change, and hopefully we'll be able to make some
14 positive change on the other issues you brought up as well.
15 But thank you, and best wishes this farming season.

16 MR. MCNEIL: Thank you.

17 CHAIR SMITH: Thanks so much for being with us, BJ.

18 MR. MCNEIL: Thank you.

19 CHAIR SMITH: I am hearing that we don't have Charles
20 Smith. Is that true?

21 Charles, are you out there?

22 MS. HOLM: No, we don't see him right now.

23 CHAIR SMITH: Thank you so much, Andrea.

24 Okay. Moving on to Annette Cook, then we'll have
25 Erin Silva, and then Duane Myer.

1 You can state your name and affiliation and then get
2 started.

3 MS. COOK: Can everybody hear me okay?

4 CHAIR SMITH: Yep, you're good.

5 MS. COOK: Okay. Annette Cook, Secretary of the
6 Simmons Grain Company, Salem, Ohio. I want to first thank the
7 Board for giving me the opportunity to speak today.

8 My brother and I are third-generation family business
9 owners. We are a 100 percent organic soybean processor. We
10 believe in organic and what it means. However, we are at a
11 time where if the NOP doesn't act swiftly, the seal could be in
12 irrevocable danger. This concerns me as an organic business
13 owner and as a mom who relies on the availability and integrity
14 of organic products to feed my family.

15 We need better oversight on foreign production and
16 imported product. Simmons Grain supports a measure for residue
17 testing on all foreign imports. We need to implement not only
18 pesticide testing on all imports but also full-panel solvent
19 testing on any manufactured product.

20 The documents under discussion are only an aid to the
21 current procedures, and less of an enhancement to the fraud
22 prevention measures. The NOP 2611-1 does need additional
23 review for pest or herbicides commonly found in the global
24 supply chain. For NOP 2613, the document is great for raw
25 commodities and any processed items that have established

1 tolerances, but not all highly refined or processed products
2 have tolerances, and how to handle those needs to be defined.
3 A refined product cannot be treated the same as the raw
4 commodity it was made from, which is the current course of
5 action.

6 If the goal is to curtail fraud in the supply chain,
7 we need to take a better look at three major points to be
8 successful. First, we need to look at producer groups.
9 Producer groups were great in an immature and developing market
10 where certification was cost prohibitive to small farms, and it
11 helped them to gain access to the market.

12 However, the market has matured past this point. The
13 concept of grower groups is absurd and has become a place for
14 harboring fraud. It is simply how the model is being used, and
15 the NOP is allowing it. Large foreign entities, potentially
16 with domestic ties, are managing these and are able to
17 overstate yields, blend in conventional product, and accelerate
18 land transition, and the pure size of these operations allows
19 it to go undetected for years.

20 We can no longer change how these groups are
21 regulated and need to simply remove the model. SOE requires
22 that all steps of a transaction now hold a certificate, yet we
23 allow this type of self-policing to take place outside of our
24 borders, and we think it's enough. It's not. Each producer
25 needs to hold their own certificate.

1 Secondly, we need to evaluate equivalency. The goal
2 of equivalency is to allow the producers in those countries to
3 have more markets available without having to hold multiple
4 certificates. Currently, we allow products of other countries
5 to be directly imported into the U.S. under another country's
6 equivalency. This is a large loophole that needs to be closed.
7 Equivalency should be afforded to a product's country of origin
8 only.

9 Lastly, we need this mass balancing to take place
10 immediately. Right now we have countries exporting organic
11 products far and above their actual capacities to the U.S. Our
12 slow reaction to this alarming situation is detrimental all the
13 way to the domestic farmer. We try putting funding into place
14 for transition, but we can't promise these farmers that they're
15 going to have a place to sell their crops when they transition.

16 We're not doing enough, and we need more NOP boots on
17 the ground to address this situation. The U.S. cannot continue
18 to be the dumping ground for fraudulent products, and the rules
19 need to be applied consistently and evenly. Thank you.

20 CHAIR SMITH: Thanks so much. It looks like, yes,
21 you have a question from Kim.

22 BOARD MEMBER HUSEMAN: Hey, Annette, thank you so
23 much for your voice today. I think this has been a great
24 opportunity for the community to hear the lens of the organic
25 crush plants and the facilities in the U.S. and the playing

1 field that we're on.

2 So my question to you is around producer groups. Do
3 you have any data or understanding of what you think the amount
4 of imports are coming into the U.S. from grower groups?

5 MS. COOK: I do not, but I believe in a couple
6 speakers, like they will have more information surrounding
7 that.

8 BOARD MEMBER HUSEMAN: Excellent. Thank you so much.

9 MS. COOK: Mm-hmm.

10 CHAIR SMITH: Okay. Thanks so much, Annette. Thanks
11 for being with us today.

12 MS. COOK: Thank you.

13 CHAIR SMITH: Next up is Erin Silva, then Duane Myer,
14 then Jacob Golbitz.

15 MS. SILVA: Good afternoon, everyone, and thank you
16 NOSB for allowing me to make some comments this afternoon. I'm
17 in the Orlando airport, so I apologize if there's some sound
18 behind me.

19 I'm a professor at the University of Wisconsin-
20 Madison, working in organic and sustainable cropping systems,
21 and I've been working with industry partners on issues related
22 to organic curing powders for the last eight years. University
23 of Wisconsin-Madison was recruited to bring together a team of
24 scientists and industry partners to look at the feasibility of
25 transitioning from conventional curing powders to organic

1 curing powders. So this transdisciplinary team of agronomists,
2 horticulturists, meat scientists, economists, and industry
3 experts put together a plan of work to move this issue forward.

4 The research conducted by the University of
5 Wisconsin-Madison and the University of Florida has
6 demonstrated that organic celery and Swiss chard can be
7 produced with adequate levels of tissue nitrate using rates of
8 organic nitrogen fertilizers, more than what is used for
9 standard table celery. These higher rates of nitrogen
10 fertilizers, to our knowledge, is also the case in the
11 production of conventional curing powders and the vegetables
12 that are used as raw products.

13 However, these higher rates can likely be managed
14 through cover cropping and other responsible ways of nitrogen
15 application to minimize negative environmental consequences,
16 although more research is needed to be confirming what are the
17 best management practices depending on soil type, crop
18 rotation, and specific environments.

19 While our research in two major production regions
20 has generated recommendations for the appropriate level of
21 nitrogen fertilizer needed in those environments, we still need
22 to collect more data across working farms to validate these
23 results, also across more harvest conditions as well, to
24 optimize the timing of harvest of the raw product.

25 While organic sources of curing powders are now

1 available, specifically through Diana Food, concerns still
2 remain with respect to the feasibility of these sources as
3 meeting the entire organic meat processing industry and the
4 reliability of these sources over time since this is a pretty
5 nascent sector of the industry. These concerns include the
6 availability and consistency of supply as well as understanding
7 the season-to-season variability between sources for which,
8 again, we need further research.

9 Our current research has also investigated the impact
10 of organic curing powders on processed organic meat quality and
11 food safety. This work conducted at University of Wisconsin-
12 Madison has demonstrated that organic sources of curing powders
13 produce equivalent food safety and quality parameters as
14 compared to conventional sources. However, more work is needed
15 in partnership with industry to optimize these formulas to
16 account for these novel organic curing powder sources,
17 including Swiss chard.

18 To further scale up supply, more research is needed
19 to understand how to optimize the fermentation of organic
20 juices used to produce the nitrite that is actually used in
21 curing powders. New technologies are being explored to produce
22 high-quality, consistent product that is required by industry
23 using these organically lab practices. In addition to this
24 organic fermentation research, scaling up supply also requires
25 a continued assessment of transportation, processing, and

1 handler logistics to ensure consistent quality. So, in
2 summary, we're not ready to move on to a completely organic
3 supply chain at this point.

4 CHAIR SMITH: Thanks so much, Erin. It looks like we
5 have a question from Allison.

6 Allison, please go ahead.

7 BOARD MEMBER JOHNSON: Thanks so much, Erin. I
8 appreciate you doing this, especially at the airport. At least
9 you're not on a plane. Thanks for your dedication. You, I
10 think, summed it up there at the end, but so it sounds like
11 we're potentially on track in five years to be there at the
12 next sunset, but we're just not quite there this time around.

13 MS. SILVA: Yeah, but I make some parallels to the
14 organic seed industry where we're still kind of working on
15 aspects of supply and demand, and certainly we've demonstrated
16 that this can be done feasibly, but we need to work with our
17 industry partners to make sure that transition is smooth and
18 they're not compromising issues with supply chain and product
19 quality.

20 BOARD MEMBER JOHNSON: Great. Thank you so much.

21 CHAIR SMITH: Nate, please go ahead.

22 BOARD MEMBER POWELL-PALM: I just want to say what a
23 gosh darn rock star you are for getting this all done in the
24 airport, so thank you for taking the time to talk to us.

25 Do you feel like there's -- I guess, if you were to

1 pinpoint the challenges that you've observed in your research,
2 would you say they're more agronomic or more post-harvest
3 supply, post-harvest handling that's the current barrier, and
4 where would you see the industry investing most to make this a
5 reality in five years?

6 MS. SILVA: Yeah, I think from the research that
7 we've done and going into some of the feasibility agronomics, I
8 think Swiss chard is actually something that could be used, and
9 again, in terms of mitigating environmental consequences,
10 almost like a cover crop.

11 But there's issues with Swiss chard in terms of the
12 stability of the nitrate within the tissue. So I think more
13 research needs to be done almost with like the post-harvest
14 aspects, optimization of harvest time, and the stability of the
15 nitrates we're ensuring a consistent supply of raw product to
16 the processor. But, yeah, it's a little bit more of the post-
17 harvest side of things that we need to invest in at this point,
18 as well as working more with our meat processing partners to
19 ensure that they have a smooth transition with the change in
20 raw product supply.

21 BOARD MEMBER POWELL-PALM: Thank you.

22 CHAIR SMITH: Wood, please, go ahead.

23 BOARD MEMBER TURNER: Erin, super helpful, both in
24 terms of the sunset review, but also in terms of just how we
25 think about applied research coming out of the research

1 priorities that we articulate every year. And I'm just
2 curious, you kept mentioning the need for more research, more
3 research, and I'm sensitive to what Allison said about trying
4 to get to that place five years from now where this is a slam
5 dunk. There's no reason to sort of be dealing with this issue
6 anymore.

7 So you mentioned the need for more research. Are
8 there enough researchers working on this? Do you feel like
9 we're getting -- is this touching enough sources of good data?
10 I'm just trying to figure out how to -- I'm trying to figure
11 out the efficacy of the research priorities and whether or not
12 there's enough funded research going on out there and whether
13 there's enough people involved in this kind of work. Because
14 the size of the industry is huge, but the organic meat industry
15 is -- well, not huge -- getting larger, and we'd like to see it
16 get larger. The question is, we need researchers.

17 MS. SILVA: Yep.

18 BOARD MEMBER TURNER: So can you talk at all about
19 that connection between these two priorities?

20 MS. SILVA: Yeah, I mean the NOSB's priority list is
21 extremely helpful for us at land-grant universities to justify
22 our research, and this initial investment was a \$2 million
23 grant from the USDA Organic Research and Extension Initiative.
24 And I was just -- I'm flying back from that PD meeting where I
25 was just presenting this research.

1 So the project team, some of the -- we brought on
2 additional people as the project evolved -- is very interested
3 in going back to that funding source to apply for more research
4 funds to expand and continue this research. And our industry
5 advisory group has been extremely helpful to refine our
6 research priorities over time and make sure that the applied
7 research is relevant to their needs and to go into their R&D.

8 So there is interest in the group and, again,
9 expanding more people as we understand where are the
10 bottlenecks, and we have to bring on more expertise, and going
11 back to USDA and asking for even more funding to support this
12 effort. So it's kind of an iterative process of finding the
13 right people as needs evolve and new issues arise, but
14 certainly those research priorities are extremely helpful.

15 CHAIR SMITH: Thanks so much, Erin. Such promising
16 news. Safe travels.

17 MS. SILVA: Thank you.

18 CHAIR SMITH: And Dwayne Meyer, you're up next. Then
19 we have Jacob Golbitz, then Pete Kapustka.

20 Duane, state your name and affiliation, and you can -
21 -

22 MR. MEYER: Okay. Can you hear me okay? All right.
23 I'm coming to you as a producer. I just want to thank
24 everybody that's on the Board for this opportunity to say a few
25 things here.

1 We run a father-son operation, two families. We're a
2 small to midsize I would call, just corn grain -- corn and
3 beans, oats, and we have several hog confinements that we use
4 the manure for our nitrogen needs. Member of -- we certify
5 with OCIA. And I've appreciated the time here just to listen
6 as I've been on here. A lot of really neat things.

7 But my big thing here is we need a level playing
8 field. I'm not against capitalism. I think that's the way
9 it's meant to work. You've got to compete or find something
10 else to compete in. I just feel like from the imports coming
11 in that we're really struggling on that. That's obvious
12 because of the pricing right now that we've got.

13 Just I feel like the testing needs to be done. I
14 mean when we take our product to town or to the buyer, we're
15 tested on every load, and if we're not tested on every load,
16 they have a strategy there that they take care of -- they
17 specifically, when we take our stuff, not just everything that
18 everybody comes through, but our stuff.

19 So we're held to a high standard, and I feel like
20 there's a lot of this coming in that has no standard at all.
21 And just even by being here on this, you know, listening in,
22 I've heard more that scares me worse than what I was when I
23 came into this. So just -- I'm here to advocate for, you know,
24 to take care of some of this fraud at the import levels and
25 make a level playing field.

1 One of the guys, BJ I think, talked about the
2 micronutrients. That's a big thing in our operation too.
3 We've got -- that's another separate thing here -- but we're
4 really hamstrung with some of the micronutrients because we
5 have to prove that it's deficient in every category, and that's
6 a real, real high standard to do that.

7 So I think I don't have a whole lot more things here.
8 I don't mind competing. I just want to compete in a level
9 place. And I appreciate you guys and all the efforts that
10 you've put into this, and it's obvious to sit here all day long
11 for days at a time to listen to all this, that's a big
12 sacrifice. So I want to say thank you for that. That's about
13 all I've got for now.

14 CHAIR SMITH: Thanks so much, Duane. Any questions
15 for Duane? Looks like Amy has one for you.

16 VICE CHAIR BRUCH: Duane, I was just going to say
17 thanks for lending your voice to the process here and
18 commenting. It's really important to do this, and I appreciate
19 it. Thank you.

20 MR. MEYER: Thank you for being able to do this. I
21 appreciate it a lot.

22 CHAIR SMITH: Thank you for spending some time with
23 us this afternoon.

24 Okay. Up next, we have Jacob Golbitz, then Pete
25 Kapustka, and then Audre Kapacinskas. Those ones were tough

1 for me.

2 Okay. Jacob, please go ahead.

3 MR. GOLBITZ: Am I good?

4 CHAIR SMITH: You're good.

5 MR. GOLBITZ: Thank you. My name is Jacob Golbitz.
6 I'm a director at Agrimeris. We're a consultancy involved in
7 research and reporting on production, trade, and legalization
8 of agricultural products, and we focus on organic identity-
9 preserved and other specialized grains. And for the last
10 several years, we have worked with various stakeholders in the
11 U.S. organic soybean supply chain to investigate pricing and
12 authenticity of imported organic soybeans and soybean meal.

13 Most recently, we've been looking at organic soybean
14 and meal imports from Africa where much of the organic soybean
15 production comes from small-holder farmers consolidated into
16 entities referred to as producer group operations in the AMS
17 and SOE.

18 The USDA's National Organic Program allows for the
19 certification of small producers outside the United States to
20 -- according to the language in the SOE -- help small overseas
21 farmers to access the U.S. organic market and enable handlers
22 to source products that are not produced in the United States.

23 Producer good certification is not limited to
24 products not produced in the United States however, and over
25 the last six years we have seen a dramatic increase in U.S.

1 imports of organic soybeans and soybean meal at prices
2 undercutting domestic production, reducing demand for
3 domestically produced organic soybeans, threatening domestic
4 production and acreage, as well as domestic organic processing
5 and crushing operations that produce soybean meal for organic
6 livestock production and organic vegetable production.

7 Furthermore, while facets of the SOE rule,
8 particularly the requirements for the NOP export certificates
9 and all trade intermediaries be NOP certified, will increase
10 the visibility of organic imports and create a paper trail in
11 the investigation of potential organic fraud. The issue of how
12 a third-party certifier can effectively authenticate the
13 organic status of products grown by, in some cases, literally
14 thousands of smallholders within a single producer group
15 operation is not directly addressed by the SOE rule and likely
16 represents an Achilles heel in the process.

17 Keeping the U.S. organic supply chain plentiful and
18 diverse by facilitating certification and importation of
19 organic products not normally produced in the U.S., as well as
20 facilitating U.S. market access for smallholder organic
21 producers overseas, are both laudable goals. However, if these
22 goals are pursued at the expense of domestic production and
23 ultimately deprive American farmers the opportunity to
24 profitably grow organic crops, we risk losing hard-earned
25 organic acres and have traded these for dependence on

1 questionably produced and processed foreign production.

2 We are asking that USDA NOP takes a close look at
3 producer groups, the criteria used to justify them, and how to
4 strengthen the rules that govern them so they can be considered
5 by Americans that U.S. invokes supply chain rather than threats
6 to American producers, processes, and the entirety of the
7 supply chain.

8 CHAIR SMITH: Thank you.

9 Questions for Jacob. I see a couple.

10 Kim, please go ahead.

11 VICE CHAIR BRUCH: Hey, Jacob. I really appreciate
12 your lens and your comments today. I'd asked a question a
13 little bit ago around the data of grower groups who provide
14 import products to the U.S. Do you happen to have any numbers
15 that would support that percentage?

16 MR. GOLBITZ: So I do have some numbers. So we
17 imported 526,728 metric tons of soybeans. That's including
18 actual whole soybeans and then soybean meal. The soybean meal
19 in this number is expressed through the soybean group. Those
20 were our total imports in 2023.

21 Of that 526,000-plus metric tons, according to our
22 analysis, about 291,000 metric tons -- considerably more than
23 half of that -- came from Africa. Now, how much of that out of
24 Africa came from these producer groups, I do not have an exact
25 number for that. However, that is the dominant needs of

1 organic production from the countries that are exporting to the
2 U.S. as far as we can tell.

3 BOARD MEMBER HUSEMAN: Thank you, Jacob.

4 CHAIR SMITH: Amy, please go ahead.

5 VICE CHAIR BRUCH: Jacob, thank you for joining us
6 today. Thanks for all the work that went into the report that
7 you submitted via the written docket.

8 I have two questions for you. One was on your
9 comments that you submitted to the written document. You
10 mentioned availability of organic ag data is just minimal.
11 What types of ag data would you like to see in order for us to
12 provide more black and white information to solve fraud?

13 MR. GOLBITZ: Acreage. That's what I'd like to see.
14 I would like to know what the actual growing areas are.

15 VICE CHAIR BRUCH: Okay. Plain and simple. Okay
16 Sounds good, and I agree. We had an initiative -- acres on
17 certificates -- on board, and that was something that we really
18 strongly believe as well. We need transparency with the acres,
19 especially internationally. But, yeah, that's helpful.

20 MR. GOLBITZ: With acreage, we can pretty much figure
21 everything else out. That's really the black box from our
22 perspective looking into this and really gathering as much data
23 as we possibly can. That's what we need.

24 VICE CHAIR BRUCH: That makes sense. And another
25 question, you know, in the United States -- and a lot of folks

1 have commented on this -- on robust rotations, robust
2 rotations. When you were looking at the data internationally,
3 the information you submitted was focused on Africa. Are you
4 seeing that crop rotations are in the mix, or are you seeing
5 constant soybean production on these acres that you're
6 analyzing?

7 MR. GOLBITZ: Well, again, if we had better acreage
8 data, we'd be able to answer that question.

9 VICE CHAIR BRUCH: Okay.

10 MR. GOLBITZ: What we have in the reported data are
11 some wild soybean acreage that, you know, they don't look like
12 they're the results of the regular rotation. Of course,
13 there's a lot of turmoil and strife in some of the areas where
14 this acreage is, and that may be involved in utilization or
15 even just reporting to get numbers out. The numbers that we
16 see vary so widely, it's really hard to make sense of it, and
17 it's also hard to have confidence in the accuracy of those
18 numbers as well.

19 VICE CHAIR BRUCH: Thank you. I appreciate it.

20 CHAIR SMITH: Franklin, please go ahead.

21 BOARD MEMBER QUARCOO: I just -- I brought my hand
22 down, so I'll pass for now.

23 CHAIR SMITH: Oh, sorry. I didn't see your hand go
24 down, Franklin.

25 Thanks so much, Jacob, for spending the afternoon

1 with us.

2 And we are going to Pete Kapustka and Audre
3 Kapacinskas, and then Kenn Jenkins.

4 MR. KAPUSTKA: Good afternoon. I'm Pete Kapustka, a
5 59-year-old, 50-year organic farmer and owner of Red Hill
6 Organics, an 800-plus acre organic farming operation that
7 operates in Minnesota and Wisconsin, but is based where I live
8 in Fort Dodge, Iowa. My desire to farm organically is stronger
9 than the distance that it takes me, obviously.

10 I grew up on a family farm and graduated from Iowa
11 State with a degree in agricultural business. Following the
12 untimely death of my father in 1987, I took over the family
13 farming conventional operation. After weather and cyclical
14 market factors, I exited my dream in 1992 and spent the next 28
15 years working with conventional farmers in co-ops, feed
16 businesses, and farm input companies, in positions such as
17 sales manager, regional manager, and business development lead.
18 Some were multinational, some were startups, some were large,
19 and some were small. I observed management, and with a few,
20 even participated in defining the direction of the company.

21 In 2020, at age 56, I decided to again pursue my
22 farming, but as an organic farming operation. I consciously,
23 and against the advice and wishes of many, refused to follow
24 conventional farming herd, and hence the name Red Hill
25 Organics. I continue to push the pencil and manage my

1 operation as logically as I can.

2 I'm telling you all this in the hope that you
3 understand how and what I think of the current situation in the
4 organic farming world as I see it. The biggest concern my
5 operation faces is the lowering of the market price by the
6 flood of the fraudulent grains that everybody knows is going
7 on. Therefore, the USDA must implement a process of sampling
8 each and every imported load of organic grain that enters the
9 United States market.

10 My experience tells me that it is a matter of time
11 when -- not if -- the organic-minded consumer realizes that
12 fraud that could be stopped does not stop for a variety of
13 reasons. The USDA needs to take all actions including, at a
14 minimum, testing each and every imported seed to prevent this
15 ongoing problem.

16 Brand and industry destruction is the likely outcome
17 if we avoid this fact. Think of Anheuser-Busch and Bud Light,
18 think of Planet Fitness, as the foreshadowing of what our
19 industry would look like when informed consumers revolt,
20 ruining all our business and personal interests.

21 By taking a strong and proactive position of testing
22 each and every load, the USDA limits the damage at a minimum
23 should fraud be disclosed. Without it, our industry would be
24 faced with making only the best of bad decisions. How could
25 you explain to a consumer why contamination occurred and you

1 know that you could have prevented the problem?

2 Think about this. How many individual farm
3 operations contribute to a contained shipment of grains? Is it
4 ten? Is it a hundred? Is it a thousand? Can 1 in 20 loads
5 could be tested as if they were domestically produced?

6 It's an established fact that a minimum of five
7 percent of U.S. farm operations have an examination every year.
8 Additionally, during the annual recertification, all
9 information necessary for domestic operations to be in
10 compliance needs to be available.

11 CHAIR SMITH: Thanks, Pete.

12 MR. KAPUSTKA: Access to our domestic markets is a
13 privilege, not a right. Shouldn't the consumer expect import
14 grains to abide by the same standards? Even if you believe
15 import market access is a right, all rights carry
16 responsibilities. To be clear --

17 CHAIR SMITH: Okay. Pete, you're going to have to
18 wrap it up. I'm so sorry. You are over your time. I'm so
19 sorry. And we're running really behind schedule. So thanks so
20 much for your comments.

21 Does anybody have any questions for Pete?

22 Great, Nate, go ahead.

23 BOARD MEMBER POWELL-PALM: The pithiest of comments.
24 Thank you for that calculation question, Pete, of how many
25 family farms does one 30,000-ton ship represent? So I think

1 that's something to chew on. Appreciate your time today.

2 MR. KAPUSTKA: Thank you.

3 CHAIR SMITH: Thanks so much for being with us this
4 afternoon.

5 And the next speaker is Audre. I'm so sorry. I
6 think I said Andre, and I even have my glasses on.

7 So Audre, please go ahead.

8 And after Audre, we have Kenn Jenkins, and then Kate
9 Newkirk.

10 MS. KAPACINSKAS: No problem at all. Good afternoon.
11 My name is Audre Kapacinskas. I'm a principal at S2G which is
12 a multistage investment firm focused on venture and growth
13 stage businesses across food and agriculture, oceans, and
14 energy. We have a commitment to creating long-term measurable
15 outcomes, and we invest capital and provide value-added
16 resources to entrepreneurs and leadership teams pursuing
17 innovative market-based solutions that are cheaper, faster, or
18 better than traditional alternatives.

19 As part of our mission, we are dedicated to
20 empowering farmers, including those who champion organic
21 practices. Our goal is simple yet profound, to provide the
22 necessary resources for farmers to flourish and expand their
23 impactful organic work. By providing access to capital, we
24 help ensure that these farmers have the means to grow and
25 thrive. We believe American organic farmers represent

1 important innovation and progressive thinking, especially when
2 it relates to soil health.

3 At S2G we recognize organic farming not just as a
4 practice but an important part of the future of food
5 production. We're supportive of farmers who choose to adopt
6 organic practices as part of their environmental sustainability
7 practices and way to maintain viable businesses. This helps
8 sustain their livelihoods, families, and communities.

9 However, recent years have brought unprecedented
10 challenges to American organic farmers, from supply chain
11 disruptions to volatile crop prices. These dedicated
12 individuals who have invested heavily in mastering organic
13 farming now face incredibly turbulent times.

14 We at S2G, we envision a world where sustainability
15 encompasses consistency, where farmers perceive organic
16 agriculture as a reliable market with a level playing field.
17 And despite criticism suggesting otherwise -- and as many folks
18 on the call today have mentioned -- organic farming does
19 undergo rigorous testing. And by elevating this aspect of our
20 industry and utilizing it to verify the authenticity of
21 imported organic products, we can ensure integrity and bolster
22 customer confidence. Transparent testing practices benefit
23 consumers and create more stable conditions for growers,
24 fostering a healthier and sustainable agricultural landscape.

25 We applaud the work that you all do, from working to

1 understand how we can use testing to keep illegitimate imports
2 from crashing American organic markets, to building better
3 markets that increase demand for organic, to highlighting how
4 crop insurance can work better for organic farmers. The work
5 you all have been doing is an important part of what we need to
6 realize a stronger organic future. So thank you for all the
7 work that you all do, and I'll give you 18 seconds back.

8 CHAIR SMITH: Thank you so much.

9 Nate, please go ahead.

10 BOARD MEMBER POWELL-PALM: We appreciate those 18
11 seconds. I really appreciate that you brought up the consumer
12 in this entire discussion. A lot of it is we've been talking
13 about prices and how to make a level playing field. But I
14 would say that -- and I was wondering if you would agree --
15 that when you hear most podcasts about what is organic to the
16 layperson, oftentimes they say, I don't know because they don't
17 test. And while that's not entirely true, it seems like we
18 could really bolster confidence if we tested more. Would you
19 agree with that as far just as an overall proposition, value
20 proposition?

21 MS. KAPACINSKAS: I would, and I think the fact that
22 there's a regulatory framework that supports the organic
23 standard is incredibly valuable, and I think there is a lot of
24 confusion in the market at the moment given kind of varieties
25 of claims that are currently available.

1 BOARD MEMBER POWELL-PALM: Thank you so much for your
2 comments today.

3 MS. KAPACINSKAS: Mm-hmm.

4 CHAIR SMITH: Jerry, please go ahead.

5 BOARD MEMBER D'AMORE: Yes, good afternoon, and thank
6 you for your comments. I listened carefully and maybe missed
7 it, but did you give any hint as to how you currently today
8 would look at partnering with an organic grain farmer?

9 MS. KAPACINSKAS: Sure, yeah, there's a variety of
10 ways. So we have actually invested in a number of operations
11 that are currently operating organic and identity-preserved
12 farms. We've invested in technologies that work closely with
13 growers, and in many instances the entrepreneurs that have
14 created those technologies, that have built those businesses,
15 actually come from growing backgrounds, from producer
16 backgrounds.

17 And we're also involved in a variety of conversations
18 that are focused on providing additional financing to growers
19 to help them with adoption of some of these new technologies
20 that do represent risk for them but that could potentially
21 offer a more resilient path forward as it relates to more
22 sustainable farming practices.

23 So those are just a handful of ways that we engage
24 with growers, but inherently everything that we do through our
25 funds, we will only be successful if the grower is successful,

1 so we care very deeply about them.

2 BOARD MEMBER D'AMORE: Let me ask another question,
3 if I may.

4 MS. KAPACINSKAS: Sure.

5 BOARD MEMBER D'AMORE: My question is -- and for
6 context, I'll ask you if you've been listening for the last
7 hour or so -- and if you have, then okay, that makes it easy.

8 Listening to the requests, the demands, the crying
9 out for an even playing field, which I actually agree with
10 entirely. I don't think there is one. So you as an investor,
11 does that taint how you might look today at an organic grain
12 producer?

13 MS. KAPACINSKAS: Not necessarily. I mean it
14 influences the market conditions that we assess because --

15 BOARD MEMBER D'AMORE: Sure.

16 MS. KAPACINSKAS: -- we do see kind of the total
17 volume of organic products that are available or organic
18 commodities that are available to American markets, and that
19 naturally influences prices that are able to be commanded by
20 these various growers and producers.

21 But I think inherently we are believers in this
22 framework, and even if prices are somewhat depressed because of
23 some of the fraudulent products that are coming in, we believe
24 very deeply that this framework is necessary and that this
25 provides consumers with a more robust set of choices and a way

1 to ensure that they are getting the food that they kind of
2 align to in terms of their values and in terms of what they're
3 seeking to do for their families and from a health perspective.

4 So I think, you know, does it influence us? Yes,
5 because this is another input for us to understand the market
6 and various market dynamics. This is a very complex global
7 system. But we think that inherently there's value in this
8 framework and there's value in American production.

9 BOARD MEMBER D'AMORE: Great. Thank you very much.

10 MS. KAPACINSKAS: Mm-hmm.

11 CHAIR SMITH: Amy, please go ahead.

12 VICE CHAIR BRUCH: I had a question similar to
13 Jerry's. So just with the interest of time maybe I'll just
14 punt on this one. But thank you so much for lending your voice
15 to this conversation. And I think Jerry's right. We have
16 talked a lot of challenges, but you hit on an excellent note
17 about the belief in the system, so I think there's opportunity
18 here, too. So I appreciate it.

19 MS. KAPACINSKAS: Thanks for all the work you do.

20 CHAIR SMITH: Thanks for being my guest today.

21 MS. KAPACINSKAS: You're welcome.

22 CHAIR SMITH: Okay. I think we are not seeing Kenn
23 Jenkins.

24 So Kenn, if you are on the line, please make yourself
25 known.

1 Otherwise, we will go to Kate Newkirk, then we have
2 Skip Hulett, and then Anne Ross.

3 Hi, Kate.

4 MS. NEWKIRK: Hi.

5 CHAIR SMITH: Just, yeah, state your name and
6 affiliation, and then you can get started. Thank you.

7 MS. NEWKIRK: Good afternoon. Kate Newkirk,
8 International Organic Inspectors Association. I'm an IOIA
9 accredited inspector. I hold a master's degree in agronomy
10 from Virginia Tech. I've worked as a soil scientist and an
11 organic inspector and have also worked in both research and
12 environmental testing laboratories.

13 IOIA finds the instruction documents 2610 and 2611
14 inadequate to meet the testing requirements of 205.403(d)3 or
15 205.670(b) and (c). These two documents and their related
16 document, 2611-1, are specific only to pesticide residue
17 screening. They work very well for periodic pesticide residue
18 testing. However, sampling and testing is a broader issue
19 across the four NOP scopes. Note that testing for glyphosate,
20 one of the most common herbicides, is a specialized test that
21 is not a component listed in 2611-1.

22 IOIA believes that sampling and testing are risk
23 specific. Sampling procedures are dependent on both the matrix
24 being sampled and on the risk being addressed, whether a simple
25 periodic pesticide residue sampling, a suspected prohibited

1 substance application, or determining the extent of a drift
2 event, et cetera.

3 Because sampling and testing are so widely varied and
4 risk dependent, IOIA suggests that scope-specific best
5 practices and SOPs be developed by certifiers in cooperation
6 with the NOP, accredited laboratory personnel, and inspectors.
7 Please refer to the testing criteria process flowchart outlined
8 under additional comments in IOIA's written response.

9 IOIA strongly believes that training is needed not
10 only for inspectors but also for certifiers and reviewers.
11 Training should include laboratory accreditations and selection
12 of labs based on the test method needed. Note, tests for
13 pesticides, GMOs, antibiotics, microbiological, and solvent
14 residues all require either different laboratories or divisions
15 within laboratories.

16 Further training should include documentation and
17 chain of custody requirements, selection of sampling
18 methodology, matrix-dependent sampling requirements, sample
19 refrigeration and shipping requirements, and finally
20 understanding and evaluating test results. Development of best
21 practices and SOPs as well as training will go a long way in
22 verifying organic practices, fostering consumer confidence, and
23 supporting successful legal challenges in cases of fraud.
24 Please note that sampling and testing requires additional time
25 and effort by onsite inspectors, and they should be compensated

1 accordingly.

2 Thank you for your time and attention, and I'll
3 answer any questions you may have.

4 CHAIR SMITH: Thanks so much, Kate. Any questions
5 for Kate? Looks like you have one from Nate.

6 Nate, go ahead.

7 BOARD MEMBER POWELL-PALM: I wish it were a question,
8 but I've waited probably two days now to hear what you just
9 said, that inspectors are on board, and we can do this, and
10 that is a vote of confidence I really appreciate.

11 MS. NEWKIRK: You're welcome.

12 BOARD MEMBER POWELL-PALM: So thank you for your time
13 to speak with us.

14 MS. NEWKIRK: Thank you, Nate.

15 CHAIR SMITH: Thanks so much, Kate. Appreciate your
16 comments.

17 MS. NEWKIRK: Okay.

18 CHAIR SMITH: Okay. We did have Kenn Jenkins. We
19 just didn't get him unmuted in time, so we're going to go back
20 to Kenn. Then we're going to go to Skip Hulett, and then to
21 Anne Ross.

22 So Kenn, are you with us?

23 MR. JENKINS: Yeah. Can you hear me now?

24 CHAIR SMITH: Yes. Sure, can.

25 MR. JENKINS: Okay. Perfect. I'm Kenn Jenkins, and

1 I'm a certified crop advisor working directly with organic
2 farmers focused on traceability. Our network represents
3 organic farmers and processors across 10 states. We believe
4 the biggest threat to organic producers and the credibility of
5 the organic field is fraudulently imported grain, and we
6 believe the only way to stop fraudulent grain is through
7 residue testing of every load.

8 In the U.S., we are losing organic farmers faster
9 than they can be replaced. This is partly due to the fact that
10 the U.S. growers are being held to a higher standard than those
11 outside of our borders, or those transporting questionable
12 grain.

13 The U.S. can supply more organic grains, but the
14 incentives to do so have been jeopardized. All the farms we
15 work with can trace each load right back to the field and the
16 seed used to grow the crop. They go through a transition
17 period where they are likely to break even or carry debt. They
18 battle weeds through tillage, rotation, and walking fields to
19 get the highest quality and cleanest grain, yet imports without
20 the same level of traceability are too often accepted without
21 the same scrutiny.

22 There is a lack of oversight and control in these
23 developing nations that seem to outproduce the U.S. in smaller
24 amounts of acres and with less technology. There are major
25 websites regarding where the USDA should be focusing on

1 enforcement but for some reason choose to ignore it.

2 When the USDA audited India, India lost their organic
3 recognition agreement. We saw a major drop-off in Indian
4 grains being imported, but we also watched those bushels come
5 out of Togo the next year. Why would the USDA not
6 automatically investigate the surge in those operations? Why
7 are we accepting grains from one of the poorest nations in the
8 world where there is a huge food insecurity issue?

9 When the organic standard was still private-sector,
10 the fear to letting the USDA get involved would be all the red
11 tape and trade agreements that would hurt the industry, but the
12 industry decided to turn it over to the USDA because there was
13 a belief that the USDA would protect the label and strengthen
14 enforcement of a government program.

15 In recent consumer surveys discussing the trust in
16 labels, the USDA organic label was still the most trusted, but
17 trust has been declining from the previous survey. The only
18 way to protect the label's credibility and trust, along with
19 protecting the hard work that our organic farmers give, is to
20 test all the grains at the ports for prohibited residue prior
21 to acceptance.

22 In our network, all the farms say the same thing. We
23 do not mind competing as long as it's a level playing field,
24 which we've all heard today many times over. Everybody in a
25 bad actor supply chain is financially profiting from

1 fraudulent, organic grain. Everybody outside of that chain is
2 financially hurt by it.

3 Thank you for the work you're doing, and I look
4 forward to seeing the progress on imported fraudulent grains.

5 CHAIR SMITH: Thanks so much, Kenn.

6 Any questions for Kenn?

7 (No response.)

8 CHAIR SMITH: I'm not seeing any.

9 So, appreciate your being with us today. Thanks so
10 much.

11 MR. JENKINS: Thank you.

12 CHAIR SMITH: Okay. We have next up Skip Hulett,
13 then Anne Ross, then Megan Vaith, although I was told we
14 couldn't find Megan.

15 So Megan, if you're there, please chat in.

16 And, Skip, you can state your name and affiliation
17 and then get started.

18 MR. HULETT: Thank you. My name is Skip Hulett. I'm
19 Vice President and General Counsel at NatureSweet. NatureSweet
20 is an original member of the Organic Produce Association, so
21 I'm speaking today on behalf of OPA.

22 As an organization dedicated solely to representing
23 the organic produce industry, OPA strongly supports the work of
24 NOSB and the National Organic Program as they support a growing
25 and changing organic industry. Our members who are leading

1 figures in the organic produce industry are committed to
2 ensuring steady supply of sustainable, nutritious, and
3 affordable organic produce to meet the demands of consumers.
4 This commitment includes embracing relevant technological
5 advancements and innovation while upholding the rigorous
6 organic standards set by the USDA.

7 So OPA supports USDA's efforts to assist producers as
8 they transition to organics. OPA members have grown organic
9 produce both in ground and in controlled environments for
10 decades. And, as you know, currently produce operations
11 wishing to transition from conventional to organic production
12 must undergo a three-year transition period to ensure the
13 absence of prohibited substances. And as technological
14 advances continue, this three-year transition period is often
15 not reflective of all production methods, some of which
16 inherently have never introduced prohibited substances.

17 So we believe that all growers should be provided
18 with an option to test out of the three-year requirement if all
19 other applicable requirements have been met. To that end, we
20 support an option for all growers to be allowed to apply for
21 and receive an organic certificate with no waiting period if
22 they can demonstrate adequate organic soil health
23 certification, meet an approved soil testing standard, or an
24 alternative if another growing media is used.

25 The test should be carried out by a USDA accredited

1 certifying agent to show no substances prohibited by the
2 National List of Allowed and Prohibited Substances. As a
3 precursor, USDA should begin work with the accredited
4 certifying agents to provide guidance on soil testing
5 procedures to certify that no substances banned on the National
6 List are present.

7 This proposal works towards empowering growers to
8 transition more swiftly and efficiently. It also positions the
9 United States to capitalize on the growing demand for organic
10 products, strengthening our economy through increased
11 agricultural output, job creation, and competitiveness.

12 While OPA understands that this proposal would be a
13 significant shift within the NOP, we also believe that to truly
14 foster a more inclusive, diverse, and equitable organic sector,
15 NOP should consider ways to break down all barriers to organic
16 transition, including the transition period where it's
17 appropriate.

18 In closing, OPA would like to thank the NOSB as well
19 as the NOP for all the dedication and work on behalf of all
20 organic producers, and we certainly look forward to working
21 together to continue efforts to address all barriers to organic
22 transition and production, including any future work on
23 container standards and other issues. So thank you very much.

24 CHAIR SMITH: Yep. Thanks so much, Skip.

25 Any questions for Skip?

1 (No response.)

2 CHAIR SMITH: I don't see any.

3 Thanks so much, Skip, for your comments and for being
4 with us today.

5 MR. HULETT: You're welcome.

6 CHAIR SMITH: Okay. Up next, we have Anne Ross, and
7 then Jaydee Hanson, and then Erin Levine.

8 You can state your name and affiliation and then get
9 started.

10 MS. ROSS: Hey, good afternoon. My name is Anne
11 Ross, and I'm an organic investigator for the Cornucopia
12 Institute and member of the policy team. I'd like to thank the
13 NOSB members for their time here today.

14 I'll briefly address an issue you've already heard a
15 lot about. We need immediate action to ensure that imported
16 organic grain is legitimate. Organic grain farmers continue to
17 tell us that they are experiencing declining prices, forcing
18 many to consider whether they can continue farming.

19 The farmers we talked to are resilient, adaptive, and
20 innovative. They are accustomed to unpredictability, including
21 market fluctuations, but the price pressures they are facing
22 now are getting far too heavy. And again, we must question
23 why. Again, we question whether the playing field is truly
24 level, given the volume of imported grain from countries whose
25 yield data just doesn't make sense. This is the same question

1 we've been asking for years now, and yet again, we are calling
2 for mandatory testing of imports.

3 For example, how can Nigeria, Argentina, and Ghana
4 average hundreds of bushels of organic soybeans per acre, where
5 the data shows U.S. growers typically average significantly
6 less? This can't be true.

7 SOE is supposed to improve supply chain traceability,
8 but we need verification that the traceability requirements are
9 working right now. We cannot stand by silently while the
10 market is flooded with grain that has not been thoroughly
11 vetted. That's why Cornucopia supports legislative action,
12 including those measures advocated by OFA and other groups. We
13 have long called for and continue to support required testing
14 of every bulk shipment of organic feedstuffs arriving at U.S.
15 ports. Imports entering the U.S. by truck and train should
16 also be tested.

17 If SOE is true to an intent to adopt a risk-based
18 approach, testing of every shipment of imported organic grain
19 feedstuffs should be mandatory. The numbers continue to tell
20 the story. If a single ship of cracked corn represents
21 millions of dollars, it's easy to see why verification is
22 critical given the market impact.

23 We know that the majority of organic grain imports
24 are arriving from countries where corruption is common and
25 infrastructure is poor. Logic demands we confirm the

1 legitimacy of these imports where a simple mass balance
2 analysis just doesn't add up. Consumers deserve to know that
3 food bearing the organic label is, in fact, organic. U.S.
4 farmers need the level playing field they deserve.

5 Thank you for serving on this board.

6 CHAIR SMITH: Thanks so much, Anne.

7 Any questions for Anne? It looks like yes, one from
8 Nate.

9 Go ahead, Nate.

10 BOARD MEMBER POWELL-PALM: I just want to say thank
11 you so much for your comments, Anne, and for the tone and tenor
12 that Cornucopia has taken to this issue. I really appreciate
13 the consideration you're giving it.

14 CHAIR SMITH: Thanks so much for being with us, Anne,
15 and for your comments.

16 Okay. Up next is Jaydee Hanson, then Erin Levine,
17 maybe Albert Strauss.

18 Go ahead, Jaydee. You can say your name and
19 affiliation and then get started.

20 MR. HANSON: This is Jaydee Hanson. I am the policy
21 director at the Center for Food Safety, and I will go ahead and
22 start. I want to urge you to begin doing some real work on
23 plastics. The FDA this week finally responded to our petition
24 to get PFAS out of polyethylene fittings for food. And since
25 2016, the Center for Food Safety has been asking the NOSB to

1 exclude bisphenol compounds, ortho-phthalates, and PFAS
2 compounds from food and food contact substances. It is really
3 past time to act on this.

4 I do understand that generally organics hasn't paid
5 attention to plastic wraps on that, but we're having a huge
6 problem with all of these chemicals, and they all -- in that
7 list of bisphenols, PFAS, and ortho-phthalates -- have been
8 found to be endocrine-disrupting chemicals.

9 In my opinion, in our opinion, plastics should be
10 banned by the NOP in many areas where they're ubiquitous and
11 already undermining the organics seal. Some of those are all
12 in the plastic sheetings in fields, and plastics getting into
13 compost, and PFAS and other plastics leaching from containers
14 into the products.

15 And I'll stop there, but I want to urge you to take
16 really seriously that these risks to human health and the
17 environment are going to damage the organic label unless the
18 NOP begins to take strong action. And talk to the organic
19 growers in Maine who unknowingly put on their fields PFAS-
20 contaminated sludge from years ago. And organic farms should
21 not be the next source of plastic pollution that shuts down
22 organic operations.

23 I don't know where I'm at in terms of my minutes, but
24 if I have any time left, I would tell you that the next thing .-
25 I don't have any time left.

1 CHAIR SMITH: No, just at the end there.

2 MR. HANSON: Okay. Thank you.

3 CHAIR SMITH: But hang tight, Jaydee, because you do
4 have a question here from Brian.

5 MR. HANSON: Yep.

6 BOARD MEMBER CALDWELL: Jaydee, thanks a lot for
7 bringing this up in the virtual comments, the issue of
8 plastics. It's something that's really been weighing on my
9 mind a lot more in the last year. What I'm wondering about is
10 whether .. and this may be in your written comments, which I
11 have not read yet, I apologize for that -- but the question in
12 my mind is, would the plastics industry be able to produce
13 plastics that would be functional the way we want them to be
14 without PFAS, phthalates, and bisphenols?

15 MR. HANSON: Yes.

16 BOARD MEMBER CALDWELL: Well, that's a good answer.

17 MR. HANSON: Yeah, I mean there are substitutes for
18 virtually all of these chemicals. These were the easiest way
19 to do it at the time.

20 BOARD MEMBER CALDWELL: Okay. And we wouldn't get
21 into that situation of just replacing one toxic with another
22 toxic? The replacements are actually, you know, known to be
23 benign?

24 MR. HANSON: For the most part. You know, they're --
25 but I mean, we have a problem with organic cheese even because

1 of the ortho-phthalates used in teat cups and in the plastic
2 piping that moves milk to where it's made into cheese. And
3 then you wrap it with another plastic that compounds the
4 problem. But the farms that have switched to vinyl aren't
5 producing ortho-phthalates in their cheese. And there's so far
6 one company that has taken -- one organic company has taken
7 this seriously, and that's Annie's that's owned by General
8 Mills.

9 BOARD MEMBER CALDWELL: Great. Well, thank you so
10 much for that. And I really hope we can move forward and that
11 organics will be a leader in making our plastic situation safer
12 for everybody. So thanks so much.

13 MR. HANSON: We really want the NOP and NOSB to act
14 on its own. We don't want to have to do a legal petition with
15 you like we're doing now with the FDA. Thank you.

16 CHAIR SMITH: One more question for you from Jerry.
17 Please go ahead.

18 BOARD MEMBER D'AMORE: Yeah, hi, Jaydee You went
19 quickly past something that was either FDA or EPA and an
20 involvement that you recently had with them.

21 MR. HANSON: Yeah.

22 BOARD MEMBER D'AMORE: Could you restate that for me,
23 please?

24 MR. HANSON: Yes. The Center for Food Safety and the
25 Environmental Defense Fund and the Environmental Working Group,

1 over a year ago -- maybe two years ago now -- petitioned the
2 FDA to ban some kinds of PFAS in plastic contact substances and
3 to ban them as unapproved food additives because it's illegal
4 to have a food additive that causes cancer, and these
5 substances cause cancer. And they just this week finally said,
6 okay, we are going to go and start to address your petition.
7 It doesn't mean they're saying yes, but it means they're at
8 least starting the legal process to address it.

9 BOARD MEMBER D'AMORE: Thank you for that. And good
10 luck with it. I would recommend that you put full force behind
11 that effort because if you get them to move, you're getting the
12 entire industry to move. So thank you.

13 MR. HANSON: That's why we're bothering them. But,
14 you know, the EPA is the only agency that's really a little bit
15 ahead.

16 BOARD MEMBER D'AMORE: Okay. Good. Thank you, sir.

17 MR. HANSON: Thank you.

18 CHAIR SMITH: Thanks so much, Jaydee.

19 Next up is Erin Levine, then I have Albert Strauss if
20 he's back on, then John Brunquell.

21 Erin, please state your name and affiliation, and
22 then you can get started.

23 MS. LEVINE: Okay. Great. Can you hear me? Great.
24 So I'm Erin Levine. I'm with World Centric. We're
25 manufacturers of third-party certified compostable food ware.

1 And my background is actually in commercial composting in
2 California. I used to sell compost that's approved for organic
3 use into the agricultural community. So this issue is very
4 close to me personally.

5 And I know it's not directly before this group, but
6 my comment today for the Crop Subcommittee Compost Section. It
7 pertains to the BPI petition to the NOP to allow compostable
8 food ware as acceptable feedstock. So I want to express my
9 support for BPI's proposed amendment to the definition of
10 compost from plant and animal material to compost feedstock.

11 I think that permitting food contact products that
12 are certified compostable, meeting ASTM standards and that are
13 verified by third-party certifiers like TUV or CMA or BPI, they
14 allow an opportunity for composters to receive more nitrogen
15 sources, since that food ware acts as a vessel for food scraps
16 and additional carbon sources from the product themselves.

17 I recognize that currently all biopolymers are
18 classified as synthetic, and although they may be synthesized,
19 they break down into natural non-synthetic elements through
20 naturally occurring biological processes that leave no
21 toxicity, and that's all established under the ASTM standards
22 D6400, D6868, and D8410. So the resulting compost feedstock
23 doesn't contain anything synthetic, just natural non-synthetic
24 substances. So if the concern is that anything added to the
25 compost feedstock should be natural, then know that biopolymers

1 do essentially -- they break down into CO2, water, and helium.

2 So communities that have really robust organic -- I'm
3 running out of time, sorry -- compost collection and
4 processing, I have seen success with accepting certified
5 compostable packaging and overall reduction in conventional
6 plastics that truly acts as a contaminant to compost. So food
7 contact products that are non-reusable, non-recyclable, and
8 then are certified compostable, they need an appropriate outlet
9 to aid in waste reduction and to contribute to the whole
10 circular economy.

11 I personally conducted a field test with the
12 compostable field test program, and that's funded by the
13 Compost Research and Education Foundation, and the objective
14 was that to measure how certified compostable products are
15 breaking down in commercial facilities.

16 So and I'll try to move this along, but the end
17 result was that in a desirable timeframe we saw complete
18 disintegration of all the compostable plastics, even the lined
19 paper and fiber products. The liner disintegrated first before
20 the paper and the fiber did. And that's really been a hang-up,
21 especially with the lining piece, because we've had communities
22 that have had food ware and may want alternatives to
23 conventional plastic, and composters that sell their final
24 product as approved organic don't allow these, and so try to
25 drink a hot coffee without a lining. It's just impossible, and

1 people don't want to revert back to conventional plastic.

2 Thank you.

3 CHAIR SMITH: Thanks so much. It looks like you have
4 a question from Allison.

5 MS. LEVINE: Yeah, hi.

6 BOARD MEMBER JOHNSON: Hi, Erin. Thanks for your
7 comments. I've been trying to understand all of the pieces
8 that are coming together on this compost issue, and liners in
9 particular, my understanding was that at least still some
10 compostable products have PFAS in the liners. Can you speak to
11 whether there's a threshold, or if they're not allowed at all
12 under the guidelines that we're considering?

13 MS. LEVINE: Yeah. So if it's certified through one
14 of the third parties I mentioned, they have to go through
15 ASTM's suite of testing, but then additionally to be third-
16 party certified they have to meet under 100 parts per million
17 of intentionally-added PFAS. So it has to be under that 100
18 parts per million which would consider it not intentionally
19 added. Usually if it reads over, that's an indicator that it
20 was in the processing or in the manufacturing. So if it's
21 certified, it has no PFAS.

22 BOARD MEMBER JOHNSON: Thank you.

23 CHAIR SMITH: Brian, please go ahead.

24 BOARD MEMBER CALDWELL: Thanks, Erin. I'm sorry,
25 just very quickly, did you say 100 parts per million?

1 MS. LEVINE: Yes, 100 parts per million of total
2 fluorine is the test for PFAS flourine. Does that answer --

3 BOARD MEMBER CALDWELL: Because, you know, the PFAS
4 standards are in parts per billion or parts per trillion, so
5 we're talking maybe 100,000 parts per billion, right? Those
6 numbers seem very high to me.

7 MS. LEVINE: Mm-hmm.

8 BOARD MEMBER CALDWELL: So and I am -- that's one of
9 the concerns I have is whether a small percentage of these
10 compostable materials may break down visually but may leave
11 residues in the soil that we really don't want to see there.
12 So that's a big question in my mind.

13 MS. LEVINE: Yeah, and I understand that. But to
14 meet the ASCM standard it has to fully biodegrade, so make a
15 full conversion in a 180-day time frame. I know that's a
16 longer time frame than possibly desired for some commercial
17 compost facilities, but it's required to make full
18 biodegradation.

19 BOARD MEMBER CALDWELL: Well, I see that, and I guess
20 it depends on how you evaluate that. A lot of these -- I don't
21 know all the different standards -- but some of them just are
22 talking about a visual disintegration. So PFAS compounds are
23 not going to degrade in a compost pile. Those fluorine bonds,
24 carbon bonds, are very strong, so they're going to be there.

25 And I don't even know about some of the other

1 compounds like the bisphenols and phthalates and those things,
2 but there is concern that the plasticizers and some of the
3 adjuvant type of chemicals that are used to produce plastics --
4 even though they may be 99 percent compostable and sort of
5 benign components -- that that small percentage may really
6 present a problem over the long run. So that's where I'm
7 coming with this.

8 CHAIR SMITH: Mindee, please go ahead.

9 BOARD MEMBER JOHNSON: Oh, honestly, I thought you
10 said that the polymers break down into non-synthetic elements
11 in composting, and CO2, H2O, and something else, and I was
12 wondering if you could link that data for us.

13 MS. LEVINE: Oh, sure.

14 BOARD MEMBER JOHNSON: If you have a study or some
15 information on the specificity of that.

16 MS. LEVINE: Yeah, that's where it's referring to the
17 full biodegradation testing, and they do that in labs. But
18 what's required is to monitor the conversion, which is CO2,
19 organic matter, and really just purely CO2 water. I mean,
20 that's the resulting element. And, yeah, I'm happy to share an
21 ASTM biodegradation test of a certified compostable product
22 because that could really inform this group. I'm happy to push
23 that along.

24 CHAIR SMITH: If that's something that you can share,
25 you can send it to Michelle, and just be aware it will go into

1 the public docket.

2 MS. LEVINE: Okay. Thank you.

3 CHAIR SMITH: You bet. And then you have one more
4 question here from Nate.

5 MS. LEVINE: Oh.

6 BOARD MEMBER POWELL-PALM: Thanks for your comment
7 today. Kind of a larger question on plastics in general. It's
8 could you tell me why we need to be putting this sort of
9 material into our food system? Why can't it go and biodegrade
10 in a dump, in a landfill? Still, it's better than traditional
11 plastics, but why do they have to get so close to what we're
12 going to be ingesting -- especially if there's just one part
13 per trillion PFAS?

14 MS. LEVINE: Yeah, I mean, that's a really valid
15 question. I think, first, that if it comes in contact with
16 food, it's food-soiled. It's already approved for food contact
17 with the FDA. It has a very clear element. I'm not talking
18 about -- I don't think we should have all compostables, like a
19 sneaker or anything else related, only food contact material.
20 That's the first and foremost. And it does help with the
21 overall global warming potential to reduce that because
22 anything going to a landfill can then contribute really to
23 nothing. And also then what happens in a landfill it would
24 just mummify and contribute to our continued landfill problem
25 of excess waste.

1 But in this way, if you produce a product that can go
2 into and become a finished compost and go back into soil, it
3 just can continue to be part of the circular economy. It has a
4 very -- it's designed to be that way because it's derived all
5 from plants. It will be entering back into the system and just
6 continue to close it. That's why.

7 BOARD MEMBER POWELL-PALM: I totally appreciate that
8 sentiment. It seems like when we said we weren't going to have
9 sewage sludge in organics, we sort of made a very similar
10 decision that, yes, it's very circular to have human waste go
11 back, but we said that that is an acute source of
12 contamination. Not to argue with you, but I totally -- and I
13 appreciate your comments today -- but I think it's something
14 for us to consider.

15 MS. LEVINE: Okay. Thank you.

16 BOARD MEMBER POWELL-PALM: Thank you.

17 CHAIR SMITH: Thanks, Erin, for your comments.
18 Appreciate it.

19 Do we have Albert Strauss back? I know he had to
20 perhaps leave and was going to try to come back.

21 MS. ARSENAULT: I don't see Albert back with us yet.

22 CHAIR SMITH: Okay. I'll circle back around to him
23 at the end.

24 What about John Brunquell?

25 MR. BRUNQUELL: Yes, I'm here.

1 CHAIR SMITH: Yay. Okay. Great. One second. Let
2 me just call the rest of the list.

3 Do we have Courtney Lorenz, Robin Olson, or Matthew
4 Fitzgerald? That's the last three commenters, then, that I
5 have for the day. So after John would be Courtney, then Robin,
6 then Matthew.

7 John, you can state your name and affiliation and
8 then get started.

9 MR. BRUNQUELL: I'm Dr. John Brunquell. I'm the
10 founder and CEO of Egg Innovations. Egg Innovations is a
11 leading producer of organic eggs in the United States.
12 Production is primarily in the Midwest. We ship across the
13 United States. Egg Innovations has previously testified to the
14 NOSB on the critical need of keeping the organic symbol the
15 gold standard for consumers as it relates to organic integrity.

16 As we sit here today, there are simply too many
17 certifications we can put on an egg carton. There's too much
18 greenwashing of claims, which is unfortunate. So it falls on
19 the organic community to police and solve these issues.

20 At Egg Innovations, we own an identity-preserved feed
21 mill, and we source organic grain both directly from farmers
22 and, when needed, through grain traders. We attempt to
23 purchase as much as we can locally and then domestically.
24 Having said that, some of our grain does come from imported
25 sources.

1 A couple of key points I'd like to make are certified
2 organic is an incredible opportunity for all producers and
3 consumers. We need to make sure that we have a level playing
4 field for organic grain production so that we can encourage
5 more domestic farmers to grow organic. It's unfortunate that
6 in the U.S.A. we should have to import organic grain at all.
7 The issue I struggle with is grain markets are such that
8 farmers are motivated to produce conventional grain
9 sufficiently that we're a net exporter. And on the organic
10 side, markets are such that we are motivated to produce an
11 insufficient amount of organic grain for the domestic market.
12 This simply needs to change.

13 The first thing we need to do is elevate the testing
14 of imported grains to guarantee the product is pure, the
15 playing field is level for all producers, and this will help
16 encourage the domestic grain farmer to expand organic grain. I
17 find it unfathomable that we can produce an organic soybean in
18 Africa and ship it to an end user in the United States cheaper
19 than we can produce it locally.

20 The organic grain market has incredible potential to
21 grow. Consumers need to be made more aware of the many
22 benefits of organic beyond just being a clean label. While
23 organic market development, OMDG, was a good start for helping
24 launch a growing organic market, we need to put in some more
25 effort to educate the consumer about all the benefits of

1 organic and the value of buying domestically produced product.

2 From organic eggs on the shelf to organic corn grown
3 to feed the chickens, growing the organic market benefits every
4 stakeholder. We need to support the consumer and the domestic
5 supply chain that brings them products. I'm not opposed to
6 imported grains, but I suspect there are some integrity issues
7 of grain coming into a country that allows for foreign grains
8 to be competitive in one of the great bread baskets of the
9 world. Thank you.

10 CHAIR SMITH: Thanks, John. It looks like you have a
11 question from Kim.

12 Kim, please go ahead.

13 BOARD MEMBER HUSEMAN: Hi, John. I appreciate your
14 comments and your lens in how you look at this market space as
15 an end user. I'm curious, given the structure of your
16 business, do you feel like there is pressure on the -- I'll say
17 the elevator or the crusher -- to provide U.S. products
18 competitive to the imported pricing structure of, let's say
19 meal, to the end user in order to get eggs to the market in a
20 competitive fashion?

21 So essentially, I'll try to rephrase that a little
22 bit quicker to say, is there pressure from the end user to bid
23 on domestic products at the same pace as they do the imported
24 products, even though you know that it's a domestic supply
25 versus an imported supply?

1 MR. BRUNQUELL: The simple answer is yes. In our
2 experience across our entire customer base, I've never had a
3 retail customer demand, expect, or specify domestic production.

4 And so it really becomes an economic conversation.
5 Currently, organic soy meal is about \$800 a ton and -- whether
6 it's domestic or imported -- if I'm being offered a choice of
7 \$750 and \$800 and the customer is agnostic, the system is set
8 up to simply buy as to the lowest cost.

9 BOARD MEMBER HUSEMAN: Thank you. And I guess to
10 piggyback on that a little bit, even if they prefer domestic,
11 if you prefer domestic to be able to compete in the space,
12 you're having to go into a pricing structure anyway, maybe not
13 a product structure but a pricing structure to compete.

14 MR. BRUNQUELL: Correct. And I mean we're huge
15 advocates of expanding the farm community in organic grain, but
16 at this point the reality is that organic grain can come into
17 the United States below what domestic farmers feel they can
18 viably produce for, and that's the reason why we're stalled in
19 expanding our capacity.

20 BOARD MEMBER HUSEMAN: Are you able to use other
21 alternative, I'll say, cheaper protein sources to help offset
22 any of your costs?

23 MR. BRUNQUELL: Generally not. In our world, in just
24 the simply physiology of a chicken producing an egg, it's got
25 to have a high protein source and it has to have an energy

1 source, and that would traditionally fall on soy or soy-related
2 products for the protein and corn for the energy.

3 BOARD MEMBER HUSEMAN: Thank you, John. I'll yield
4 to Nate, but I really do appreciate your comments today.

5 MR. BRUNQUELL: Thank you.

6 BOARD MEMBER POWELL-PALM: Kim was faster than me,
7 but I just wanted to like slow clap after that. It was so
8 good. Thank you for those comments.

9 You have nothing to gain for the domestic producers
10 getting a better shake. From my understanding, you're not a
11 corn grower. You're only a buyer. And so what do you think of
12 as, you know, kind of the social contract that we've developed
13 in organic? What do we owe these farmers who have dedicated
14 their lives to building this market, building this base, and
15 how can we as a community have a stronger conversation about
16 thinking of more than just the bottom line? Obviously that's
17 critical and that's going to be the first consideration, but is
18 there a way we can think bigger for what we're trying to value
19 in this system?

20 MR. BRUNQUELL: Thank you for that. That's an
21 excellent question. Our perspective is I have no problem
22 paying more for grain as long as it's a level playing field
23 across the United States. If all of my competitors are in the
24 same environment and that's going to cost me an extra nickel a
25 dozen of cost, I have no problem with that.

1 What we see in the value proposition without -- you
2 know, to be colloquial, my dad always said pigs get fat, hogs
3 get slaughtered -- and everyone in the supply chain has to make
4 money. The farmer has to make money. The manufacturer has to
5 make money. The retailer has to make money. And it has to get
6 to the consumer at an affordable price. And as long as we stay
7 focused on the fact that everyone's entitled to a reasonable
8 profit but we still have to be affordable, then we're starting
9 to build a sustainable community.

10 BOARD MEMBER POWELL-PALM: If I could ask one small
11 follow-up to that. If we had sort of a steady stated, say \$8
12 or \$9 a bushel for corn and \$900 for soybean meal, does that
13 seem like something that -- I know farmers could make money at
14 those levels. Would you be able to make money at those levels?

15 MR. BRUNQUELL: To put it in perspective, two years
16 ago when the India issue arose I was paying \$1500 for soybean
17 meal, and about three years ago I was paying \$14 for corn. So
18 we can make these numbers work.

19 Eventually we simply have to pass it through to the
20 consumer, and when we're talking about, in the case of a dozen
21 organic eggs, it's going to be on the shelf for probably \$4 to
22 \$6 a dozen depending on where you are in the United States, 10,
23 15 cents a dozen really doesn't make a difference. What
24 consumers want is consistency and reliability.

25 BOARD MEMBER POWELL-PALM: It's the mic drop of the

1 day. Thank you so much for your comments. I so appreciate
2 you.

3 MR. BRUNQUELL: Thank you.

4 CHAIR SMITH: Amy, please go ahead.

5 VICE CHAIR BRUCH: Yeah, I guess I should have gone
6 ahead of Nate because I liked how we ended this, John. But
7 thank you for your time and your comments today.

8 Just a quick five-foot off the ground type question,
9 not a 50,000-foot question for you. But quality of the
10 products coming in, you mentioned price -- buyers are looking
11 at price, they're looking at certificates -- the quality of the
12 product stream, from your assessment, is it of equal caliber in
13 general to what's produced in the States?

14 MR. BRUNQUELL: Generally not. It will be highly
15 variable. There's some excellent quality comes in. We
16 individually own the elevator, so what we do is we allow for
17 the ability to blend off, and so we will hold an inventory of
18 domestic that will blend into the import. So in our situation,
19 it's not exclusively one or the other. But when we have
20 quality concerns, we retain high-quality product to blend off
21 to bring the quality to our minimum standards.

22 VICE CHAIR BRUCH: Thank you.

23 CHAIR SMITH: Thanks so much for your comments, John.

24 MR. BRUNQUELL: Thank you.

25 CHAIR SMITH: Okay. I have Matthew Fitzgerald, then

1 Robin Olson. We'll see if Albert joined us back, and that will
2 round us out for the day.

3 So Matthew, are you there?

4 Have we found Matthew?

5 MS. ARSENAULT: He's one -- oh, there we go.

6 CHAIR SMITH: Oh, we got you.

7 MR. FITZGERALD: Very good.

8 CHAIR SMITH: Yeah, state your name and affiliation,
9 and then you can start.

10 MR. FITZGERALD: Good afternoon, Board. My name is
11 Matthew Fitzgerald. I am an organic farmer in Minnesota and
12 the owner of Fitzgerald Organics LLC. It's perhaps a good
13 thing that I'm calling in rather than a Zoom today because I'm
14 covered in dirt and dust from working on a planter, so you
15 don't have to look at my face, you can just hear my words. I'd
16 like to comment on urging the Board to take into consideration
17 additional practices and regulations around the testing of
18 imported grains.

19 Our farm is a 24-year-old organic farm. We started
20 out in the year 2000 with 200 acres and today raise 2,500 acres
21 of organic corn, soybeans, wheat, and peas. In 2023, our on-
22 farm yields averaged 204 bushels an acre in corn, 58 bushels an
23 acre in soybeans, and 75 bushels in wheat.

24 With those 24 years of experience, we consider
25 ourselves to be highly productive, highly efficient, skilled

1 organic grain farmers who are able to be competitive in terms
2 of production with their conventional neighbors, and we take
3 pride in what we do and feel that the organic industry has been
4 a blessing for our family and our ability to support multiple
5 households on a family-sized farm.

6 We support the organic industry through speaking at
7 conferences, consulting other beginning farmers, and assisting
8 farmers transitioning to organic, and we continue to believe in
9 the importance of organics for the American family farm.

10 I urge this Board to consider additional regulations
11 and practices regarding testing imported grain such that
12 domestic farmers like ourselves have an even playing field. I
13 congratulate the Board on the work that you have already done
14 and end my comments by just adding on to the work as we begin
15 on our farm and planting that you will continue your work in
16 helping us raise a successful crop for future years.

17 CHAIR SMITH: Thanks, Matthew.

18 Any questions for Matthew? I'm not seeing -- oh,
19 Nate got in there. Go ahead, Nate.

20 BOARD MEMBER POWELL-PALM: I just want to say thank
21 you so much for taking the time, Matthew, to speak with us.
22 Hearing from farmers -- especially farmers right in the field -
23 - is the best part of this process, and we hear you. You're
24 able to produce some organic grain. We want to help get this
25 market working for all of you farmers, and so we really

1 appreciate the input that you've given us today.

2 CHAIR SMITH: Thanks for getting on here, Matthew.
3 Appreciate your comments.

4 Do we have Robin Olson?

5 MS. HOLM: I don't see Robin online.

6 CHAIR SMITH: And Albert, did he make it back? Oh,
7 wait. I'm being told Robin is on.

8 MS. HOLM: I am not seeing Robin by name or phone
9 number. Albert's not back on. Anyway since we are running
10 late we have to move on.

11 CHAIR SMITH: Okay. I think then that wraps us up
12 today. I just want to say thanks to everybody who provided
13 comments to the Board today. Thanks, everyone, for hanging in
14 45 minutes longer. I didn't do as good today with the time
15 management, so thanks for everybody's patience with all the
16 moving around.

17 And we will reconvene on Monday, April 29th, in
18 Milwaukee, Wisconsin, for the NOSB meeting. We will also have
19 a live broadcast of that meeting, and information is available
20 here on the slide. If you're going to be in Milwaukee, we
21 can't wait to see you, and thanks again for spending the
22 afternoon with us.

23 (Whereupon, at 5:45 p.m., the Webinar was adjourned,
24 to reconvene on Monday, April 29, 2024, at 9:00 a.m. CST.)

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CERTIFICATION

This is to certify that the attached proceeding
before the:

NATIONAL ORGANIC STANDARDS BOARD

IN THE MATTER OF: SPRING 2024 PUBLIC COMMENT WEBINAR

PLACE: ZOOM

DATE: April 25, 2024

was held according to the record, and that this is the
original, complete, true and accurate transcript which has been
compared to the recording accomplished at the hearing.



Elaine M. LaRosee, CDLR
Official Reporter

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UNITED STATES DEPARTMENT OF AGRICULTURE

NATIONAL ORGANIC PROGRAM

NATIONAL ORGANIC STANDARDS BOARD MEETING (NOSB)

SPRING 2024

Monday,

April 29, 2024

Hilton Milwaukee City Center - Arena

Wright Ballroom

9:00 a.m., CST

Day 3

1 National Organic Standards Board (NOSB) Members

2 Kyla Smith, NOSB Chair

3 Amy Bruch, NOSB Vice Chair (Virtual)

4 Nate Lewis, NOSB Secretary

5 Brian Caldwell

6 Jerry D'Amore

7 Carolyn Dimitri

8 Kim Huseman

9 Mindee Jeffery

10 Allison Johnson

11 Dilip Nandwani

12 Nate Powell-Palm

13 Logan Petrey (Virtual)

14 Franklin Quarcoo

15 Wood Turner

16 Javier Zamora (absent)

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USDA/National Organic Program Staff
Dr. Jenny Tucker, NOP Deputy Administrator
Michelle Arsenault, Advisory Committee Specialist
Erin Healy, Director, Standards Division, NOP
Jared Clark, Acting Assistant Director, and
National List Manager, Standards
Andrea Holm, Agricultural Marketing Specialist, Standards
Johanna Mirenda, Agricultural Marketing Specialist,
Standards
Heather Kumar, NOSB Technical Support Staff

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P R O C E E D I N G S

(Time: 9:02 a.m., CST)

CALL TO ORDER

DR. TUCKER: Good morning, everyone. I know they're bringing in more chairs. I'm sure they will do that quietly in the back. In the meantime, if you have an empty seat next to you and would like a new buddy, go ahead and raise your hand and somebody can come sit next to you.

Okay. Good morning, everybody. I'm Jennifer Tucker, Deputy Administrator of the National Organic Program. Welcome to all of our board members and our audience, both in the room and online.

It is my honor to officially open the Spring 2024 National Organic Standards Board meeting. Let's start with some official business. This meeting, like other meetings of the National Organic Standards Board, is being run based on the Federal Advisory Committee Act and the Board's Policy and Procedures Manual. I am your designated federal officer today. Transcripts for all segments will be posted once completed.

Just for a little bit of housekeeping, as we are in a new space together, our restrooms are immediately outside these doors. There are a number of emergency exits on both ends of the hallway. Also, in response to feedback and requests from the community, there are water tanks around the corner, to the

1 right and the right again. So if you have a refillable bottle
2 and would like to not use throwaway plastic, the hotel was
3 gracious in providing that for us. So thank you to them.

4 Let's take a quick look at the agenda and then I will
5 introduce our welcoming speaker, Secretary Randy Romanski, who
6 leads the Wisconsin Department of Agriculture, Trade, and
7 Consumer Protection. After Secretary Romanski speaks, I will
8 introduce the National Organic Program team. Kyla Smith, our
9 new board chair. Yay. Kyla will facilitate board
10 introductions and will lead us through some board reports. We
11 will then do a program update with questions and answers with
12 the Board. After a break, we'll hear from members of the
13 Midwest region of the Transition to Organic Partnership
14 program, or TOPP. We will then spend the afternoon listening
15 to public comments. Thank you to all of you who came to give
16 your testimony.

17 Tomorrow, we'll bring -- begin subcommittee work and
18 hear from a compost panel. Subcommittee work will continue
19 this Wednesday, through Wednesday, and then we will close with
20 board business and a look ahead.

21 Now, I am pleased to introduce our opening speaker,
22 Secretary Randy Romanski, who leads the Wisconsin Department of
23 Agriculture, Trade, and Consumer Protection. Since 2021,
24 Secretary Romanski has led the state agency responsible for
25 promoting the interests of Wisconsin's diverse agricultural,

1 trade, and consumer activities. He has held leadership roles
2 at several state agencies, focusing on issues such as farmland
3 preservation, local foods, farm-to-school, and renewable
4 energy.

5 His experience in agriculture policy and government
6 service also shows his commitment to advancing Wisconsin's
7 agriculture and economic interests. He is advancing the
8 benefits of organic production models and climate smart
9 programs that add value to products to help farmers increase
10 their profits and show the next generation of farmers new and
11 different career opportunities in agriculture.

12 Prior to his current role, the Secretary held
13 leadership positions at the Wisconsin Department of Natural
14 Resources, Wisconsin Department of Transportation, and state
15 legislature. You do get around. He also served as Deputy
16 Chief of Staff in the Governor's Office and as a policy analyst
17 for the Wisconsin Department of Justice.

18 Secretary Romanski earned his bachelor's degree in
19 political science from the University of Wisconsin at River
20 Falls and his master's degree in public policy and
21 administration from the Robert M. LaFollette School of Public
22 Affairs at the University of Wisconsin at Madison.

23 Mr. Secretary, thank you for being here.

24 WELCOMING REMARKS

25 SECRETARY ROMANSKI: Thank you so much, Jennifer, for

1 that kind introduction. I -- when I hear that, I sometimes
2 hear my father's voice ringing in my ears of, well, that guy
3 can't really hold a job for very long, can he? I promise, I
4 can.

5 I am a career public servant, 34 years, all here in
6 the State of Wisconsin. I'm very proud of being a
7 Wisconsinite. You may catch a hint of that during my opening
8 remarks today. So, most importantly, thank you for being here.

9 I know how important it is to move around, and moving
10 around the country, hearing from different people, listening to
11 others, is an important part of how our agency operates. And
12 hopefully, you'll get a little bit of a feel for that as well.

13 This is really more for those who are in the room.
14 We are known as America's Dairyland, but we are really so much
15 more. So, as you're here for a while, please do take advantage
16 of sampling some of our food, fuel, and fiber. And there's
17 lots of opportunities here in this area, so we encourage you to
18 do so.

19 If you are online, you're welcome to visit Wisconsin
20 anytime you'd like. We've got a lot to offer. I promise the
21 Department of Tourism did not encourage me to do that, but they
22 are really good partners, so I'll just put that plug in there.

23 So, a little bit about Wisconsin. Remember I said I
24 was going to be really proud and boast just a little bit, but
25 we've all got things and places to be proud of, so you should

1 share your stories along the way. So, agriculture is an \$104.8
2 billion industry in the State of Wisconsin. As I mentioned,
3 we're known as America's Dairyland. We do produce about 50
4 percent of the United States' specialty cheese, so think about
5 that. There's a reason why people put slices of cheese on
6 their head at Packer games. There's a lot of cheese here, but
7 we also export a lot of it too, so maybe you've seen it on
8 store shelves in your area.

9 So, that's a little bit about our agriculture
10 industry as a whole, but, you know, we are number one. We lead
11 the nation in snap beans for processing, cheese, which I
12 mentioned, cranberries, ginseng, mink pelts, dry whey for
13 humans, milk goats, corn for silage. And we're a top five
14 producer of many other commodities that you like to eat,
15 including potatoes, vegetables, and specialty crops, so there's
16 a lot going on here.

17 Also, probably, we're the number two organic state in
18 the United States. A lot of people don't know that and might
19 not guess that, so it's especially important and prideful for
20 us to be hosting this event here today.

21 Just a few things. According to the 2021 Certified
22 Organics Bulletin from the National Association of National Ag
23 Statistics Service, so this was released in December of '22, we
24 have nearly 250,000 acres of certified organic farmland. We
25 rank first in certified organic cranberry production, total

1 about 66 percent of the nation's organic cranberries, and milk
2 from cows. Had the highest total value of sales for organic
3 commodities in Wisconsin at \$107 million. We produce 23
4 percent of Wisconsin's organic goat milk, and Wisconsin ranked
5 first in certified organic snap beans and fourth in certified
6 maple -- organic maple syrup.

7 So, I guess, you know, I promise I'm going to stop
8 being very proud of my state here in just a minute and get a
9 little bit beyond that. Okay. I saw somebody saying don't,
10 keep going. All right. I'm going to keep going a little bit.
11 I have some guidance from the crowd.

12 But agriculture of all types and sizes is an
13 important part of our state's economy and very likely an
14 important part of the state's economy that you're coming from.
15 No matter where you're coming from, culture plays a role in
16 your economy and I'll say this a couple times. Share your
17 stories and tell others your experience. It's really important
18 for other people to hear that as people get more and more --
19 sorry about that, I talk with my hands. As people get more and
20 more removed from being on the farm, it's important that they
21 hear the stories and they are able to share the experiences
22 that you can offer or that people you work with can offer.
23 Important for them to know where their food, where their fuel,
24 where their fiber comes from, and it's, you know, produced here
25 in the United States.

1 Back to just a short summary of where we're at here.
2 One in nine people in the state of Wisconsin works in a job
3 related to agriculture, and that's a lot. What I would say to
4 that as a follow up is nine in nine of us are consumers and we
5 should know and care about where our food comes from. And we
6 have a great opportunity here in the United States and here in
7 Wisconsin to know our fuel, know our food, know our fiber,
8 because the farmers that produce them or the businesses that
9 are involved are maybe just right down the road and that's
10 pretty cool.

11 What's our role as an agency? DATCP is a resource to
12 the industry all the way along from farm gate to dinner plate.
13 Our agency provides a regulatory component but we also provide
14 a resource component. We educate while we regulate. The
15 process works best when everybody's working together. The
16 farmer, the processor, the inspector, and the consumer all want
17 the same thing: healthy, safe product. And I think as
18 everybody does their part, we all get there together and that's
19 pretty cool too.

20 Through the organic certification cost-share program,
21 organic advisory council, grant programs, our agency works
22 every day to connect the dots with the public and programs that
23 support production, processing, and consumption of organic
24 products. We also do this by advocating for a comprehensive
25 farm bill that maintains the connection between agriculture and

1 food. And Wisconsin, like many other states -- I work very
2 closely with my counterparts from other states, have
3 consistently been advocating, number one, to get a farm bill
4 done and, number, two to make sure that that farm bill is
5 comprehensive and well-funded.

6 You know, I -- I am a -- I'm going to say I am the
7 head of a state agency and there are times where I ask our
8 legislature for resources because it's important that we are
9 able to be a resource to farmers. Our partners at USDA also
10 need to have the resources to be able to make that connection
11 with farmers. We also need to make sure that we keep our
12 feeding programs connected, that farmers have a safety net,
13 we're investing in research. There's a lot that needs to be
14 done as part of a farm bill. I know that takes time, but it is
15 really important to our state, to our nation.

16 I talk about connecting the dots, too. You know, I
17 am really fortunate to work for a governor who understands and
18 invests in agriculture as an industry and as part of the
19 economy. Governor Tony Evers has consistently supported all
20 levels of agriculture, big, medium and small. We need them all
21 to be successful, all types, all sizes. And through this
22 leadership we've strengthened relationships and increased
23 investments in our agriculture industry. So, that's important
24 as we look forward, no matter where we're from and you've been
25 very patient enduring my Wisconsin fun here and so that's

1 great.

2 But what I would say, again, is no matter where
3 you're from, no matter what part of the industry you're engaged
4 with, how you connect to the people who grow the product, maybe
5 you are somebody who's growing the product, you've got a lot to
6 be proud of. You know, feeding your neighbors, feeding your
7 state, feeding the nation, the world, is a really important
8 process and very valuable obviously for those of us who are not
9 with our hands in the soil. So be proud of that. Again, share
10 your story, share your experiences with others so they know the
11 value you bring every day.

12 I just wanted to close on one thing and it's
13 something that I typically do close with this no matter who I
14 talk to and that's the importance of kind of being aware of
15 each other and how we can take care of each other. Even in
16 good times, agriculture and food production can be tough.
17 There are a lot of challenges that are around us all. So,
18 changing weather patterns which we continue to see, we have
19 challenging markets whether it's local or international, and
20 volatile prices which can have an impact on farmers and people
21 in the industry and that can be a lot. And so, it's important
22 that we are providing resources to farmers to be a partner.

23 And since the mid-1980s, Wisconsin's Farm Center has
24 been that partner at a time to help farmers out at a time where
25 they are experiencing challenges. They provide a variety of

1 resources: everything from mediation to transition management
2 to consulting with farmers for business plans. But we've added
3 some new programs in the recent years that I tend to end with
4 because I know other states also have similar programs and
5 that's our farmer mental health and farmer wellness programs.

6 Getting back to the fact, agriculture is a challenge
7 even in good times. When you experience all these things
8 together, we want to make sure that people have a resource,
9 that farmers have a resource, some place that they can go. And
10 so if somebody's struggling with hardships, depression,
11 anxiety, we have a 24/7 hotline that's available for farmers to
12 call. We want people to know the resource is available. We're
13 not telling them they have to call, but we encourage other
14 people to share that number with those who might need it. And
15 I'm going to say it. It's on our website, but for those who
16 are interested, the farmer wellness helpline is (888) 901-2558.

17 Again, many of your states and the states you come
18 from have similar programs. It's a really important resource
19 that our agency makes available because we want farmers to know
20 that it's okay to make the call and there's somebody there who
21 can be a friendly voice at a time that they might need it.

22 So, I will end with that and just say once again,
23 thank you for being here. Thanks for everything that you do,
24 wherever you're coming from. And again, because my friends at
25 the Department of Tourism would say this, feel free to spend

1 some money in downtown Milwaukee or wherever else you go.

2 So again, I really appreciate being here with you.
3 I'm going to try and squeeze in the back and listen in for a
4 while because we have the great resource of you all being here,
5 so I'm going to learn a little bit. I'm going to have to take
6 off in a little while, but I do welcome you all here and I hope
7 you have a great meeting. Thanks.

8 AGENDA OVERVIEW, NOP INTRODUCTIONS

9 DR. TUCKER: Okay. I have been told I project, so I
10 am not going to be as close to the mic as usual and if you
11 can't hear me, just go like this. Though I guess the chances
12 of people not being able to hear me are fairly low from what I
13 understand.

14 Okay. So, now, we're going to continue our opening
15 with my introduction of the National Organic Program team.
16 We have several folks with us here today.

17 First, I want to take a little bit of time to thank
18 and acknowledge Michelle Arsenault, our Advisory Board
19 Specialist. Okay. So wait until you hear this. This is
20 Michelle's 24th meeting supporting this community, and that's
21 pretty incredible. So, actually, let's do a little bit in the
22 audience.

23 How many of you have been to 24 or more meetings?
24 Wow, okay. So Michelle's got a lot of you beat. So pretty
25 impressive there.

1 So to celebrate two dozen meetings, two dozen
2 meetings, we have 24 Justin Organic Peanut Butter Cups because
3 apparently that's her favorite. So, Michelle.

4 UNIDENTIFIED: No requirement to share.

5 DR. TUCKER: All right. So, thank you and
6 congratulations. Michelle, by the way, was my very first hire
7 when I joined the government. And so, we've been together a
8 long time. So Michelle, thank you for everything.

9 So, okay. We also have a number of other team
10 members from Standards. Erin Healy, our Standards Division
11 Director; you're going to be hearing more from her in a bit.

12 Jared Clark, where are you, Jared? There you go.
13 Jared is our Acting Assistant Standards Director.

14 We have Andrea Holm who kind of runs the place back
15 there. So she's making sure all of our online folks are well
16 taken care of.

17 And Jo Miranda, where are you, front row? Okay. Jo
18 has been doing a fabulous job. Most recently she updated, was
19 the project manager for the NOP Handbook update. So if you saw
20 an Insider on that, Jo was the project manager on that.

21 And then right next to her, we have Heather Kumar who
22 is a food technologist supporting the technical assistance
23 needs of the board. And so that's a new position. It's been a
24 fabulous six-month learning and growing period there. So
25 Heather, thank you for all your work on that.

1 All of these folks are vital to the board's work in
2 advancing both practice and nationalist standards, so. Also
3 here in Milwaukee we have Penny Zuck, Alexis McInerney, and
4 Rebecca Claypool with the Office of the Deputy Administrator
5 team, and Emily Gantz who is an Accreditation Manager. All of
6 these folks have played a key role in getting ready for the
7 meeting and are playing a critical role in managing the
8 Transition to Organic Partnership Program or TOPP,
9 working directly with the regions and our national level
10 cooperating groups. So Emily Gantz is the project manager for
11 the Midwest TOPP region that we'll be hearing more from today.
12 All these folks do the hard behind-the-scenes work that goes
13 along with successfully running a \$100 million transition
14 program. It's an honor to work with all of them.

15 So next I'm going to turn the mic over to Kyla Smith
16 who's our board chair. Congratulations, Kyla. Kyla will be
17 having the board members introduce themselves. All of these
18 folks devote hours and hours of volunteer time to serve the
19 organic community. So let's give the full board a big round of
20 applause, thanks, and appreciation.

21 So Kyla, welcome to your new role as chair. Thank
22 you in advance for a great meeting.

23 NOSB INTRODUCTIONS

24 CHAIR SMITH: Okay. Good morning everybody. Thanks
25 for joining us here in the room and out there in Zoomland. We

1 actually have two board members joining us today on Zoom: Amy
2 Bruch and Logan Petrey. They're home, fulfilling their most
3 important roles as moms. And thankfully because we are so tech
4 savvy now on the board, we are able to have them join us
5 remotely.

6 We will start by having board members introduce
7 themselves. We'll start with Kim and just go around the table
8 to say, you know, your name, seat, location, all, you know, the
9 normal stuff. Go ahead, Kim.

10 BOARD MEMBER HUSEMAN: Hi, Kimberly Huseman. I sit
11 in a handler's seat. I am what they call a super senior this
12 year in my fifth year on the board. I have -- my background is
13 in poultry feeding and most recently, in organic oil seed crush
14 and oils and protein products.

15 BOARD MEMBER POWELL-PALM: Good morning, everybody.
16 My name is Nate Powell-Palm. I sit in one of the producer's
17 seats. I'm a grain and beef cattle producer from Montana and
18 I, too, am a super senior. I'm really enjoying my time
19 watching the leadership pipeline develop beautifully. So
20 grateful to be with you all today.

21 BOARD MEMBER NANDWANI: Good morning. My name is
22 Dilip Nandwani. I have just completed two years on the board.
23 It's a great group. A lot of learning, of course, and I serve
24 on the scientist seat on the board. Thank you. Glad to be
25 here.

1 BOARD MEMBER QUARCOO: My name is Franklin Quarcoo.
2 I serve on the environmental protection and resource
3 conservation seat. I'm an entomologist by training and I work
4 at Tuskegee University. Thank you.

5 SECRETARY LEWIS: I'm Nate Lewis from Olympia,
6 Washington. I work with the Washington Farmland Trust and
7 serve in the resource conservation seat. I also chair the
8 policy development subcommittee and I think that's it. And I'm
9 on the -- and I'm the secretary.

10 BOARD MEMBER JOHNSON: Good morning. I'm Allison
11 Johnson. I'm in the public interest consumer seat. I'm an
12 attorney for the Natural Resources Defense Council and recently
13 moved on to our pollinators and pesticides team, so doing a lot
14 of work to reduce neonicotinoid seed treatments primarily.
15 Looking forward to being with you all here and I'm based in
16 Oakland, California.

17 BOARD MEMBER CALDWELL: Good morning, everybody. I'm
18 Brian Caldwell. I'm in a consumer public interest seat on the
19 board in my second to last year. I'm retired from Cornell
20 University where I did research on organic farming. I was
21 lucky to be able to do that there and located in central New
22 York. And I had a small certified organic fruit and nut farm.

23 Closer? Okay. Usually, I'm so loud. Certified
24 organic fruit and nut farm, certified since 1986.

25 BOARD MEMBER D'AMORE: Good morning. Jerry D'Amore

1 from Monterey, California. I am in a handler's seat. I have
2 51 years of active involvement in food production and sales,
3 all of that in specialty crops and all of the production side
4 in hydroponic systems. I've been 15 in -- for 15 of those
5 years, I was active as a resident in the countries of Saudi
6 Arabia, Turkey, Ukraine, Romania, Bulgaria, and Russia. And
7 the last 20 years have been exclusively devoted to the go-to-
8 market side of the business. Thank you.

9 BOARD MEMBER DIMITRI: Good morning. I'm Carolyn
10 Dimitri. I also sit in a consumer public interest seat. We're
11 all in this little corner. I'm an applied economist on the
12 faculty of New York University and one of my main research
13 areas is the post-farm issues of the organic sector.

14 BOARD MEMBER TURNER: Hi. I'm Wood Turner, head of
15 impact for agriculture capital and trained as environmental
16 designer and planner. I'm in my last year on the board as
17 well. We're a large producer of organic blueberries on the
18 west coast. I'm also anticipating completing transition of my
19 family's farm to organic in eastern North Carolina this year.

20 UNIDENTIFIED: Congratulations, Wood. Cool.

21 BOARD MEMBER JEFFERY: Hello, good morning. Mindee
22 Jeffery. I sit in the retailer seat, Mother Earth Natural
23 Foods in northern California and I'm very proud to have been
24 released from 15 years of direct consumer education on organic
25 and now they let me drive the tractor and I make compost.

1 CHAIR SMITH: Amy, can you please introduce yourself?

2 BOARD MEMBER BRUCH: Yeah, absolutely. Can you hear
3 me okay?

4 CHAIR SMITH: Sure can.

5 BOARD MEMBER BRUCH: Okay. Good morning. I'm Amy
6 Bruch, sixth generation farmer. Currently, I reside in a
7 farmer's seat. I also serve as vice chair and chair of the
8 CACS subcommittee. I'm in my fourth year or I guess senior
9 year and I reside in east central Nebraska.

10 I have an ag engineering degree from Iowa State and
11 not 51 years of experience, I heard Jerry say, but about two
12 decades of experience working in production ag, agribusiness,
13 and consulting fellow farmers transitioning to organic. I
14 lived in Brazil for six years along with my husband. I've
15 worked on many projects internationally in South America,
16 Africa, and Europe as well. And with the passing of my father
17 and the desire to keep the family farm in my family, my primary
18 job and favorite job is farmer on my family farms, and we grow
19 organic row crops and also small grains and we're 100 percent
20 organic or transition to organic. Thank you.

21 CHAIR SMITH: Thanks, Amy.

22 Logan, can you please introduce yourself?

23 BOARD MEMBER PETREY: Hi, can you hear me?

24 CHAIR SMITH: Yep.

25 BOARD MEMBER PETREY: Okay. Great. Hi, I'm Logan

1 Petrey. I am in the farmer's seat and my experience is in
2 organic vegetables, do have some experience in organic grains.
3 I'm from the southeast. I'm in my fourth year. Also, this is
4 my first year as the crops chair.

5 My son was born last month, so I'm very grateful that
6 I can join virtually. It's good to see you all. Thank you.

7 CHAIR SMITH: Thanks. And my name is Kyla Smith. I
8 am the certification policy advisor at PCO. PCO is an
9 accredited certification agency. I've worked in certification
10 for over 20 years. I am obviously serving in the certifier
11 seat. I'm in my fourth year as well, and I'm just very humbled
12 to be serving as the chair of this awesome team. And I call
13 home, State College, Pennsylvania. I will now turn it over to
14 NOSB secretary, Nate Lewis, to give the secretary's report.

15 SECRETARY'S REPORT

16 SECRETARY LEWIS: Thanks, Kyla. Board members were
17 given a copy of the meeting minutes and summary, a draft copy,
18 prior to the meeting. Are there any corrections noted that
19 needed to be made? All right. Absence of any corrections, the
20 meeting minutes are accepted.

21 NOSB REPORT

22 CHAIR SMITH: Thanks, Nate. I will now give a few
23 remarks before I turn it back over to Jenny for the NOP update.

24 In reflecting about what I wanted to talk about this
25 morning, I realize I'm having a bit of a full-circle moment

1 here at this spring meeting. I attended my first NOSB meeting
2 in Madison, Wisconsin in the fall of 2010. I remember so many
3 great things about that meeting, although it did start off a
4 bit rough as I was told on the plane coming to the meeting by
5 my supervisor that she had signed me up to give an oral public
6 comment. To say I was terrified is an understatement.

7 However, I also remember being supported by a group
8 of organic rockstar certification women that coached me through
9 the process. There were songs during public comment, friendly
10 amendments, shouts of joy from the audience when certain votes
11 were taking place. It was awesome.

12 During that meeting, it became clear to me that I
13 wanted to be on that board when I grew up one day. I enjoyed
14 the debate and getting to -- and knowing that, albeit a slow
15 process, that this was how to affect change in organic
16 regulations and have an impact on the organic industry as a
17 whole. So, I return here to Wisconsin, now serving as chair of
18 the NOSB, and I'm so honored to represent my fellow certifiers
19 in this way.

20 As I said, I've worked my entire 20-plus year career
21 in the organic industry at PCO. PCO is a non-profit with a
22 board, so I have quite a bit of experience with boards in that
23 context. Over the years, I participated in multiple board
24 trainings. One of the most important things that I've picked
25 up on is the idea about having healthy and respectful debate,

1 but once the vote is taken, that the board speak in one voice
2 about the decision, whether that was the outcome that an
3 individual member wanted or not. This is to ensure a
4 successful and healthy organization for the long term.

5 Now, I know that this is slightly different than a
6 non-profit board, but in this area, I think the same idea holds
7 true. Obviously, we are debating in the public eye versus
8 behind closed doors, so the public hears the minority view and
9 knows how we all vote, and it can be easy to complain or air
10 one's grievances. However, in the long run, in my experience,
11 it is harmful to the organization. So, I encourage us all to
12 speak together after votes are cast, to successfully implement
13 the actions of this board. I say this because we have some
14 items coming on our work agenda where I guarantee we are not
15 all going to agree. And, for this iteration of the board, this
16 is a little new. Most of the votes that we've taken have been
17 unanimous or pretty unanimous.

18 We've proven over the years as a community that when
19 we pull together, we have a much greater impact to get rules
20 across the finish line. Organic livestock, organic livestock
21 and poultry standards and strengthening organic enforcement
22 final rules are all examples of the board and, quite frankly,
23 the entire community rowing together. It doesn't go unnoticed
24 by the NOP or the greater USDA. In my experience, when we are
25 divided and are asking for different things, the opposite is

1 true. USDA doesn't take us seriously, and their attention
2 shifts elsewhere.

3 Now, don't get me wrong. I'm not saying that once a
4 vote is taken that we can never revisit a topic. We certainly
5 can, and we do. New information presents itself all the time,
6 and we need to reassess policies that are no longer working
7 upon receipt of this new information. But, in the moment, in
8 my experience, more harm than good happens when boards don't
9 rally together around the action or idea that passed the vote.

10 I'm going to do like an awkward transition here
11 because I couldn't think of a smooth one, and I'm just going to
12 talk about the current rulemaking efforts, so, sorry. Anyway,
13 I wanted to take a moment just to acknowledge the incredible
14 work that has happened over the past year with the ongoing --
15 and the ongoing work by all of us in this room to implement
16 three rules simultaneously. Like, three big rules, not just
17 National List rules. I don't think in the history of the
18 Organic Program, that has ever happened.

19 We are making history here, folks, and it is no small
20 feat. We are all holding a lot right now, and while there is
21 plenty to celebrate, I also hope that we don't get into the
22 habit of doing this all the time. It can -- and that we can
23 somehow get to a more steady state of rulemaking versus, you
24 know, nothing for ten years, and then three rules, bang, bang,
25 bang. I know that that is sometimes -- a bit outside of any of

1 our control, really, and if progress can be made to pace things
2 out a bit more, I know the certification community would be
3 eternally grateful.

4 With the rules in various stages of implementation
5 and enforcement, we are doing some things well. I'm sure we're
6 making mistakes, and we are learning a lot. Jenny always says,
7 success brings new problems or questions, and so, in the
8 success of implementing these rules, we now have a bunch of new
9 things to figure out.

10 I encourage us all to stay curious and get creative
11 as we are moving into the enforcement phase of these rulemaking
12 efforts. It might be tempting to jump to the next thing, and
13 it is important to stay engaged through this part of the
14 rulemaking process to ensure consistency. I look forward to
15 hearing more from the program during their update on early wins
16 and next steps.

17 Lastly, I wanted to call your attention to the NOSB
18 call for nominations that is hitting the Federal Register
19 today, I believe. We are seeking to fill the seats that will
20 be vacated by Nate Powell-Palm, Mindee Jeffery, Kim Huseman,
21 Jerry D'Amore, and Wood Turner. The seat designations are one
22 farmer, one retailer, two handlers, and one environmental
23 resource conservation person.

24 Please consider joining our crew. I'm not going to
25 lie, it is a lot of work, and it is so very rewarding. We are

1 also about to go into this time of like super quick turnover on
2 the board, and so, I encourage those that are seeking to apply
3 to like just get in the mindset of being a quick study. That
4 said, there will -- there is always a lot of support from
5 fellow board members and the program.

6 Again, I'm not trying to dissuade anybody from this
7 awesome role. I'm just trying to present a realistic picture
8 so you know what you're signing up for. Please come talk to us
9 about what our experiences are and what the time commitment
10 looks like or reach out to Michelle. I'm sure any of us would
11 be more than willing to, yeah, talk about it.

12 Okay. To wrap it up, I just wanted to acknowledge
13 that this afternoon we are going to be returning to in-person
14 comments for the first time since the pandemic. None of the
15 current board members have ever done this before and the
16 logistics are a bit different with live streaming and board
17 members on Zoom, so please bear with us and give us grace as
18 humans, as I'm sure there will be stumbles along the way.

19 I look forward to spending the next few days with you
20 all and to a successful meeting. Before I turn it back over to
21 Deputy Administrator Tucker for the NLP update, I will hand it
22 over to NOSB Vice-Chair Amy Bruch to make a few remarks.

23 VICE-CHAIR REMARKS

24 VICE-CHAIR BRUCH: Thank you, Kyla. Welcome, fellow
25 board members, NLP leadership and staff, members of the organic

1 community, and all others, to the Midwest. Before I begin, I
2 want to take a moment and acknowledge those impacted by the
3 nearly 130 devastating tornadoes that hit over the weekend in
4 the heartland. My heart goes out to those whose lives changed
5 in seconds.

6 Although I miss seeing you all in person, I'm so
7 grateful to have the opportunity to attend this event
8 virtually. As Kyla mentioned, four weeks ago, I welcomed a
9 beautiful baby boy into my life, and I'm cherishing every
10 moment with my growing family.

11 I was deeply moved by the most recent round of public
12 comments. Your voices as stakeholders have made a significant
13 impact. We hear you and are committed to progressing on the
14 issues within our oversight, impacting our community. For the
15 challenges that fall outside the board's scope of work, I
16 encourage the leaders of various organic organizations to take
17 up the cause.

18 I strongly urge support in filling the Organic Policy
19 Advisor position, which acts as a liaison between our organic
20 community and the U.S. Secretary of Ag. This essential
21 position must be filled and will keep -- will help keep organic
22 at the forefront of advancement. Having a diverse range of
23 perspectives is not just important, but essential, as we work
24 towards solutions to accomplish our common goals. Your unique
25 viewpoints and experiences enrich our discussions and help us

1 to find more comprehensive solutions.

2 Organic farming is not just a production methodology,
3 it's a way of life, a livelihood, an answer, and a choice for
4 many people. As Mindee Jeffery, a fellow board member, so
5 eloquently states, the National Organic Program demonstrates
6 democracy at its finest. Thank you for your attention and
7 commitment to organics, and I look forward to a productive next
8 three days. So grateful to serve with all of you. Thank you.
9 And, with that, I'm going to pass it back to Dr. Jenny Tucker.

10 USDA/AMS/NATIONAL ORGANIC PROGRAM UPDATE, AND NOP-NOSB Q&A

11 DR. TUCKER: Okay, everyone. We're going to do the
12 NOP update a little bit differently this time. I'm going to be
13 introducing Erin Healy in a couple of minutes here. She's our
14 Standards Director, and she's going to give an overview of the
15 Retailer Toolkit. And so there are items out in the hall for
16 folks who want to take a look at the touch and feel of the
17 toolkit.

18 I wanted to kind of connect the dots back to feedback
19 from this community over the past several meetings about this
20 ongoing need to educate people about what organic is and what
21 it means. And I think this team has done a really nice job of
22 capturing the essence from the NOP's perspective on the key
23 elements that we want retailers and consumers to really
24 understand about organic. There are a lot of folks who are
25 working on these types of projects to educate consumers about

1 organic, and I think this package is a nice addition to that.

2 So I wanted to take the opportunity to thank Erin and
3 her team. This is something we've wanted to do for a long
4 time, and the timing was finally right to do it, to get the
5 word out about SOE, the power of SOE, and its potential that I
6 don't think we have fully quite realized yet. And so I want to
7 thank Erin. Right time, right place, right message.

8 An amazing team. You pulled together a beautiful
9 team, lots of good project management, and got this out the
10 door. So, congratulations, and thank you for all the work.

11 This is also the team that has been churning out all
12 of these roles. So the standards group is really just a
13 remarkable set of very, very talented folks, led by a very
14 talented director. So Erin, thank you very, very much. Take
15 the floor, and then we will do Q&A with the board, and then
16 I'll give a separate update primarily about SOE.

17 NOP UPDATE

18 MS. HEALY: Thank you. Good morning, everyone. Can
19 you hear me okay? And I do see people standing in the back, so
20 in case you're just being polite, please do feel free to go
21 grab a seat. You're not disrupting anything, so I just wanted
22 to give you the permission to do that in case you're feeling
23 like you didn't want to disrupt anything.

24 So, let me see, my slides. Point it towards you
25 guys, or okay. So the label landscape has become really

1 confusing for consumers. Even myself, I work in this industry,
2 and when I go to the grocery store, I feel overwhelmed by the
3 amount of labels that are presented to me. So you can imagine
4 for somebody that doesn't work in this industry, how confusing
5 it must be to try to understand what all of these different
6 labels mean, and what's behind each of these labels.

7 So there is -- there's a lot of consumer confusion.
8 There's distrust among consumers. They don't know which label
9 to trust, or how to trust. So we've -- we looked into a lot of
10 consumer research, specifically around organic perspectives and
11 the organic label.

12 And I do want to give a shout-out to a few people
13 that are here today, that were on this very small, but mighty,
14 team that we assembled. So Jo Miranda, in her tiny little bit
15 of free time from doing rules and the handbook update, was also
16 involved in this project. And Alexis McInerney, who is also
17 here today. And Sonya Backus, who's not here today, but is
18 part of the NOP team. So we were only four people doing this
19 in our little bit of free time, and so I just want to give them
20 a shout-out to all the hard work that they put into this.

21 So, you probably cannot see this slide. I think only
22 the people online can see this. But we did work with Consumer
23 Reports, and we were lucky enough that they actually did a
24 phone survey for us among 2,000 people, to ask about the
25 organic label, to get a sense of what people already

1 understand, and what questions they have about the organic
2 label. It turns out that only 55 percent of respondents knew
3 that organic food is produced without chemical fertilizers or
4 pesticides, and only 40 percent knew that organic operations
5 were inspected regularly. Only 34 percent knew that organic
6 animals may not receive growth hormones.

7 The same Consumer Reports survey indicated that 29
8 percent of the respondents answered that they trusted the
9 organic label either a lot or completely. Since then, OTA has
10 come out with another Consumer Attitudes report, or Attitudes
11 and Survey Report, and some of these numbers are higher, which
12 was -- I was very happy to see. But it's -- it does show that
13 there's still a lot of room, I mean, a lot of room for
14 improvement and a lot of work that we have to do to educate
15 consumers about what this means and why our organic label is so
16 special and so important.

17 Again, you probably won't be able to see this slide,
18 but these are the questions that the respondents from the
19 Consumer Reports survey had about the organic label. And a lot
20 of them were asking, almost 50 percent, were asking, who is
21 responsible for making sure that the organic seal on foods are
22 truly organic? So almost 50 percent didn't even know that it
23 was a government-backed label, which I thought was really
24 interesting.

25 As I mentioned, the OTA has done a most recent report

1 this year. They released the findings of their most recent
2 Consumer Attitudes and Beliefs Survey. I was happy to see that
3 the results were better than the Consumer Report was.

4 In the OTA survey, 70 percent of respondents
5 understood that products are produced without synthetic
6 chemicals and do not contain antibiotics or hormones. However,
7 only 60 percent knew that organic prohibits GMOs and less than
8 50 percent knew that organic animals have access to the
9 outdoors. The organic label had fairly good visibility among
10 these respondents, but less than 40 percent of shoppers say
11 they highly trusted the organic label. So they may have said
12 they trusted it, but it was lower for saying that they highly
13 trusted us.

14 Now, we know how great the label is, so I wanted to
15 make sure that we were sharing this information with consumers.
16 We've heard through multiple meetings at this point from all of
17 you and the stakeholders that there is a need to educate
18 consumers about what the organic label means and what's behind
19 the label. So we wanted to make sure what we did -- we put
20 together this toolkit, and this toolkit is ultimately for
21 retailers, that's our audience. The end audience is consumers.

22 So if you are working with any retailers or organic
23 brands, I'll talk a little bit more about how you can help us
24 promote this toolkit, but I first want to walk through what the
25 toolkit is, what it contains, and you'll see some of these

1 pieces are displayed out on the table outside as well. So the
2 toolkit is a variety of graphics that can be printed and used
3 in stores as signs, or they can be used online or in social
4 media as well. So that's why I said they could be used by
5 either retailers or brands, because brands could help by maybe
6 putting it on some of their packaging, or using it in their
7 social media, or on their website to educate consumers.

8 All of these materials focus on the four pillars of
9 organic. This is the main part of our messaging, that the
10 organic label includes four main pillars. The first is
11 protected by law. The second is inspected by experts. The
12 third is traced from farm to store, and the fourth is shaped by
13 public input. And I'll go into more depth on each of these
14 pillars in a minute.

15 So protected by law; we're the only government-backed
16 label on the shelves. It refers to the fact that our label is
17 backed by federal regulations, and we also have the authority
18 to enforce those regulations. So we can levy fines and
19 penalties, and we can even put people in jail if they break the
20 law, and they don't -- they use the organic seal without
21 following our guidelines. Our seal is now trademarked, so we
22 have increased authority to take enforcement action if anyone
23 is fraudulently using the seal.

24 The second pillar inspected by experts; this refers
25 to the inspectors that go out to the farm at least yearly and

1 actually inspect the organic operations. It also infers the
2 unannounced inspections and the testing that happens.

3 We used experts because we were trying to use plain
4 language. We did not want to say certifiers or auditors
5 because we wanted to make sure that the regular consumer
6 understood what we were talking about, and we were focusing
7 really high-level, big picture, on what this meant. So we
8 didn't want to use words that maybe only us in this community
9 were familiar with, but the regular consumer may not be
10 familiar with.

11 The third is really referring to the most recent
12 Strengthening Organic Enforcement regulation, which gives us
13 the authority to audit the entire organic supply chain at this
14 point. So that's why we say traced from farm to store. And it
15 gives us the authority to deter and detect fraud via the
16 certifiers.

17 And then finally, shaped by public input, we wanted
18 to talk about our public-private partnerships. So this meeting
19 is an example of that. Twice a year, we hold a public meeting,
20 and anyone from the public can make a public comment, either
21 verbally or in writing.

22 In addition to that, when we write our proposed
23 regulations, anyone can make a comment, and that really does
24 shape our final regulations. We read through every single
25 comment. We have multiple people that analyze those comments

1 and consider them and talk at length, internally, about how to
2 incorporate that into a final rule.

3 And here are just some examples that I'll run
4 through. These are all on the table outside, if you'd like to
5 take one. They all have a QR code that goes back to our
6 consumer-facing website that explains in a little bit more
7 detail what each of these four pillars means. And it has a lot
8 of hyperlinks for the people that want to go down that rabbit
9 hole and find out everything there is to know about the organic
10 program.

11 So this is a freezer cling that can go on a fridge or
12 freezer door. These are aisle banners. You can see on the
13 right the picture of how it would pop out from a shelf in a
14 grocery store. You can see we have a lot of different pictures
15 to really showcase the diversity of the organic producers and
16 the different consumers that come to stores and may want to
17 look for organic produce and products in different parts of the
18 country. This is a banner that could be hung from a ceiling,
19 for instance, above a -- an organic produce stand. And these
20 are the different shelf tags that could be used in different
21 parts of the store to highlight specific types of food.

22 We used the rule of three here because we didn't
23 think anyone was going to remember more than three bullet
24 points. And we wanted to make sure, again, we were using plain
25 language and keeping it really big picture, high level, and not

1 getting too technical. So these are not going to be perfect.
2 I have heard, you know, oh, but this word and that word and
3 saying it like that. And I understand. And we will never be
4 able to get fully to the level of perfection with some of these
5 words but we wanted to stay true to our regulations and our
6 statute and also, most importantly, be understood by the
7 regular consumer. This is what could be used online and in
8 social media.

9 So here's how you can help us. We need brand
10 ambassadors. So, you are all brand ambassadors in this room
11 and we need you to speak very highly and positively about the
12 organic label. As I mentioned, if you work with organic brands
13 or you work with retailers at all, please tell them about this
14 retailer toolkit. It's downloadable from our website. You can
15 use the QR code from -- you can click it right here or from
16 any of the materials that are on the table. Please send that
17 to the people you're working with. Let them know that you want
18 to see this in stores and you think it will help organic
19 products earn more money. It'll help more organic producers
20 earn more money if people understood what the organic label
21 means and what was behind the label. Thank you. That's all I
22 have.

23 CHAIR SMITH: Thanks so much, Erin. Questions for
24 Erin? I see Jerry. Please go ahead.

25

Q & A

1
2 BOARD MEMBER D'AMORE: Erin, good work. Thank you.
3 Very timely, very necessary.

4 The document that you refer to, USDA Organic as
5 administered or sponsored by the OTA, it really is an
6 extraordinary document. I've been around a long time and my
7 seven years of running Driscoll Sales and Marketing, I've never
8 seen anything that quite was as heavily not stacked, but as
9 heavily persuasive. Ninety percent of consumers say they're
10 familiar with the USDA Organic seal. A full 70 of the
11 consumers say that they feel it is trustworthy. And I find
12 that to be also, I mean, these numbers, if you're in the game
13 at all, are extraordinary numbers.

14 And one of my pet peeves, if I could have two seconds
15 to be on a soap box, is I don't know why everybody in this room
16 didn't go out and take the day off and do a victory lap when
17 that came out. I'm really serious. I think that one of our
18 biggest problems as the organic group is that we don't talk a
19 common language and we don't celebrate the same victories. And
20 this is one we should all be celebrating. Thank you.

21 MS. HEALY: Thank you very much. And do keep in mind
22 that the stores may use this differently. They may insert
23 their own branding or their own pictures and we're okay with
24 that. So, you may see this in different -- in slightly
25 different varieties or colors or whatever at the store. What

1 we want to really hold on to, like you said, Jerry, is that
2 messaging. We want consumers to keep hearing that -- about the
3 four pillars and we want that QR code to be sending consumers
4 to our consumer website. So that repetition is what's going to
5 help them recognize the organic brand.

6 CHAIR SMITH: Nate, please go ahead.

7 BOARD MEMBER LEWIS: When we encourage farmers to
8 participate in this process, oftentimes we're saying, you might
9 not see it, but your voice does matter. In the spring of '22,
10 we started hearing more and more from producers saying we need
11 to brag a little. We need to think about this. And I think
12 that this was one of the most satisfying opportunities to see
13 the community ask, and the program deliver, in such rapid
14 succession that by the time this public comment came around, we
15 had farmers who were saying, thank you. We see this.

16 And I just want to say thank you, Jenny, and thank
17 you, Erin, for hearing the community and delivering so
18 magnificently. So, thank you again.

19 CHAIR SMITH: I just wanted to say, too, it
20 totally -- it landed differently for me to actually, like the
21 message, like I saw the content previously, but then to like
22 touch and like pick the things up, like, on the table, I was
23 like, man, this is great. So anyway, yeah. Excellent job.

24 I think it's your turn, Dr. Tucker. Oh, sorry.

25 BOARD MEMBER D'AMORE: That's all right. For another

1 moment, I would really like to get into the details of how we
2 collectively look at that label, that seal, that piece of
3 paper, along with 20 other pieces of paper that can be on the
4 same clamshell. There's a lot of information in that, too.
5 Thank you.

6 CHAIR SMITH: I think it's your turn, Jenny. Oh,
7 Jesus. I'm sorry. Wood, please go ahead.

8 BOARD MEMBER TURNER: You're leaving me out. That's
9 all right.

10 So just drafting -- Erin, this is great. Just
11 drafting off what Jerry was saying about just the success of
12 some of the numbers that we've seen, what do you think of as
13 success for this program? Like what does success look like,
14 and how are you, how is the program going to measure this over
15 time in terms of, is it retailer adoption, is it -- just talk
16 about that if you don't mind.

17 MS. HEALY: Yeah, that's a great question. I would
18 be elated if I saw this in a store one day. I will, well, it
19 starts somewhere, but I will give you an update. So MOM's has
20 already told us they want to pilot test this in their stores,
21 so we've already gotten the confirmed yes from MOM's.

22 I've been having a lot of conversations with Target,
23 Walmart, Sprouts, trying to think of who else. There are a few
24 others that I can't remember right now. And they are
25 interested, and they're talking about it internally. So, yes,

1 we want to definitely keep track of how many stores, how many
2 companies, and how many of those stores within those companies
3 are using this. We've also been tracking just online on the
4 consumer-facing website how many hits we're getting, how many
5 people are downloading the toolkit. So we run a monthly report
6 on that.

7 But I think the most important is getting it into
8 stores and making sure that they're continuing to use it.
9 Right? We don't want it to just be a pilot test. We want them
10 to continuously use it over time.

11 I was in Whole Foods the other day and saw that they
12 had these TVs hanging down and they were projecting images and
13 messaging, and I was thinking, right there is a perfect
14 opportunity. So we have been talking with Whole Foods as well.
15 But again, I'm one person making these calls, so we -- I
16 desperately need everybody's help. If you have contacts in the
17 retailer world, in the organic brand world, please connect me
18 to them and please also let them know that you want to see
19 these in their stores.

20 CHAIR SMITH: Amy, please go ahead.

21 VICE-CHAIR BRUCH: Yeah, thanks, Kyla. I just want
22 to say thank you for working on this. This is incredible. We
23 have such a good story to tell. The organic program fires on
24 many different cylinders and to create a very succinct,
25 digestible message was really key and you delivered on that.

1 So thank you. I just -- we'll do whatever we can to get this
2 message lifted off the ground and thank you so much for making
3 this happen.

4 CHAIR SMITH: And I should mention both Amy and Logan
5 are using the branding right now with their Zoom backgrounds.
6 So thanks for using those.

7 I think it's now your turn.

8 NATIONAL ORGANIC PROGRAM UPDATE

9 DR. TUCKER: Okay. Is it a different slide deck or I
10 just keep going here? Oh? Just keep going and I need to point
11 it the other direction. Ah, okay. All right.

12 And just to check in, we're actually doing really
13 well on time. This is actually the point where we were
14 scheduled to start the update. So that means we still have
15 plenty of time for this presentation and I'm sure there won't
16 be any questions.

17 Okay. So this is the National Organic Program update
18 for the National Organic Standards Board and our beloved
19 audience, Part 2. And so, first, I want to welcome our organic
20 farms and businesses. There are 1,667 certified organic
21 businesses in Wisconsin as of last Friday. Raise your hand if
22 you are a certified farmer business in the audience.

23 All right. Okay. I think I was actually not
24 surprised by this number, that I've always known Wisconsin had
25 an awful lot of organic farms and businesses. And as I was

1 typing the number into the screen, it just reminded me of just
2 the enormous responsibility that this board has. That this
3 board is representing not only the organic farms and businesses
4 in the room but also the 1,600 in Wisconsin and the 45,000
5 certified businesses around the world. And that's really a
6 tremendous responsibility. So, Board, thank you.

7 Okay. For those who are wondering about Part 2 and
8 what happened to Part 1, Part 1 is online. And so if you go
9 into the Organic Integrity Learning Center, there's actually a
10 pretty long and robust update about all the different things
11 that we are doing across the program. So inside of the one out
12 early last week has a direct link to that presentation so if
13 you weren't able to watch it before you came here, I do
14 encourage you to take a look if you're interested in knowing
15 sort of everything going on across the program. This was a
16 practice we started during the pandemic and we decided to keep
17 it because it does save time here to really highlight the
18 things that we actually believe the Board are going to have a
19 lot of questions on and we want to make sure we're
20 communicating in real time so it allows for more time for
21 questions and answers.

22 So the topics I'm going to be covering today are
23 Strengthening Organic Enforcement update and that's going to be
24 about 80 percent of the presentation. I will briefly review
25 the call for nominations. I promise that when I put together

1 these slides we didn't know it was going to publish today so
2 for everyone who thought that we, wow, that was impressive how
3 we designed that, we didn't. We are at the mercy of the
4 clearance process and the Federal Register, and the fact that
5 it happened to publish today, we will take no credit for. I'll
6 give a quick update on TOPP, the transitional production plan,
7 and I'm going to close actually with an award.

8 Okay. Sorry. Okay, let's start with strengthening
9 organic enforcement. First, we did it. Thank you everybody.
10 This was a long time coming.

11 So, instead of using present tense -- future tense on
12 this screen, I can use present tense. We are increasing. We
13 have increased the number of certified entities to fill gaps.
14 We are requiring the use of electronic import certificates. We
15 have strengthened record keeping and supply chain traceability
16 and we have strengthened our oversight of accredited
17 certifiers. So those were always the four pillars of SOE. It
18 is now real. It is absolutely being implemented.

19 So, I have introduced this slide recently because we
20 really are expanding the organic community and sector to
21 include an awful lot of businesses that are pretty new to all
22 of this. And so, I think like with the retailer toolkit, using
23 language that can help connect people to what we do, we've
24 started to talk about -- be more clear in talking about
25 certificates. So we take for granted what certificate means,

1 but sometimes even we get confused. Are we talking about
2 operations certificates or are we talking about import
3 certificates? Because there are two kinds of certificates now.
4 And so, I do want to just review the language that we're
5 talking about: operation level certificates, which really asks
6 the question, are you certified organic? So you're licensed to
7 sell organic. It's an operation registry.

8 There's also the electronic import certificate which
9 apparently has a new acronym that I didn't develop. I got this
10 document that said E-N-O-P-I-C and I said, what the heck is an
11 E-N-O-P-I-C? So then I figured out that that was the import
12 certificate.

13 And so, the electronic import certificate is
14 officially a three-step acronym. E-N-O-P-I-C. ENOPIC.
15 ENOPIC, there you go. It has -- and so that question is has a
16 certifier authorized this export to the U.S. as organic? And
17 so this is really the import protection side. And this is a
18 huge part of strengthening organic enforcement.

19 So we always talked about increasing the number of
20 certified operations, filling gaps, and the import certificates
21 as the absolute top elements of strengthening organic
22 enforcement. And that's the case, but it does also require
23 that we all kind of pause and remember we're dealing now with
24 two levels of certificates. And there's a lot of implications
25 for how all this works.

1 Okay. I want to review where we are with this import
2 certificate. So, first, I'm going to actually start on the
3 left side. U.S. importers must be certified organic and they
4 must be overseen by a certifier to ensure that they are doing
5 all the things that the rule tells them to do. This is an area
6 where we've gotten actually a lot of pushback of, well, why
7 should I have to be certified as an importer if all I am
8 dealing with is packaged products?

9 So we have gotten, for example, I'm going to give a
10 real life example where actually we're also already seeing
11 impacts of this rule. Because of -- so for people are
12 wondering when are we going to see stuff? We're seeing stuff
13 now.

14 Okay. So I'm going to use the wine industry. So,
15 we've gotten a whole lot of direct emails from wine importers.
16 And so there are specialty wine importers bringing in wine from
17 the EU. And they all want, well, why do I need to be
18 certified? All I'm doing is bringing in sealed wine packages
19 and then I'm sending them off. But why do I have to be
20 certified?

21 They need to be certified because it's really
22 important that importers help make sure these products are
23 compliant. So, within literally a week and a half of the rule
24 being published, we started to discover that there are wines
25 being brought into the United States from the EU with added

1 sulfites, which is not allowed under the equivalence
2 arrangement. So, under our equivalence arrangement with the
3 EU, not allowed to have added sulfites. The EU allows sulfites
4 and there's been, I think, a bit of a disconnect there where
5 you're seeing wine with added sulfites coming into the United
6 States.

7 Now under SOE, the importer is responsible for
8 checking that. So the importer needs to understand the
9 equivalence arrangement and how it impacts them. They are our
10 check to make sure a product coming in is compliant with the
11 trade arrangement. So, if you are a certifier overseeing that
12 importer, you're making sure that their OSP, their organic
13 system plan or handling plan, captures that check. Okay?
14 That's a first line of defense.

15 One of the things we've really learned over the past
16 several months is how customs and border protection kind of use
17 importers. We spend a lot of time thinking about the right
18 side of this chart, the exporters, because that's where, you
19 know, if we can stop bad stuff there, then that's great.

20 Customs has really opened our eyes to the fact, you
21 know, that importers are really where they start with
22 everything. That it's really the importer that is absolutely
23 accountable for that product coming in. Ultimately, the
24 importer is responsible for the organic integrity of anything
25 that enters the country. So, having importers getting

1 certified is part of in the public-private partnership, we
2 absolutely need those importers certified regardless of
3 packaging. And that's been a huge impact emphasis for us in
4 starting this rule.

5 There's no way we can go after every box of wine
6 coming into the country. But when we have that effort
7 distributed across all the certifiers who are certifying all
8 these wine importers, this is also something that when we're
9 rejiggering our conversations with the EU, we're putting closer
10 to the top of the list. That hey, we've detected this problem.
11 We've detected this problem very quickly and it's something
12 that we need also the EU to be working on, on their side to not
13 be sending this product over. So, that's a real-time impact of
14 SOE that happened within, you know, the first couple of weeks.
15 Okay?

16 On the right side, exporters and handlers must be
17 certified. You have to be certified to get the electronic
18 import certificate. In fact, early on there was some
19 scrambling and we have certainly heard from customs brokers who
20 have denied entry, have denied entry of product because there
21 was no evidence that the product was organic. We're three
22 weeks in and that's already happened.

23 So, exporters handlers must be certified. They must
24 have an electronic import certificate that is issued by the
25 certifier over that exporter and handler. Now, remember, one

1 of the complexities we're dealing with here is this is not just
2 USDA certifiers. It's also certifiers under our trade
3 arrangements. So EU, Canada, right now are the ones that are
4 sending the most product to us. I'm going to go through those
5 numbers in a couple of minutes here.

6 But I want us to kind of keep the landscape of how
7 all of this works. I think strengthening organic enforcement
8 has a tremendous amount of potential. And I think we're
9 already exercising that potential. So I recognize that at a
10 meeting like this, we're going to all be, well what about this?
11 And what about that? And all the things that we're concerned
12 that it does not do.

13 I am convinced, a month into this, this is a strong
14 rule and it gives us a lot of tools. And I don't think we
15 quite know the magnitude of the positive impact that this rule
16 is going to have quite yet. So let's -- we have some immediate
17 wins. A lot of the wins are going to be longer term but we're
18 already seeing wins.

19 So here's where our focus is. We're continuing
20 outreach to trade. We continue to get requests for webinars
21 from different specialty groups, different associations. We
22 are doing rapid responses based on import data. I'm going to
23 get to that in a couple minutes. We have sent an information
24 request to all of our certifiers on how they're implementing
25 SOE. That's due mid-May.

1 We're also fielding a lot of new policy questions and
2 feedback. Top one has been impact on small farms.
3 Strengthening organic enforcement is not supposed to overburden
4 domestic small farmers. And so we have been having a lot of
5 conversations with certifiers on how to manage in a sound and
6 sensible way. How to manage in a sound and sensible way that
7 we're not overburdening small farmers. This rule is supposed
8 to help, not hurt.

9 We are also getting a lot of policy questions from
10 high-volume retail distribution centers, logistic warehouses,
11 and importers and brokers. Again, these are business types
12 that are pretty new to this. And that means it's also new for
13 some of our -- many of our certifiers. You know, these folks
14 are working high volume; lots and lots of suppliers, lots and
15 lots of buyers, and we are finding that those take different
16 approaches. And so, we are learning a whole lot about a whole
17 lot of new businesses that have not really been part of organic
18 certification before.

19 Okay. So here are some numbers early on in. So --
20 and if you did watch the online version, you'll see these
21 numbers have changed since we recorded the online version
22 because things are moving quickly. At this point, the NOP has
23 sent more than 700 letters to uncertified operations. So that
24 was -- so these are primarily importers that are not yet
25 certified but are bringing a product into the country. That's

1 since the rule went into full compliance mode on the 19th of
2 March, so in about five weeks, we sent 700 letters to importers
3 that need to get themselves certified. To me, that is the
4 absolute critical path there. Once those folks are in the
5 certification fold, they will be part of the protection
6 mechanism to ensure that products coming in truly are authentic
7 and to make sure they can -- that they have NOP import
8 certificates. Because we are seeing -- we'll see this in a
9 minute, that there are imports coming in that do not yet have
10 import certificates. We really need all the importers to get
11 certified to help us stop that from happening. So we can do a
12 lot of work at the program level, but in the distributive
13 public-private partnership, we really need everybody on, I've
14 been doing this now for a year and a half, the handshake across
15 the border, we really need everybody to be certified.

16 It is working. So, while there might be people who
17 are concerned about the fact that there are 700 who are not yet
18 certified, and I agree with you, we've also made a whole lot of
19 progress. There are almost a thousand. My team told me that
20 as of the time I'm giving this presentation, it's likely to be
21 a thousand U.S. handling operations certified between January
22 and April this year. That is comparing year to year, a three-
23 and-a-half fold increase year to year. And so we do see a lot
24 of folks who have got into certification, have completed it as
25 of last week.

1 Of the 989, 640 were certified in March and April.
2 So, you know, we did have a bit of, I had people say a year
3 ago, you know, people are going to wait until the last minute.
4 We have had a little bit of that. We have seen a bit of a
5 grieving process over the last year where people needed to kind
6 of argue about oh, I don't really need to be certified. Oh, I
7 really need to be certified? Well, what if I'm only doing
8 this? So the bargaining phase and just moving through the
9 grieving process. They finally got to acceptance and haven't
10 quite gotten certified by the end of the acceptance phase, but
11 we've moved them with that grieving process and here we are.

12 There are about 1800 new handling operations
13 worldwide. So that includes the U.S. handling operations, but
14 that also means that some of those uncertified handlers, those
15 exporters, that we really needed to get certified in order
16 to -- in order for them to get NOP import certificates, we have
17 learned there have been an awful lot of aggregators out there
18 who have not been certified and that makes traceability outside
19 the United States very, very difficult. So we are filling a
20 lot of gaps here. So there are still lots of uncertified
21 importers, but we're making good progress.

22 Now the question is, well, how long is it going to
23 take for these 700 to get certified? And it turns out a lot of
24 them really are in progress. So when my team sends out the
25 letters, they often will get emails back saying, I'm working on

1 it. Here's the certifier I'm with.

2 We have had some folks who are still stuck in denial
3 of, well, I don't really think I should be certified, even
4 though I'm importing. We have an escalation process to follow
5 up with those. So the team has a process for tracking all of
6 these to determine kind of what the escalation phase will be to
7 make sure that these folks either finish certification, start
8 immediately, or get out of the market. Get out of the market.
9 Right now, it's looking like the backlog, because of complexity
10 and backlog, we've got about a two to six-month timeline right
11 now for certifications.

12 Okay. Now, let's turn to the import certificate. We
13 are still refining our metrics tracking. The amount of data
14 that we're getting is enormous. And so we really are trying to
15 get our arms around what does it mean, what do we do with it,
16 and how do we present it in a useful and meaningful way.

17 We have never had access to the kind of information
18 we have access to now. And we can talk about what the real
19 time -- it's not just about the process, it's not just about
20 the data. We have already stopped non-compliant products from
21 entering the United States, based on this work. So I'm
22 presenting numbers, but it's really about stopping bad guys
23 from sending stuff here. And we get that. Right? We get
24 that. It is very hard sometimes to communicate the presence of
25 absence. Right? The lack of fraudulent product coming to the

1 United States.

2 So far, out of the Organic Integrity Database, there
3 have been about 21,450-ish total import certificates. So
4 that's generated out of our system. That's where the
5 certificates are born. Of those, about -- almost 12,000 are
6 active. So that means that they are in process, meaning they
7 are either in the range of time allowed for it. Actually,
8 that's primarily what it means.

9 There have been some certificates where the certifier
10 screwed up and marked it as invalid, so it's an invalid
11 certificate. Or the certificate has, frankly, been used. And
12 so we've had 5,300 import certificates actually entered into
13 Customs and Border Protection, the ACE system. So certificate
14 numbers originally issued out of the Organic Integrity
15 Database. That's by the certifier of the exporter to the
16 United States. That package is provided to the importer. It
17 is then the broker that enters it into the customs system. So
18 that's happened about 5,300 times at this point in the game.
19 Okay.

20 Again, some of how we proceed with enforcement and
21 oversight depends a little bit on what the volume is. Right?
22 We're going to have to make sound and sensible choices about
23 how all of this plays out. We have to have a sense of what
24 we're looking at here. We've never had this kind of data to
25 understand what's actually coming in.

1 At this point, approximately -- more than 70 percent
2 of import certificates appear valid, meaning that the number
3 that went into the Customs and Border Protection system, the
4 number of those that matched the number generated from the
5 Organic Integrity Database is over 70 percent. Okay.
6 Honestly, with something this big, I'm going to take that as a
7 win because this data right now also only reflects electronic
8 import certificates. So it does not reflect import
9 certificates that may still be paper-based because a certifier
10 hasn't quite gotten like, in a trade partner country, let's say
11 there's a certifier in Italy that hasn't quite gotten its
12 operations added but those wine producers still really want to
13 send wine over here. They may still be using paper
14 certificates until the trade partners fully get into the
15 system. That's just an example of why something might be in
16 that 30 percent. So it's not that it's an invalid product. It
17 means it doesn't have a valid import certificate right now.

18 We're only five weeks into it. I'm going to take the
19 70 percent as a win right now. Okay? That number is also
20 going to continue to go up over time. We'll show you trends in
21 a second.

22 About 63 percent of import certificates at this time
23 have been issued by USDA certifiers. The rest have been issued
24 primarily under the EU, Canada, and just a couple from Japan at
25 this point. So the current data in CBP, the ACE system, that

1 5300, reflects mainly land-based imports. So, for example,
2 that 11,000 that are active, those might be, I know there's a
3 whole lot of interest in imports of feed for example. Well,
4 that takes longer to get here. So it could be that many of
5 those active certificates are on -- are for a product that has
6 left the country but is sitting on a ship somewhere between
7 there and here. It has not hit the entry system yet. So,
8 there's a bit of a lag time here.

9 So, the initial data we're looking at starts with
10 land-based imports but will shift over time as we start really
11 having the global throughput successful. So we can kind of see
12 that in the list of commodities. So right now, the top
13 commodities coming into the United States are avocados, for
14 example, from Mexico, berries from Mexico, because those are
15 products that are moving quickly across the border. So the
16 time between the issuance of the certificate from our system
17 and it hitting the CBP system is quite short.

18 And so, though it's interesting that just as we've
19 been monitoring over the past five weeks, we're already seeing
20 some changes in the composition of commodities. So I'm going
21 to be interested in when does that list level out? You know,
22 when do we hit -- we don't know what a stable level looks like
23 yet. We're not there yet. Okay?

24 The feedback from customs brokers are that they need
25 more rapid turnaround on import certificate requests,

1 especially things that are moving across the border quickly.
2 They're being told by certifiers it's going to take a couple of
3 days because I need to make sure that this is actually an
4 authentic shipment. And the brokers say, well, okay, and we
5 need to move it along. The feedback from us is to certifiers,
6 only issue valid import certificates or you will lose your
7 accreditation. Period. Okay?

8 We're taking this really seriously. This is not a
9 paper chase. This is not a paper chase. And so, if certifiers
10 work -- who are overseeing those exporting companies, if it is
11 found that that product is not authentic organic, the rule
12 allows us to hold those certifiers accountable.

13 And in fact, we have enforcement action currently
14 against certain certifiers. Because that's in progress, we're
15 not talking about details. Some of the enforcement work we're
16 not going to be able to share publicly. I encourage you, if
17 you are interested in kind of monitoring how things are going,
18 our enforcement webpage lists settlement agreements. It lists
19 decisions. It lists enforcement actions.

20 So here's the trend over time. This is a look at --
21 the green are valid import certificates in the customs system.
22 So valid certificates that have entered the customs system.
23 And this is where we got that 70 percent-ish of being valid.
24 And so the rest of them are kind of a mix of different
25 certificates that we are following up on. Okay? There's a bit

1 of a learning curve here for everybody but that we're following
2 up.

3 So you can see the trend line slowly going up. We're
4 going to have to see when that kind of levels off. You can see
5 when the weekends are. So the dips are the weekends. Okay?
6 It's actually kind of helpful to see how many weeks that we
7 have here. And you can see that that -- there are some days
8 where that green line is pretty thick and there are some days
9 like in the very recent where there's a little bit more red.
10 And so, there are examples of the things that are not green are
11 certificates where somebody clearly fat-fingered the entry. So
12 there's just a typo. And you can tell everything about the
13 code is correct except for like the last two numbers that are
14 transposed when you compare the CBP number to the import
15 number. So it's really close, but somebody flipped the last
16 two numbers when they were entering it into the customs system.
17 So we do have some of those.

18 We also have, as I mentioned, the paper-based import
19 certificates where it could be that people just quite aren't
20 ready or can't or aren't able or had a system crash. We had a
21 couple of systems glitches our first couple of weeks where
22 people just had some challenges generating import certificates,
23 and those are working their way through the system. But there
24 -- again, there's a little bit of a lag time here. So if our
25 system was down, you know, even for six hours the first week,

1 which it was. You know, this is a big system update and
2 unfortunately happened at the exact same time our agency needed
3 to do a system update. And that happens. And so, occasionally
4 there are going to be these paper certificates that show up and
5 there may be a lag period in which they appear.

6 There's also a temporary code that customs brokers
7 are allowed to use if they do not have the permanent 21
8 character code for the import certificate, but they have other
9 evidence that the product is organic. And so that is what
10 we're calling a temporary code to allow them to put the product
11 through because they have verified it as authentic product even
12 though they do not have the electronic import certificate. The
13 brokers are very, very selective about using that.

14 Brokers are licensed and can use -- lose their
15 license just like our certifiers can lose their accreditation,
16 just like an operation can lose their certification. So,
17 customs brokers have a lot to lose by not following our rules.
18 And in fact, we are hearing about customs brokers who are not
19 allowing product in because there's no evidence that it is
20 organic.

21 So, while we don't necessarily have stop-sale authority, the
22 customs broker can say I'm not entering this as organic. I'm
23 going to change it to conventional because there's no evidence
24 that this is organic. And so, in many ways, customs brokers
25 are becoming our very first line of defense in ways that I

1 think are helping us more than any of us can possibly realize
2 at this time.

3 Again, the presence of absence. We're not going to
4 get a phone call every time a broker does that that says, nope,
5 you don't have it. I'm not doing it. But customs all -- every
6 broker working in the U.S. system got the alert from the
7 customs system saying our rules are live. Follow them. And
8 they're not going to risk their license on it. They do this
9 every day. Right? For them, organic is just one more piece of
10 the puzzle, but they're not going to risk anything. They don't
11 -- they're going to do what they need to do. So that serves us
12 in ways we're not always going to be aware of.

13 Okay. Key challenges. We've got problems. Right?
14 We've got success, so we have new problems.

15 We do have a certifier learning curve here.
16 Certifiers, both USDA and our trade partners, are still
17 learning this system. They are not always accurately marking
18 in our system in the integrity database if the importer is
19 certified. And that's creating some problems because a couple
20 of -- a few of those 700 warning letters that we sent out, we
21 actually got emails back from the importer saying I am
22 certified. Here's my 10-digit code. So we need to help
23 certifiers get better in the Organic Integrity Database of
24 identifying whether an importer is certified or not.

25 Eventually, we're going to keep monitoring. At this

1 -- at some point, we may make that mandatory because it's
2 mandatory for importers to be certified. It may be they're not
3 able to generate the electronic import certificate without
4 having that 10-digit code for the importer.

5 We're not quite there yet. Again, we still have a
6 lot of importers that are, in good faith, in the pipeline.
7 We'd like to let them get through that pipeline.

8 Certifiers are also making that transition from the
9 legacy paper certificates to the new electronic system. And
10 that's in part why you're seeing those 30 percent are not
11 electronic yet, because that's the data right now we're
12 getting. It's not the legacy paper certificates.

13 Our regulatory discretion, the degree to which we can
14 support kind of the on-ramp into the rule, even though we know
15 folks have 14 months and sometimes the grieving process takes
16 more than 14 months, but we're trying to support legitimate
17 trade while also protecting organic integrity. So all
18 producers, processors, and most others must be certified right
19 now. Period. Full stop.

20 Exporting handler must be certified to get electronic
21 import certificates. Again, those are mandatory. Period.
22 Full stop.

23 I do want to note, this is important, particularly
24 when we're talking to customs audiences, the entities listed on
25 the import certificate may differ from customs filing

1 documents. Certifiers are kind of adopting different
2 frameworks to apply to very diverse supply chains. So some
3 variability is expected because the actors that CBP cares about
4 might be different than the actors that we care about. Their
5 handshake might be slightly different depending on what the
6 issue is, and so, some variability is expected. In fact, in my
7 view, the more actors we've got, the better. Right? There's
8 more people we can follow up on between the filing paperwork
9 and the import certificate.

10 We are allowing more regulatory discretion with U.S.
11 importers who are not physically handling the goods. So these
12 wine folks who took a little longer to get in the pipeline and
13 others. I'm using them as an example simply because we've
14 gotten -- at one point, our customer service team reported that
15 like 40 percent of the incoming questions on SOE were from wine
16 importers. So it's a very small import community. Lots of
17 very small importers that we're trying to get into the fold.

18 So, even if an importer is not physically handling
19 goods, they still need to get certified and they must get a
20 valid electronic import certificate. And our brokers are a
21 great line of defense with us in making sure they're
22 communicating that to importers. So, A, you need to get
23 certified and, B, you have to have this import certificate. So
24 we do have a whole outreach community of these licensed brokers
25 out there who are helping us.

1 Okay. Emerging certification process topics. We are
2 integrating new business types and structures. So I already
3 mentioned these retail distribution centers. Many of them
4 really are in the fold here. We have had conversations with
5 very big players who are calling us to kind of talk about what
6 they are encountering as they are entering the certification
7 fold. These are incredibly high volume, high throughput
8 environments. We need evolving certification models.

9 I would say that that applies at both ends of the
10 bell curve. I'm getting policy concerns from really small
11 farmers, getting policy concerns from really big retail
12 distribution centers. They both have different kinds of
13 concerns. They all revolve around the concept we've been
14 talking about for years, which is sound and sensible.

15 How do we ensure organic integrity and still move at
16 the speed of business? That's the central question, moving
17 forward. How do we ensure organic integrity and also move at
18 the speed of business? That's going to require new approaches.
19 New approaches with small farms, new approaches with really big
20 retail distribution centers and warehouses and all sorts of
21 stuff.

22 I've been really pleased by hearing the collaboration
23 that's happening between certifiers and their clients of really
24 identifying -- these are big names. These are big brand names.
25 They don't want their name in the paper for fraud either. And

1 so, we're really positioning these folks as partners in this
2 problem. How do we do this so that they're protected, we're
3 protected, the consumer's protected, and farmers are protected?

4 We're getting a lot of questions about private label
5 arrangements. And so they're -- the questions are, okay, brand
6 owner versus the handler versus the what goes on the bag and
7 all sorts of questions that are coming up on private label
8 arrangements. We do want to clarify this with certifiers, but
9 just sharing for the world, the rule does not require retail
10 label changes for newly certified private label handlers. So
11 we have had some certifiers tell a private label, the folks
12 putting stuff with the bags, you've got to get new bags.

13 If you have questions about what the rule covers and
14 doesn't cover, often a really good place to go is the cost
15 section and how we estimated the cost of the rule. And new
16 retail packaging was not part of the rule. And it says
17 explicitly, if you search on private label in the rule, it
18 comes up in somewhere in the teens, and one of those references
19 specifically talks about retail label use of private label
20 arrangements.

21 The fact that we're at this level of problems right
22 now, I take as a pretty good sign. Right? We are -- anytime
23 you're starting to get into this level of detail, we're doing
24 something right. Okay? We're doing something right here.

25 Balancing traceability with protecting confidential

1 information. You know, now we have the OID, Organic Integrity
2 Database Certificate, but we also have a certificate addenda
3 that certifiers have and are issuing. And there's really a key
4 question, and I think it's an open question of what does a
5 really high volume entity need? Do they really need all those
6 addenda, or the fact that that operation is certified in the
7 Organic Integrity Database to list that product, is that
8 sufficient? And so, these are questions we're all going to
9 have to wrestle with as we move forward. And so, we're
10 inviting a conversation about what this looks like. Again,
11 organic integrity at the speed of business.

12 Defining risk-based certification approach.
13 Oversight is going to have to differ across different business
14 types and sizes. We do not want to overburden small farms, so
15 that's been a real key message for our certifiers. There have
16 been complaints about some very specific certifiers, and how
17 they've gone over the top. We've called those certifiers. So,
18 we want feedback.

19 We're all figuring this out. Remember, any certifier
20 out there is worried about getting kicked out. You know, when
21 I say something like, we're going to kick you out, people get
22 nervous, right?

23 At the same time, that means -- that doesn't mean we
24 overburden our small farms. So, we're hearing about OSPs that
25 are now quite, you know, might be twice as long. It turns out,

1 maybe pages 7 through 14 are all N/A, doesn't apply to me, but
2 that's still an awful lot for farms to have to navigate. So,
3 we have to find a better way of doing this. I have full
4 confidence in our ability to do that as a community and as a
5 sector, and I think it's one of the promises of Strengthening
6 Organic Enforcement.

7 This is where we do the sales pitch on why it's good
8 to be certified. So, preaching to the choir here, but these
9 are the talking points. Actually, all the brokers have these
10 talking points, too. I make sure that I do this in every
11 single presentation with customs brokers, and they will, when
12 we have phone calls with them, well, I told them that the
13 benefits are this and this and this and this. And so, it's
14 great, again, to have them magnifying our voice about the
15 benefits of certification.

16 All right. Next steps. Responding to questions and
17 scenarios from certifiers in trade, emphasizing of the
18 identification and implementation of sound and sensible
19 approaches. Rapid follow-up with importers, both certified and
20 uncertified, on invalid APHIS or these transition codes, and
21 taking progressive enforcement.

22 Folks do still get due process, and so there is a
23 process that needs to unfold here. We want to educate
24 certifiers on common data quality problems with the import
25 certificates. For example, not marking an importer as

1 certified when they actually are. Reviewing certifier organic
2 control system updates; we'll get their information in May.
3 But we have also been hearing from certifiers and clients so we
4 can calibrate, almost in real time, when we start seeing
5 patterns of what needs to be addressed.

6 We had a webinar with over 300 certifiers and
7 inspectors a couple weeks ago through the accredited certifiers
8 association. It was great to get their feedback, but also to
9 sort of introduce some of these very early observations.
10 Again, we're only five weeks into this. We're only five weeks
11 into this, and we're already seeing some real action.

12 We do need to monitor and adjust the import
13 certificate flags. That's for the customs folks, because
14 organic has such a broad array of commodities. There's an
15 awful lot where customs brokers are getting pop-up boxes that
16 says product organic or not, when actually there's really no
17 way that product is going to be sold as organic. So kind of
18 glitches like that, those take time to work through, and we
19 don't want to take anything off the list that needs to be on
20 the list, because so much can be certified organic.

21 We are also working with trade partner organic
22 programs to assess systems. So if you go into the trade
23 partner module of the Organic Integrity Database, you will see
24 the listings of countries and programs, to be able to see the
25 different operations in there. Most of those are exporters.

1 So they're exporters that are in there in order to be able to
2 issue the electronic import certificate. That's the function
3 of the trade partner module. It is not designed to kind of
4 take over those schemes' programs. It is designed to
5 interface. Again, back to the importance of that handshake
6 between that -- their exporter and our importer. And we'll be
7 taking enforcement action where needed.

8 Pheew. Okay. I'm going to take a drink of water for
9 just a second.

10 CHAIR SMITH: If you know a customs broker, sounds
11 like we all need to buy them a beer or a drink of their
12 choosing.

13 DR. TUCKER: Okay. Next, call for nominations. So
14 that was published this morning. Again, I did not know that
15 when I put together this slide.

16 We'll emphasize the importance of one-to-one
17 outreach, of really reaching out to people that you believe
18 would be good members of the board. The program does the same
19 thing. We have a list of what, 300 people you said, ish?
20 Okay. Over 300 people.

21 We do a lot of direct marketing from the program to
22 different groups, to folks who maybe have applied before and
23 weren't selected. We always want to encourage folks who may
24 have applied before, weren't selected, to try again. The
25 timing might be right. There are a number of folks who have

1 been on the board that tried two, three, four times before they
2 made it on the board. Timing is everything. So do encourage
3 folks to reapply.

4 We are looking for one organic farmer -- farming
5 representative, two handling representatives, one retail
6 representative. This one's going to be interesting because
7 there are now so many retail distribution centers who have
8 gotten certified. These retailers have real skin in the game
9 now. They've always had skin in the game, but now they really
10 understand some of the inside baseball aspects of certification
11 and may kind of be more interested in entering that public
12 sphere of work here. And then, one individual with expertise
13 in environmental protection and resource conservation.

14 Okay. Transition to Organic Partnership Program.
15 We're going to be hearing later this morning from the Midwest
16 TOPP group. Who's in the room who is part of Midwest TOPP? Go
17 ahead and raise your hand. A lot of folks. Let's give them a
18 round of applause. Yay. We're going to be hearing from them
19 more, later today.

20 At a national level, so far in the TOPP program,
21 we're about a year and a quarter into this. More than 20,000
22 people have expressed some kind of interest in transitioning to
23 organic and that's at over 400 events. And so, these aren't
24 just people who showed up at a conference. These are people
25 who actually have engaged in the process to learn more.

1 When you move to the mentorship component, we've
2 received 275 mentor applications; mentee applications, 375; and
3 130 mentorship matches have been made. We've also really
4 learned different regions need different things. Mentorship
5 works great in some regions, doesn't work as well in other
6 regions. And so, we do have kind of a new category of service
7 called technical assistance where maybe a farmer doesn't want
8 to enter into a mentoring relationship but would really like to
9 work with somebody with expertise on a focal basis to get some
10 technical assistance. And I think that's somewhere around 400
11 instances where technical assistance has been offered at this
12 point.

13 So, part of the TOPP program is the recent
14 introduction of the Transitional Production Plan, TPP, another
15 acronym. This is an important on-ramp. You know, record
16 keeping is part of the organic system, and so learning how to
17 do that early in the process, but also demonstrating how that
18 can be done in a fairly light way -- lightweight way is kind of
19 the goal of the TPP. So once a farmer has completed a TPP and
20 a certifier has signed off on that, it involves not an on-site
21 audit. It involves -- it is a desk review once, however, it
22 appears that that operation is going to be able to comply.
23 Again, this is transition, right? So it's an extra regulatory
24 category. There is not a formal certification category for
25 transition.

1 So the Transition Production Plan includes the things
2 one would be doing to be able to be successful in becoming
3 organic. So when a certifier signs off on that, that operation
4 is then eligible to be listed in the Organic Integrity Database
5 as a transitional operation. Now, those listings are not
6 available to the public. Those are only available to USDA, but
7 they do allow us to share that data with RMA, Risk Management
8 Association, for the purposes of insurance, crop insurance,
9 transitional crop insurance. So if you're listed in the
10 Organic Integrity Database and RMA can find you there, you have
11 a transitional production plan. That counts as an OSP for the
12 purposes of RMA. And so, they were very pleased when this came
13 out. They had a chance to look at it. There are also elements
14 of this that can support applying to NRCS programs.

15 Phew. Okay. I am going to close here with a peer
16 award. So we have a program, and there's folks who have been
17 here before who have seen me do this before, giving the
18 Employee of the Quarter Award here at the program. When we
19 have people who have won it who are actually in the room, I
20 like to do those awards in person. And so, this quarter, our
21 Employee of the Quarter is Jo Mirenda. Yay. So I'm going to
22 talk just a little bit about Jo and how fabulous she is and
23 then I'll bring up the award for you. Okay?

24 The Employee of the Quarter is a, again, a peer
25 nominated award. The entire Standards Division came together

1 to nominate Jo for this. And it was because she's a terrific
2 colleague and really smart and really helpful, worked on the
3 retail toolkit and the primary driver for this particular
4 quarter was the overhaul of the NOP handbook.

5 So we talk about SOE, but there are a lot of other
6 pieces of SOE too, including cleaning out the handbook so that
7 we didn't have a lot of conflicts between the handbook and
8 Strengthening Organic Enforcement. That was a huge lift. The
9 handbook hadn't been updated in a while, and doing that review
10 and categorization of what could be updated easily, quickly,
11 what might need more updates later on, but we couldn't do right
12 now, and making those kind of tough decisions about what was in
13 and what was out, lots of different opinions of that. And so,
14 Jo did not only a fabulous project management job, but a great
15 job doing a lot of the writing of those documents. So, for all
16 those reasons and more, Jo, thank you very much.

17 Okay. That whole thing took a little longer than I
18 expected so sorry about that, but it felt like there was a lot
19 to share there so I'm turning it back to you for Q&A.

20 MS. HEALY: Great. So, yeah, now we will have Q&A
21 for Jenny from the board. I see Allison and Brian. Go ahead,
22 Allison.

23 Q & A

24 BOARD MEMBER JOHNSON: Thank you so much, Dr. Tucker.
25 That was a huge amount of information and I think we can all

1 agree that we're really impressed with how much work has gone
2 into SOE and the continuing transition work and seeing these
3 numbers is just astounding, so thank you. On transition in
4 particular, I've been in a deep dive on transition for a number
5 of years now and just having a number to point to, 20,000
6 people interested in transitioning is big because up until now
7 it's been like, well, they're probably out there. We don't
8 really know how many, but hopefully we can help them. So
9 starting to get concrete and see this progress is huge.

10 On Wednesday, we'll be talking about a proposal on
11 transition and one of the main pieces of feedback that we heard
12 in public comments this time around is around the NRCS portion
13 of the Organic Transition Initiative. I know TOPP is in your
14 purview. We have the market grants part, and then we have this
15 NRCS incentive for transition, and it sounds like people are
16 really struggling to access it and that it's quite uneven
17 across the country. I know that's outside the NOP's world
18 directly, but I'm wondering if you have any advice for us as
19 the board and as a community about how we can get all these
20 pieces working together better?

21 DR. TUCKER: Yeah, thanks for the question. We meet
22 monthly with the NRCS lead in charge of the organic programs.
23 And one of the things we've really learned is just how
24 different NRCS's governance and roles and structure and
25 organization and funding and everything else, just how

1 different it is from how we tend to operate as a national
2 program. And when -- we -- my best advice is move with their
3 system. Move with their system, which really means one person
4 at a time.

5 So there are a whole -- every state is a little
6 different. Think about NRCS's mission. So, a whole lot of
7 what NRCS does is very local conservation work, right? They
8 have state-level leads. They are designed to have people right
9 there on the ground providing service. Some of those folks
10 don't know anything about organic. Some of those folks
11 actively don't like organic because there are some organic
12 practices that they don't feel are compatible with NRCS.

13 Every state office is going to be a little bit
14 different and may have a leader who feels differently about
15 organic. So the best advice for everybody is figure out how to
16 distribute across the network. Now our TOPP folks are already
17 doing this. We've had some TOPP leads who have tried to
18 contact NRCS and haven't been successful, right?

19 This is a work in progress. This is a work in
20 progress. They do have projects under OTI that haven't quite
21 gotten out the door. There have been some challenges there.
22 We're incredibly lucky to have been able to field TOPP
23 reasonably quickly and to get the program out and operating.

24 NRCS has had more challenges in doing that for a lot
25 of different reasons. So, the best advice is work your local

1 networks. Get to know your NRCS contact wherever you are
2 because it really is "all politics is local" with NRCS.

3 CHAIR SMITH: Brian, please go ahead.

4 BOARD MEMBER CALDWELL: Jenny, thanks so much for all
5 this work. It's super impressive and I'm always amazed at the
6 breadth of your expertise. Got to say that.

7 One of the things I'm ignorant about, I'm going to
8 have two quick questions. One is, first one is what are
9 customs brokers, kind of what do they do? I don't know what
10 their role is exactly. But the second is whether there are
11 other government agencies that can help with the residue
12 testing part of, you know, basically fraud prevention at the
13 borders and whether we might be able to transfer some cost of
14 that from our certifiers and handlers and farmers, to the
15 exporters and, you know, other entities, so.

16 DR. TUCKER: Okay. Let's take the first one first.
17 What do customs brokers do? You know, I have learned a lot
18 about customs brokers. In fact, I went to a customs brokers
19 conference just a couple of weeks ago. It is fascinating what
20 these folks are dealing with just every single day.

21 They are responsible for making sure that imports
22 into the United States comply with the law. That's, I mean, in
23 a nutshell, what brokers do. So, what does that practically
24 mean, is that for any product coming into the United States,
25 they need to understand what the rules are that apply to that

1 particular product.

2 So, for example, I gave a panel. I was sitting next
3 to an APHIS employee who is in charge of the Lacey Act, which
4 relates to native wood products. You can't bring in, for
5 example, endangered species wood products into the United
6 States. So all these customs brokers have to, just like
7 they're checking for organic import certificates, they might
8 also be checking for, depending on the product, was the Lacey
9 Act met? All sorts of FDA rules that they have to follow.
10 It's just a number of laws and acts that govern imports.
11 They're responsible for all of that.

12 BOARD MEMBER CALDWELL: And are they sort of the same
13 as what I think of as custom agents? Are they government
14 employees, or --

15 DR. TUCKER: They're not government employees. They
16 are licensed brokers. You can go to school to become a customs
17 broker. There's an exam and everything. It's a very rigorous
18 process.

19 But yeah, these are private sector entities. They
20 may be small businesses. They may be individual, sort of an
21 LLC, if they have a very, very focused import portfolio. These
22 are multi -- like our certifiers, multinational companies with
23 multinational companies that have brokers all over the United
24 States. Yeah. It's an impressive group.

25 In terms of testing, so we are doing more testing now

1 from the National Organic Program. So, we are certainly aware
2 of commodity-country combinations, region commodity
3 combinations, where we would like to do some surveillance of
4 that. And so we are taking -- we're collecting samples at
5 different ports.

6 But we also have funded the Federal Grain Inspection
7 Service, FGIS, which is a sister program to AMS. They already
8 have folks at the ports around the United States because
9 they're exporting grain. And so they have agreed to help us
10 out with a pilot to kind of flip the role and actually do some
11 sampling of imports coming in because they're already at some
12 of the ports that we're particularly interested. With SOE,
13 we'll have an even better sense of what's coming into what
14 port, so we can do much more targeted testing. So we've
15 already funded FGIS to do that work.

16 BOARD MEMBER CALDWELL: Thank you so much, Jenny.
17 And this is so important. I'm just really psyched at the
18 effort you're putting into it and, like I said, the
19 comprehensive aspects.

20 CHAIR SMITH: Amy, please go ahead.

21 VICE-CHAIR BRUCH: Sure. Thank you, Kyla. Thank
22 you, Jenny. Very encouraging, your early assessment of SOE in
23 action. Really appreciate your update and all the work that's
24 being executed on that.

25 I had a question on transparency, acres on

1 certificates. It was a big initiative by the board and with
2 SOE we do have transparency of operations. Size is becoming
3 available on OID, which is really a step in the right
4 direction.

5 I wanted to ask you, though, about insight into
6 grower groups and production acres with them and also with our
7 equivalency partners, when we're importing products into our
8 country that pass through equivalency partners. How do we get
9 transparent data relating back to the farm on operations that
10 are coming in via imports from those type of vehicles? And
11 then, just, maybe you can touch on general equivalency partner
12 oversight.

13 DR. TUCKER: Okay. Great questions. First, I do
14 want to acknowledge that this is a board recommendation that
15 was implemented. It was implemented fairly quickly. So this
16 board had a lot of conversation about including certified
17 acreage on certificates. And if you go right now into
18 operation profiles within the Organic Integrity Database, it is
19 now a required field. And so, total operation acreage is
20 required for USDA certified operations.

21 The -- now, let's move on to grower groups. The
22 requirements, there are two steps of that. Most operations are
23 not grower groups. Right? So, we have to be kind of careful.
24 You have to think about the data and how the data relates to
25 each other. So, it would be not sound and sensible to ask

1 every single certifier to enter in like, 0 or 1 for any
2 operation that isn't a grower group, right? So, that's just a
3 lot of work. Right?

4 So, the grower group field, in terms of numbers of
5 producers in the grower groups, is tightly linked to another
6 field in the database called business type. The business type,
7 there are a number of different business types in Organic
8 Integrity Database. One of them is grower groups. And so, the
9 database is being programmed such that if the certifier picks
10 grower groups as business type, then there will be a required
11 field of number of entities in that grower group. We're
12 expecting that to go live around the end of June.

13 That's a fairly significant update for certifiers.
14 You know, for certifiers who have already kind of programmed an
15 interface between their systems and our systems, us making
16 fields mandatory as required under SOE is actually a fairly
17 significant lift and I want to kind of honor the fact that this
18 is a lot of work. So, the number of grower group entities will
19 be mandatory as of right now, the end of June. So, at that
20 point for any of those farms, a grower group farm, you'll be
21 able to see the total acreage of the operation and you'll be
22 able to see the number of farms. Those are for USDA farms.

23 Now, to the equivalence part of the question. I
24 mentioned during our update that the primary purpose of the
25 trade partner module in the Organic Integrity Database is for

1 exporters, that exporters from the United -- from outside the
2 United States to the United States in order for the purpose of
3 getting an import certificate. So the same is true for the
4 other way around if we're sending something to TRACES, for
5 example.

6 There are lots of different handshakes between
7 different equivalence partners, but there are also governance
8 boundaries. There are governance boundaries. And so, we could
9 under the rule, invite or require that import certificate. If
10 you want to ship products to the United States, you have to
11 have an import certificate. But the operations, the producers
12 inside of those governments and government countries, they're
13 actually growing but aren't the exporter. That's within the
14 purview of the equivalence partner, not us.

15 We do not, and this tends to be a little bit of a
16 surprise to people, we do not have direct jurisdiction over
17 certifiers under organic -- other organic schemes, equivalent
18 schemes, and we don't have jurisdiction over their operations.
19 So, if there is a problem with something coming from a trade
20 partner country, we need to work through the trade partner. We
21 have to work through the trade partner. Okay?

22 Now we've been doing -- good news. We've been doing
23 this for a long time. Better news, that relationship -- those
24 continue to strengthen. It is something we really need to be
25 aware of and monitor really closely over the coming months

1 here, because I mentioned that about 37 percent of the import
2 certificates are coming in under trade arrangements. If there
3 are problems with those products, we're going to need to work
4 through the trade arrangements.

5 So equivalents have a lot of benefit in facilitating
6 trade, but they also have some limitations in terms of
7 jurisdiction and to your kind of question, transparency. We
8 don't necessarily -- I mean we're very -- I think we need to
9 acknowledge how advanced the Organic Integrity Database is.
10 The fact that we are such a transparent system, I think can
11 help in sparking other governments to become more transparent.

12 I think there are questions of are we really still
13 equivalent that need to be asked. This is a process, not an
14 event though, because these are again country-to-country
15 conversations and negotiations. And so, I cannot -- we cannot
16 for example, require our trade partners to enter in all of
17 their crop operations and all of their acreage. We just can't
18 do it.

19 The question is, are our systems equivalent? And so
20 we'll be working -- are working, present tense, with those
21 partners to share what have we done on SOE, what have we
22 learned from it, and to ask them, what are you doing about this
23 problem? How are you handling this? Gosh, you've grown a
24 whole lot of operations in this location. How are you
25 overseeing those?

1 Having the import data will give us much better sense
2 of what's going on. So, if we get, for example, an invalid
3 import certificate that's under a trade partner country, we can
4 ask them to investigate why don't we have a valid import
5 certificate? It does add a layer of complexity and oversight
6 that I think we're all going to learn what the implications
7 are.

8 So, Amy, that was a long answer, but it was also a
9 really complicated question.

10 VICE-CHAIR BRUCH: Thank you, Jenny, for diving into
11 that more. I appreciate it.

12 CHAIR SMITH: Kim, please go ahead.

13 BOARD MEMBER HUSEMAN: Thanks, Kyla.

14 Jenny, I've thought quite a bit as you were speaking
15 about how to frame this question, because I feel like you have
16 done a nice presentation on SOE implementation and sound and
17 sensible as we talk about the farmer community, the small
18 farmer in the U.S. I, one, you know, want to emphasize when we
19 receive beans, does the farmer have organic sharpied on his
20 trailer? The non-retail transportation component is gray and
21 murky and complicated for my entity, particularly, and farmers
22 in general.

23 You mentioned that due by May 17th, is feedback from
24 the certifier community on how to handle some aspects of maybe
25 where the certifiers maybe disagree or have different

1 approaches. What is the follow up? What's the next step after
2 receiving that information back from the certifier community,
3 of May 17th?

4 DR. TUCKER: I -- there's going to be -- I think
5 there's already kind of an iterative process. I mean, just
6 last night I had a great conversation with a certifier who
7 asked the exact same question. Small farm, so here's the use
8 case, very, very small farm, only produces organic, only ships
9 to an aggregator who is 100 percent organic and is asking,
10 really? You know, the container I use to ship this 100
11 percent, from this 100 percent organic operation to that 100
12 percent organic operation. Really? I mean, so there are some
13 questions like that, really.

14 And so, this is where I want to really emphasize the
15 importance of the preamble. So I'm going to -- we're going to
16 go for the regulatory geeks in the room. We are often used to,
17 because, you know, we've had a bit of a gap between practice
18 standards here, we're used to reading the regs. What do the
19 regs say? Right?

20 And so, there might be a line in the regs that says,
21 thou shalt do this, thou must do this. The preamble explains
22 why that's important. And that's really the answer to sound
23 and sensible, that there is some regulatory discretion here.

24 Now, there's always going to be a call for
25 consistency, but I also want to remind us that different

1 businesses are different. All right? Different businesses are
2 different. And if I'm selling to a operation that has both
3 conventional and organic product, their fraud prevention plan
4 may be, yes, if I'm taking in anything, that non-retail
5 container must have the term, organic. Now, that does mean
6 that small farmer in that case may need to have that label on
7 because it's in the fraud prevention plan for their buyer.
8 There might be other small farms that have a different supply
9 chain. And so, we need to find boundaries.

10 We need to find business rules that people can
11 explain critical thinking criteria that can then be applied to
12 different environments. So, there's going to be a bit of a
13 conflict here between sound and sensible and everybody being
14 consistent, right? And I think we'll need to embrace that
15 dichotomy because different businesses are going to need to do
16 different things depending on risk in their supply chain. In
17 general, if you're at the beginning of the supply chain and
18 feeding into it, your burden really should be pretty low.

19 And one of the things we're strongly encouraging is
20 folks to talk to each other. How are you complying? Talk to
21 your certifier. Have that collaborative conversation.

22 I think there's also work happening in the accredited
23 certifiers association and other associations where they're
24 seeing these common business problems that we really need
25 communities of problem solving. The board is a great forum for

1 that. That also takes a while and I think that there are some
2 real time changes that can happen.

3 We're also working with NOP to make sure all our
4 auditors understand what sound and sensible is and what that
5 means when they go out for an audit. It's a culture change for
6 us too.

7 CHAIR SMITH: Thank you, Jenny.

8 Nate, please go ahead.

9 BOARD MEMBER POWELL-PALM: You mentioned this just
10 for a second there, Jenny. So I wanted to highlight one thing.
11 That when we were asking this question, how can we get better
12 at mass balances? And the community, certifiers, farmers, Amy,
13 for sure, said it would be really helpful to have acreage on
14 certificates. Again, the speed at which we were able to
15 accomplish that is incredible.

16 And so I wanted to just highlight how much iteration
17 happened between CACS asking, can we do this? And you giving
18 us a really clear path for what is the opportunity and where
19 are the boundaries. So I wanted to thank you for that
20 partnership and getting that across the finish line.

21 It was really exciting to get on OID, I don't know,
22 three weeks ago. Like, shoot, I can see everyone's
23 certificate. Maybe I don't have as many acres as I thought as
24 I looked at this. And it was great. So, thank you again.

25 DR. TUCKER: Thank you. I also -- we have an amazing

1 Organic Integrity Database team, so I haven't done a shout-out
2 for them, but so much of this work is possible right now. What
3 we're -- all those numbers went up on the screen only because
4 that team was able to field that technology last fall so
5 everybody could get in and start using it. And so, yeah, they
6 deserve an awful lot of praise for that as well. So, thank
7 you.

8 CHAIR SMITH: Allison, please go ahead.

9 BOARD MEMBER HUSEMAN: Thank you. We're really
10 excited about the nomination process being posted today, and
11 looking around this table, there are only four of us on the
12 board who are still here in a couple years, so we're really
13 excited to see a big, diverse team come in. And I'm wondering
14 if you could speak a little bit more to the process, what
15 factors are weighed in selection, and how we'll get a really
16 great mix of candidates in front of the secretary and what goes
17 into decisionmaking.

18 DR. TUCKER: Yeah, for folks who have not been around
19 this process before, again, strongly encourage folks to do
20 outreach, to encourage folks to apply. The call for
21 nominations does sort of lay out sort of the criteria for that.
22 We have a strong interest in organic expertise, organic
23 production, certification expertise. But we also have a strong
24 interest in equity and diversity. And so, what folks kind of
25 may not realize is that all of the call for nomination and the

1 rechartering of the board goes through a civil rights review.

2 And so as you are kind of reaching out to folks, you
3 want to think about kind of what is the areas of expertise on
4 the board that will be leaving. So look up, you know, who's --
5 raise your hand if you're leaving. So those are the sources of
6 expertise that we're going to be losing here.

7 But we also want to reach out to a broad set of
8 potential candidates who could really add diversity to the
9 conversation. So we will, in particular, we're looking to
10 increase representation in Indian and Alaskan Natives, Native
11 Hawaiians or other Pacific Islanders and persons with
12 disabilities. And so those are categories that civil rights
13 highlighted as areas where in general are underserved and are
14 underrepresented.

15 I would also, you know, encourage current board
16 members, if you have sources of diversity, so for example,
17 perhaps, you know, some type of hidden disability, you know,
18 you can always update your demographic information with
19 Michelle, because we do -- it's been brought up in previous
20 meetings that we have a whole lot of different sources of
21 intersectionality on this board, a lot of sources of diversity.
22 Not -- USDA's form doesn't necessarily include all those
23 different forms of diversity, but if you do have one of those
24 forms of diversity, we want to make sure that that's reflected.

25 CHAIR SMITH: Amy, please go ahead.

1 VICE-CHAIR BRUCH: Sure. Thanks, Kyla. Thanks,
2 Cindy, for your extended time here.

3 I have another question for you on discouraging
4 fraud. The penalties are clear domestically for those engaging
5 in organic fraud, dealings on prison and fines. Can you give
6 an overview of the equivalent enforcement levers that can be
7 pulled on international bad actors to level the playing field?

8 DR. TUCKER: Yeah, this -- I think we are getting
9 better at figuring out what those levers are and how to push
10 them. And so, for example, right now, we have a couple of
11 appeals cases, where -- these fairly recent cases, where
12 operations have been proposed: suspension or proposed
13 revocation in another country. I'll get to equivalents in a
14 second, but I think the question is also to the international
15 USDA, because that's also a question of how do we deal with
16 that.

17 And so, we are advancing a couple of cases to
18 administrative law judge hearings that involve operations in
19 other countries. We haven't done a lot of those, and it is a
20 complete -- it is a separate process, it turns out, because the
21 processes for serving, just getting the serving of the
22 documents to a foreign entity is a challenge.

23 In terms of equivalence partners, we need to work
24 with those trade partners, so if there is a challenge within
25 their country, that they are taking care of it. In fact, one

1 of the reasons we ended the India Recognition Arrangement is
2 that they weren't kicking out certifiers that really needed to
3 be kicked out, and there were fraudulent operations that they
4 had not taken action against. So, we're going to continue to
5 work with our trade partners to understand. We look at what is
6 the percentage of operations that have gotten kicked out. You
7 know, a fairly stable level is that certifiers in the U.S.
8 system kick out about one person -- one entity per day. So if
9 you ever worry about certifiers don't want to kick out their
10 clients, they can and do kick out their clients. So if you
11 keep an eye on suspensions, it's actually one of the things we
12 look at during audits is how many operations has the certifier
13 actually kicked out. And if they haven't kicked out many,
14 that's something that we drill into. We consider that an
15 element of risk.

16 Trade partners, again, there are benefits of these
17 equivalence arrangements but there are also challenges in that
18 we really are one to two step removed on the enforcement.

19 CHAIR SMITH: Okay, Jenny, I have a question for you.
20 A question came up during the comment webinar around how long
21 we would take to see an impact from SOE, and you shared in your
22 presentation some great early wins so that's really
23 encouraging. Kim made the analogy around an egg beater turning
24 the big SOE ship. I have my own personal opinions, but I don't
25 know if you'd want to share anything more about when the

1 community will really see or feel notable differences here
2 domestically.

3 DR. TUCKER: I think -- first, I'll say I have a more
4 positive view of SOE. I think it's way more than an egg
5 beater. I think that there's a whole lot of potential with SOE
6 and that we should exercise optimism and faith. So, a lot of
7 people gave a whole lot of comments to SOE and I think we need
8 to give it a chance to protect us. Okay. Give us a chance.
9 Give us a chance. I think it's more than an egg beater.

10 In terms of actual, so we know from -- I mentioned
11 but I want to repeat it. More than a dozen custom brokers who
12 have called us and said that they have rejected product as
13 organic and they have marked it as conventional because they
14 didn't have evidence of its organic status.

15 I -- other examples that are related to SOE, we're
16 seeing a big jump in trademark violation investigations. So,
17 over 20 percent increase so customs, this all works together.
18 It's not just one thing. And so, trademark protections,
19 customs has been actively doing that for us now for, it's been
20 almost a year at this point. They've blocked a whole bunch of
21 products, thousands and thousands and thousands of dollars.
22 The import certificate requirements gives them one more step.
23 So we have somebody in the targeting center that is now very,
24 very regularly getting calls from customs saying it's got the
25 seal but doesn't have a certificate. It doesn't have an import

1 certificate. We think it may be violating trademark. And that
2 product isn't held based on our authority or even the customs
3 broker authority. It's held based on CBP authority.

4 And those holds come with fees. So back to how do we
5 protect some of the market is when that product has to sit in a
6 warehouse and somebody has to write a check to CBP while it's
7 being investigated for trademark violations, that costs money
8 and that in itself is a deterrent. We are seeing the number of
9 those go up. So the trademarks work hand in hand with SOE.

10 I think those are immediate impacts. I think there
11 are also -- we're not getting a call from every custom broker
12 every time they, you know, mark something as conventional. But
13 to have those calls within the first couple of weeks, I think
14 is a signal that something's happening out there.

15 I want to make sure that -- you said up front you had
16 an opinion, so. You're sitting in the certifier's seat. What
17 do you think?

18 CHAIR SMITH: I think with most any rule it takes a
19 full inspection and certification cycle to really see the
20 impact of what's going on out there. Also, you know,
21 accreditation audits, as they're ongoing, I do think with these
22 three rules, there's been a bit of a change with getting more
23 information faster with those requests for information from
24 certifiers. So, I think that the program is able to act more
25 quickly against certifiers who are not implementing the rule

1 effectively or those -- all those rules, effectively. And more
2 will be revealed on accreditation audits. So those are my
3 thoughts.

4 I see a couple more questions. I just want to make
5 sure -- we are running a bit behind schedule so this is an
6 important conversation so I'm going to let it go on but I see
7 Jerry and then Carolyn and then I think we'll probably try to
8 wrap it up and then we'll take a break.

9 BOARD MEMBER D'AMORE: Thank you. To the questions
10 that you've just been asked, Jenny, I think there's another
11 aspect that you, yourself, or an example that you gave maybe
12 two years ago which is when you reach this stage of what we're
13 doing with SOE, it is frequently ill-advised to talk about your
14 successes and, you know, methods and practices and what's going
15 on. It's going to take a while for even -- things that are
16 happening right now that will not be spoken about for quite
17 some time is the way I guess I put it. And you don't have to
18 comment to that. That's just a thought.

19 DR. TUCKER: Thank you for the comment, Jerry. Thank
20 you.

21 CHAIR SMITH: Carolyn.

22 BOARD MEMBER DIMITRI: I'm very sorry to change the
23 topic here, Jenny. This has all been fascinating but I -- you
24 know, self-interest always prevails.

25 So I was just at the project directors meeting for

1 the OREI and Matt put up this beautiful slide with like OREI
2 priorities that came out of the farm bill when the funding
3 program was established, and then some other lists. And then
4 he had this list of two NLP priorities and one was methionine.
5 I don't know how to say it. Some methionine, that, and then
6 some other word that I just kind of, something that made not
7 very much sense to me either as an economist. So do you know
8 anything about how those NOP priorities get set for the OREI?
9 Thank you.

10 DR. TUCKER: We do have a process for making sure
11 NOSB resource priorities get over to NIFA. So National
12 Institute for Food and Ag. They are very much an independent
13 agency. I think they came to a meeting a few years ago. I
14 think -- Michelle, you've been here for 24 meetings. Do you
15 remember which one that was? And I think they shared some of
16 the challenges there.

17 We're not involved in that process. We do transmit
18 the board priorities to them if we kind of want to invite them
19 back for a future meeting. That might be something we could
20 do.

21 BOARD MEMBER DIMITRI: I mean I'm aware of the NOSB
22 priorities, but these said NOP priorities. So I'm going to ask
23 Matt and I'll get back to you.

24 DR. TUCKER: I, yeah, clearly I'm doing the best I
25 can here, but yeah. I think, yeah. Sorry.

1 BOARD MEMBER DIMITRI: That's okay.

2 CHAIR SMITH: Ok. We are going to take a break. We
3 are going to come back at 11, whatever 15 minutes is. I can't
4 do quick math in my head. 11:38. Is that right? 11:40.
5 Great. 11:40. Okay. Great.

6 BREAK

7 CHAIR SMITH: Okay. Great. We're going to now hear
8 from our Midwest TOPP partners and I'm going to turn the mic to
9 Jenny to introduce the Midwest TOPP lead.

10 DR. TUCKER: So this has become a very nice or
11 standard part of the National Organic Standards Board meeting.
12 This is the third time we've done this. It's the third unique
13 region that we have been to. So we have heard from the
14 southeast TOPP region when we were down in Atlanta. Then we
15 heard from the northeast TOPP region when we were oh my
16 goodness, where were we? Providence. And it's been a really
17 nice cadence of being able to introduce the regional lead who
18 then kind of runs the show in talking about what's happening in
19 the region.

20 So we are today in the Midwest TOPP region and so it
21 is my pleasure to introduce and then turn the mic over to Cori
22 Skolaski. So Cori, wave, yay.

23 Cori is the Executive Director of MOSA Certified
24 Organic. She joined MOSA in 2013 after serving as the
25 Executive Director for Habitat for Humanity in La Crosse for

1 ten years. She has a lot of experience in servant leadership,
2 organization management, and advocacy. If you take a look at
3 Cori's LinkedIn profile, you do an awful lot of volunteer work
4 and outreach. It's really impressive. So, I think I sent you
5 a connection request so we can -- there you go.

6 It was great to learn more. It's just a good
7 reminder of how everyone in the room has, you know, diverse
8 interests and serves their communities in different ways, so.
9 Cori and her family live in Viroqua, Wisconsin where she fights
10 off rabbits as she tends to a large garden.

11 I do also want to do a shout out to Allison who is
12 sitting next to Cori there. Allison, wave. You know, I have
13 gotten -- I had the pleasure of getting to know Allison. I
14 went out to the -- it was Iowa, right, the Organic Conference.

15 And I listened to Allison. She was sitting at a
16 round table and the guy sitting next to her was clearly a
17 skeptic. He opened the conversation and said, I'm not doing
18 organic. And so, he was basically begging to be argued with.
19 Man, does she do a beautiful job, kind of getting into the
20 pipeline of, well, yeah, I get that concern. And yeah, here
21 are all the other reasons people don't want to do it. And so,
22 acknowledging those concerns but then also saying, here are
23 some things you should know. And you know, here are some
24 things to be aware of.

25 And so, I was impressed by her ability to do that

1 very gentle sort of sales job in the moment. To the point
2 where I watched, he actually took a brochure. And I thought,
3 you go, girl. And so, yeah, those stories are happening across
4 our regions, across our partners, every single day. And so,
5 I'm going to turn it over to Cori to tell the story of the
6 Midwest TOPP Program. So, welcome and thank you for all the
7 work.

8 MS. SKOLASKI: Thank you.

9 DR. TUCKER: Oh, let's applaud.

10 MS. SKOLASKI: We're trying to get those slides to
11 move to advance.

12 MIDWEST TRANSITION TO ORGANIC PARTNERSHIP PROGRAM (TOPP)

13 PRESENTATIONS

14 CORI SKOLASKI, MOSA

15 MS. SKOLASKI: Well, thank you very much to the
16 members of the National Organic Standards Board for your good
17 and hard work. The time and talents that you give to this
18 group, it does not go unnoticed and I appreciate it very much.

19 Thanks also to the -- our friends at the NLP for
20 their diligence and vigilance. There's definitely been more
21 staff and we appreciate your commitment to organic integrity.

22 This year, MOSA celebrates its 25th anniversary. We
23 were formed in 1999 by Dave Engel, one of the organic pioneers
24 in the industry. After MOSA, he went and started NICS as well.
25 Both MOSA and NICS are located in Viroqua, Wisconsin, about

1 three hours due west of here on the other body of water, the
2 Mississippi River.

3 We currently have -- since the pandemic, MOSA became
4 completely virtual and we have 44 staff that live in 10 or 12
5 states and three countries. We work with about 50 contract
6 inspectors annually and we have over 1,800 clients.

7 On August 26th, 2022, a date that will live in infamy
8 in my mind, I met with Jenny Tucker and she explained the
9 organic transition initiative, specifically TOPP, and told me
10 that MOSA had been chosen as the Midwest team lead. So we're
11 overseeing 11 states. And in 67 days, by October 31st, we had
12 submitted our statement of work for \$15 million and we had
13 hired Allison Walent as our program manager, director.

14 I missed this slide. This is my pretty staff. So,
15 the TOPP program is going and growing. It's really impressive
16 in such a short period of time, since October of '22 until
17 today, the connections that have been made, the partnerships,
18 and how robust the program has become. And I think that's a
19 testament to the excellent regions and their leads. It's --
20 we're working very collaboratively with each other and it's
21 paying off. It shows.

22 And specifically, the Midwest region is doing great
23 because of Allison Walent. Go ahead, Allison.

24 ALLISON WALENT, MOSA

25 MS. WALENT: Thanks, Cori. Good morning, everyone.

1 My name is Allison Walent. I'm new to MOSA for the TOPP work.
2 So, thank you, Jenny Tucker, for creating a position for me and
3 all.

4 I also really want to say thank you for the
5 opportunity today to share about our work and a little bit of
6 what we've been doing with Midwest TOPP. And we're going to
7 talk a little bit about Midwest TOPP as an overview and then
8 I'll provide that. And we're going to have an opportunity to
9 meet some of our core partners across the Midwest without whom
10 we wouldn't be able to do this important work. So, our partner
11 from Iowa Organic Association, Roz Lehman, will be talking
12 about the community building pillar. The -- Jacqueline Evers
13 from the Illinois Land Connection will be speaking about
14 technical assistance. Marbleseed is going to talk a little bit
15 more about the intersection between two legs of OTI, the NRCS
16 Organic Management Practice Standard 823 and TOPP. And then
17 Kenya Abraham from the Organic Association of Kentucky will
18 lead us through some information about mentorship.

19 And then, hopefully, if everything's working okay,
20 we'll have a video of a mentor pair. We're having a few
21 technology issues so if that doesn't work, we'll send it to you
22 afterwards. But then we also have a mentor pair here in person
23 to tell a little bit about their story. Of course, we'll give
24 some opportunity for questions.

25 So, as you probably know, Midwest TOPP is, and TOPP

1 generally, is grounded by five program areas: mentorship,
2 community building, technical assistance, workforce
3 development, and data and reporting. And through these areas,
4 we continue to support farmers as they transition their
5 operations to organic production methods. The Midwest TOPP
6 region is 11 states: Minnesota, Iowa, Missouri, Arkansas,
7 Wisconsin, Illinois, Indiana, Ohio, Michigan, Kentucky, and
8 Tennessee. Was anybody counting? I think I got all 11.

9 Though -- but the work that TOPP is accomplishing is
10 really only possible through the relationships that we've
11 formed. And Cori mentioned the partnerships that we've formed
12 with our other regional leads who are my fan club in the back
13 of the room there. So, shout out to each of the other five
14 regions. We have really formed trusting relationships that
15 allow us to have difficult conversations and navigate through
16 program implementation in really creative and collaborative
17 spaces.

18 Similarly, I couldn't do this work without our
19 partners in the Midwest. So the way that we started out this
20 program is we identified a core partner in each of our 11
21 states, many of whom are here. So if you are a core partner in
22 the Midwest, if you could please stand for just a moment.

23 (Applause)

24 MS. WALENT: So it's these folks, and then, of
25 course, our new emerging deeper relationships with our national

1 partners. So if you're a national partner, if you could please
2 stand for just a second too.

3 (Applause)

4 MS. WALENT: But it's really -- it's these
5 relationships that are forming and coalescing that are allowing
6 us to do the really difficult work and reach all communities
7 throughout the United States, not just traditional agriculture,
8 but all historically underserved communities and those that
9 need a little more opportunities put before them.

10 It's also the relationships that go largely unnoticed
11 and undocumented. They're the soft, squishy things that are
12 really difficult for us to report on. But with that, as I
13 said, the Midwest is really a coalition of partners, and on
14 this slide you can see who some of those core partner
15 organizations are. But beyond these core partners, each one of
16 these partnerships has an additional somewhere between three
17 and seven partnership organizations that are leading the work
18 in their states and regions. And it's through these
19 partnerships that we're able to accomplish so much work in such
20 a short amount of time.

21 And what exactly is that work? So we're going to
22 look at a few numbers here for those data people. We have 63
23 matched mentorship pairs, so that would be actually 116 or is
24 that the right math? I'm an English major. Matched pairs,
25 which means we have those folks working throughout the region,

1 bringing in approximately 6,262 acres into organic production.

2 In addition to those matched pairs, those are folks
3 that have signed agreements to work with one another, we have
4 98 mentors waiting to be paired, and 124 mentees looking for a
5 mentor. So we've got another, you know, about another 12,000
6 acres roughly in the pipeline for the mentorship program.

7 Since the 1st of January, we've had 44 events. These
8 44 events would be mostly, at this time of year, conferences
9 and workshops, but also webinars and roundtable discussions,
10 and we're just launching into field season, so we'll be seeing
11 a lot more field days and active on-farm events also.

12 Through TOPP, we've supported 198 producers with
13 technical assistance. So, technical assistance defined by one-
14 to-one organic system planning support, questions about
15 becoming organic or implementing organic practices on their
16 farm. This 198 is beyond the 63. So we -- this is an area of
17 the program that we do hope to grow. And as we continue to
18 define our tracking mechanisms for technical assistance, we
19 expect to see a significant growth in this space.

20 At those events, those 44 events, we have touched
21 4,847 people, so we're spreading the word of Midwest TOPP and
22 TOPP generally as rapidly as we can, excuse me, at these events
23 and through other avenues. In the Midwest, we've created 61
24 resources for organic producers. These 61 resources include
25 podcasts, fact sheets, webinars, you name it. And we are

1 actively collecting more and more resources, which can always
2 be found on the organictransition.org website, also work by the
3 TOPP regional leads.

4 And lastly, the last stat that I want to give today
5 is we have trained 142 organic professionals. So some of this
6 is a result of giving presentations on the Transition to
7 Organic Partnership Program through a partnership with the NRCS
8 and their state training programs. Specifically we did that in
9 Tennessee and Arkansas. But this is also providing support to
10 extension agents and other folks working in the organic
11 community to build their organic acumen as they continue to
12 support farmers as they transition to organic.

13 So, if we look at the number of mentees that we have
14 committed today and those that are in the pipeline, so that
15 would yield approximately 190 farms, and we extend that to the
16 next three years of the program, we really think that we'll be
17 impacting growth in the Midwest region by about 8 to 9 percent.
18 So we're really excited about that.

19 Our goal is 10 percent. We talk a lot about with our
20 partners what would it look like to increase organic acres by
21 10 percent when we know that the relative growth over time has
22 been 1 to 2 percent.

23 And how is all this work getting done? I alluded to
24 it earlier, but it's through relationships and collaboration.
25 It's through relationships with all of our partners. It's

1 really listening and understanding where each of us is coming
2 from. We're creating new jobs, bringing training and
3 community-building opportunities, providing one-to-one
4 technical assistance, and building a network of mentors and
5 mentees. And it's only possible through these relationships
6 that we're able to do so.

7 And with that, I'd like to turn it over to Roz Lehman
8 from the Iowa Organic Association to really dive into some of
9 the work that's been done in the Midwest.

10 ROZ LEHMAN, IOWA ORGANIC ASSOCIATION

11 MS. LEHMAN: Thank you, Allison.

12 Can you guys hear me? I want to thank you all for
13 your time and leadership to support and strengthen the National
14 Organic Program. The Iowa Organic Association and the organic
15 farming community in Iowa are very grateful for the USDA's
16 increased attention and investment in providing much needed
17 technical and financial support to expand organic across the
18 United States. Forgot about the slides.

19 Our organization -- our mission is to advance organic
20 agriculture and food systems in Iowa, and we have -- we were
21 established in 2006. We have a very diverse membership, so
22 we're not just farmers. We are a broad group of supporters
23 that includes farmers, farm and food businesses, gardeners,
24 consumers, anyone that's interested in championing the organic
25 movement. And we do this work through a lot of different

1 programs and activities. What we focus on heavily is
2 education, so we're doing webinars and field days, workshops.
3 We're reaching out to students on college campuses and
4 providing the tools and resources and support to -- so they can
5 pursue organic.

6 We are finally able to add a little bit of additional
7 technical assistance to our work through the TOPP program. We
8 were able to hire an organic farm advisor who can provide that
9 point of contact support to farmers looking for information and
10 resources on organic. But then, additionally, that organic
11 farm advisor is leading our organic mentorship program. We
12 conduct quite a bit of outreach, whether it's in-person
13 conversations at conferences and events, but we're sharing
14 information out like many of our partners do, just through the
15 e-newsletters, direct mail, working through stakeholder partner
16 groups, etc. And then advocacy.

17 We work really hard to connect policy leaders to
18 organic practices and the benefits of organic and the resources
19 that the Congress and the USDA is providing to the organic
20 community. What's really important for us is to try to get
21 those policy leaders out to a farm and talking to a farmer so
22 they can actually see first-hand what we're talking about.

23 And then community building, I think, is wrapped up
24 in all of the work that we're doing, especially in terms of the
25 goals laid out in TOPP. It's just -- it's weaved into all of

1 those priorities. But to foster connections, coordinating
2 events, and sharing those resources among that community.

3 And okay. I wanted to give you just a little bit of
4 background on what organic agriculture looks like in the state
5 of Iowa. As of the last census, we -- or the organic survey,
6 we were ranked 6th in the United States in organic production.
7 We are the top producer of organic corn, soybeans, and hogs.
8 Approximately 170,000 acres in organic with 779 farms and 1,000
9 certified operations.

10 So, community. So, community has been a factor in
11 the growth and success of the organic movement. It provides an
12 important source of shared knowledge and experience that is
13 lacking across agricultural sectors. It also provides a social
14 connection, creating a space to bring people together with
15 similar goals and passions, especially when the nearest organic
16 neighbor is possibly hundreds of miles away. IOA is working
17 both through TOPP and other initiatives to develop a range of
18 opportunities and resources to expand connections, knowledge,
19 and community among a broad group of stakeholders -- diverse
20 stakeholders.

21 So some of the work that Iowa and IOA has been doing,
22 in collaboration with our TOPP partners, we did launch our
23 organic mentorship work in January. So since January, we've
24 done 25 intakes and interviews. We have six cohorts with eight
25 mentors looking for mentees. So we're busy looking for

1 additional mentors -- mentees to pair with those mentors.

2 We're developing events that are focused on the
3 issues and topics that are important to those folks
4 transitioning, those mentor cohorts. And we're developing some
5 regional opportunities for farmers to coffee chats, to get a
6 regular meeting where they could get together in their
7 community to talk about what's happening on their farms or what
8 they need to succeed. And I would say some of those additional
9 activities, we're doing some technical workshops, and then with
10 our mentorship program, we have established a monthly webinar
11 series to focus on the topics that are important to those
12 growers.

13 We've been actively engaged with the Iowa NRCS office
14 over the last couple years. We deliver an annual training to
15 their team leads, talking about the basics of organic, and then
16 we're delving into topics that are important to them in terms
17 of what types of questions are coming into their county
18 offices. And we've also been very helpful in promoting and
19 supporting the Organic Management Standard 823. In the state
20 of Iowa, we've had 45 applications for transition applications,
21 and we've had 14 certified producer applications since the
22 start of the program. I have a fact sheet on that about a lot
23 of those details if anybody is interested.

24 And then the college visits. We think it's really
25 important to be speaking to the students at colleges and

1 universities, just scratching the surface on what organic is.
2 We're talking to students in agriculture, conservation, and
3 environmental courses. Nobody else is talking about the
4 benefits of organic, or what organic is, or what these
5 practices entail. I'm in Iowa, so we have a lot of
6 conventional agriculture, so I think it's a really great space
7 to be talking to the next generation about what organic
8 agriculture can do. So far, we've had 10 visits at the college
9 and universities this spring, and we've reached over 150
10 students.

11 There is an abundance of untapped organic information
12 and expertise in organic farming communities across the
13 country. IOA and TOPP are collecting and channeling these
14 resources to inspire and encourage greater interest and success
15 in organic production. And we look forward to continuing to
16 provide the support and resources for this growing movement.
17 Thank you, guys.

18 MS. WALENT: Thanks, Roz.

19 And Jacqueline Evers from the Illinois Land
20 Stewardship.

21 JACQUELINE EVERS, THE LAND CONNECTION

22 MS. EVERS: Good afternoon. Thank you all for giving
23 this opportunity to share about our work in TOPP. So, as
24 Allison said, my name is Jacqueline Evers. I'm the director of
25 the Land Connection. We're a non-profit based in central

1 Illinois, and our work primarily centers on providing resources
2 and education to farmers, food businesses, and eaters. And
3 specifically, we do that through farmer training programs,
4 consumer education, food access and food security programming,
5 farmers markets, and farmland access services.

6 So today, I'm here to share about our TOPP work,
7 specifically in technical assistance and workforce development.
8 Those are two areas our organization does not often work in, so
9 we connected with Rodale Institute, as well as the Organic
10 Agronomy Training Service to accomplish deliverables under both
11 of those priorities. Under the technical assistance priority,
12 Rodale Institute has expanded their organic consulting services
13 in Illinois. Their consulting program is designed to support
14 farmers with a mentor during their transition to organic, who
15 provides on-site consultations, assistance with organic systems
16 planning and certification, record keeping guidance, inspection
17 preparation, and more. In quarter one of this year, which is
18 when their work has really begun in earnest, though they did
19 support some farmers in quarter four, their two consultants
20 covering Illinois are working with eight farmers to transition
21 organic, and that covers a total of 9,500 acres. Those farms
22 are primarily grain, but two also have livestock. And the
23 challenges the consultants are addressing with that group of
24 farmers include the need to find markets for food grain,
25 organic grain, weed control, disease management, financing,

1 managing their landlords, and tillage usage in an organic
2 system.

3 The consultants will support those farmers in myriad
4 ways, which could include helping them calibrate equipment,
5 working through their transition plan, planning their cover
6 crop systems, and more. And over the course of this year,
7 Rodale will serve 20 farmers through the TOPP program in
8 Illinois, though they will be building relationships with many
9 farmers beyond that set.

10 The Organic Agronomy Training Service, or OATS, is
11 working on workforce development, and OATS is working to grow
12 domestic organic production by strengthening the educational
13 support network of agronomists, certified crop advisors,
14 extension agents, and technical service providers. Their first
15 program in Illinois for TOPP was to conduct a needs assessment
16 for agricultural advisor training. The results from that needs
17 assessment will describe the topics, crops, and training
18 modalities preferred by that audience. And though the needs
19 assessment has not fully concluded, the early results indicate
20 that the strongest preference for types of training are
21 instructional videos, webinars, and online courses with live
22 video meetings.

23 The strongest interest in topics are annual
24 vegetables and fruits, as well as perennial fruits and nuts.
25 There was a strong interest in every topic related to organic

1 that was listed in the assessment, and those included crop
2 rotations, weed control, cover crops, tillage, fertility
3 management, and transitional support. And finally, within NOP
4 regulatory compliance, those surveyed to date had a strong
5 interest in learning more about allowable and prohibited
6 substances, writing an organic systems plan, and navigating
7 organic certification and inspection. So once completed, that
8 survey will allow OATS to best determine which programs they
9 want to pursue in the coming year for agricultural advisors,
10 and then they will complete another needs assessment in 2025 to
11 inform their work in 2026.

12 Beyond those two priorities, we're seeing ongoing
13 success with our mentorship and community building programs,
14 and we are really excited about the opportunity the TOPP
15 program brings to Illinois for more information and services
16 around organic. So, thank you.

17 (Applause)

18 MS. WALENT: Thanks, Jacqueline.

19 And Lori Stern with Marbleseed.

20 LORI STERN, MARBLESEED

21 MS. STERN: Good morning. Just want to again echo
22 the thanks to the board. It's great to have everybody here in
23 Wisconsin and Milwaukee which is the town of my birth. So
24 thank you for that.

25 Obviously, we're Marbleseed. Cover the upper

1 Midwest, but I am from Wisconsin. I live in Green County and I
2 just wanted to give a shout out for we are number one in cheese
3 in Wisconsin. So, I know I have an esteemed colleague here
4 from Kentucky, but I would say that we are to cheese like
5 Kentucky is to bourbon, and particularly in the county where I
6 live, so.

7 All right. So now I have to learn how to work this
8 thing. Is that what's going to happen next? Is it this way?
9 The button that's worn down.

10 So many of you may know us as the organization,
11 formerly MOSES. So we are Marbleseed, rebranded, but our
12 mission remains the same. And so I just wanted to give a
13 few -- a little bit about key areas of work. So basically
14 these are areas of work that come out of our strategic
15 planning. So, farmer self-organizing. So we are continuing to
16 be farmer-led.

17 We're thinking about ecosystem services so we love
18 the TOPP work because it's very much partnership-based. So
19 thinking about organic as a system and farming and we're
20 thinking about how we do this work in partnership. Fair trade
21 principles and domestic markets, so interesting conversations
22 about SOE and other things and how do we continue to increase
23 farm viability by doing more sourcing locally and from the
24 United States. Access to land and capital is another area that
25 we work. And then supporting local human-scale farm and

1 enterprises. So again it was great to hear conversation and
2 concern about impacts of some of these amazing policy
3 initiatives on small farms.

4 So the way that we accomplish this work is very
5 similar to a lot of the other organizations that are involved
6 in TOPP. We have had an ongoing farmer mentorship program for
7 the last 17 years. So it was great, as TOPP came online, to
8 see how it integrated with a lot of the programs that we
9 already had in place. And it was a way to deepen and
10 strengthen those relationships specifically around organic
11 transition. Field days, we have the new Farmer U which is kind
12 of a retreat for beginning farmers. Technical assistance in
13 organic transition including information on production and farm
14 and business topics. And then, of course, many people know us
15 as the Upper Midwest Organic Farming Conference. We had --
16 just had year 35 and we are still the largest organic farming
17 conference in the country.

18 Did we skip? Or did I skip? All right. Well, we'll
19 just go. There's a slide missing but we'll just keep going.

20 So we also -- I wanted to say that we are extremely
21 committed to doing direct resources to farmers. And so
22 education is so critical. We know that. That is a key part of
23 our mission. But we've also made a commitment to doing what we
24 can in terms of finding programs and grants that directly
25 resource farmers. And the TOPP program is a way to do that

1 particularly as we wander toward conservation as we think about
2 support and transition.

3 So we have been doing the direct resources to farmers
4 through our Wisconsin Local Food Purchase Assistance program.
5 We've done farmer mini-grants, supporting farmer incubators and
6 then, of course, increasing access to conservation programs
7 specifically for organic. So this slide basically shows kind
8 of here, the farmer education pieces that we do. Then the
9 mentorships, obviously one-to-one relationships.

10 We've also, after 17 years of doing mentorship
11 programs have recognized that a lot of the time mentors are a
12 resource for accessing other USDA programs which also fits
13 really nicely with TOPP, again as we move toward thinking about
14 how conservation can support that organic transition period.

15 And so, NRCS staff training, we've been doing some of
16 that. We have -- obviously we're number two in Wisconsin for
17 organic farms and so we have a very supportive NRCS at the
18 state level. They fund a position that sits in our
19 organization but actually has an NRCS computer and that's Tom
20 Manley. He is in the room so if anyone has NRCS-specific
21 questions, you can ask Tom. But it's just been incredibly --
22 it's been amazing to have that partnership with our state
23 office and recognize how important they see organic expertise
24 is, even beyond TOPP. So we were really ready when TOPP came
25 on board. And then obviously one-to-one farmer support on

1 planning activities. Tom's role is really about supporting
2 NRCS staff but in that support and developing the case study,
3 some of this is coming out of his work as well, is working one-
4 on-one with farmers and kind of demonstrating how that work
5 happens.

6 And then, oh, that's what happened. So that slide
7 there. Wave at the farmers from LFPA.

8 So, ultimately, we want to nurture farmer heroes to
9 grow and build our food system. We're very much -- we also do
10 some work in Climate Smart. We have a staff member at that
11 meeting right now in Nashville. But recognizing that organic
12 is Climate Smart agriculture and doing what we can to do due
13 diligence in supporting that message.

14 And I think Allison had asked -- we just got out of
15 order I think. No. Should I just keep going?

16 All right. I'm going to try and read from my notes
17 here just because there was a question about historically
18 underserved and particularly, NRCS. And so as I looked at the
19 data coming into this meeting, obviously it's been mentioned
20 that there's variability across the country in terms of working
21 with NRCS and particularly around OTI. We have a huge
22 commitment to really working with historically underserved
23 producers.

24 We've got a mentor pair right now that are both
25 native Hmong speakers and a field day that is planned in Hmong

1 language. We have a lot of Hmong farmers in Wisconsin that are
2 interested in organic transition.

3 So I -- it was exciting to see as I looked at the
4 data, at least with NRCS, that Wisconsin and it has a pretty
5 high rate. We're ranked 10th in terms of EQIP applications and
6 those that are funded and as we think of EQIP as NCSP, again
7 prior to OTI, as ways in to NRCS. Particularly for organic
8 farmers, that was nice to see. And it looks like historically
9 underserved in Wisconsin, at least NRCS programs, 20 percent of
10 those successful applicants are from historically underserved
11 communities. So I think that was a question that people were
12 curious about. And we're really looking forward to how this is
13 going to roll out, the interaction with NRCS for OTI to be
14 successful in supporting farmer transition. So, thank you.

15 (Applause)

16 DR. TUCKER: Allison, can I just jump in really,
17 really briefly? You know, I realized before when I was talking
18 about NRCS that because we do get, you know, so many concerns
19 about it, I did kind of focus on the fact that there are people
20 out there who don't know organic or aren't pro-organic or
21 whatever. But there are also some NRCS folks out there doing
22 really, really good work and I do want to make sure that we in
23 the program acknowledge that. That we all tend to focus in on
24 what's -- you know, where the challenges are and that's a
25 challenge that I know a lot of public commenters brought up.

1 But I do think there are regions where those bridges are
2 getting built very nicely. So, yeah.

3 MS. WALENT: Thank you. Thanks, Lori.

4 Kenya from Organic Association of Kentucky.

5

6 KENYA ABRAHAM, ORGANIC ASSOCIATION OF KENTUCKY

7 MS. ABRAHAM: Good morning, everyone. My name is

8 Kenya Abraham, and it is with gratitude that I present this

9 piece of the TOPP initiative, the Organic Mentorship Program.

10 On a personal level, I can speak to the benefits of
11 mentorship and how it can bring equity through workforce
12 development. Oh. Please, when I tap the table.

13 I sit before you today as the Organic Transition
14 Program Manager at the Organic Association of Kentucky because
15 of my time as an organic inspector. And during that time, I
16 had three amazing mentors, one being Nate Powell-Palm, Garth
17 Hall, and Andrew Black. And because of that, I've taken
18 opportunities to continue on to my path into this industry.

19 The mediocre mentor tells. The good mentor explains.
20 The superior mentor demonstrates. And the greatest mentors
21 inspire. It's no wonder that mentorship is the cornerstone of
22 the TOPP program. And on January 18th -- I'm sorry, I'm having
23 trouble with my notes. Okay.

24 On January 18th, OAK kicked off Kentucky's TOPP 2024
25 cohort with 12 mentorship pairs. Our pool of mentors are

1 certified organic rock stars like Mac Stone and Jesse Frost and
2 many others who have stepped up to the plate. Most of my
3 mentee farmers are in their third year of transition, and
4 they're mostly ready to work on their OSPs.

5 Having a good coach and a support team through this
6 process makes a difference in how things are going to turn out.
7 I can say that all of my mentee farmers are worthy of mention
8 today, all of them. However, I'm only able to highlight a few.
9 They gave me five minutes, so hang in there.

10 We're going to go with March Magic and Brian and
11 Elizabeth. So, last month, I embarked on a journey to South
12 Central Kentucky to check in with two mentee farmers while
13 being hosted at the Farm Repair Organic Mentor, Robin Virgin.
14 The mentees came prepared with an array of questions. The
15 mentor was informative with her work demonstrations and they
16 were inspiring. The mentorship visit did not fall short on the
17 day's logistics, which included a fantastic farm tour and lunch
18 with neighboring, long-term organic farmers.

19 While lambing season may feel much like March Madness
20 on some sheep operations, I've been there, I've been one of
21 those, these mentee farmers experienced March Magic when they
22 were at these farms. I was able to note that the TOPP mentor
23 was able to coordinate a visit that spent time putting the
24 transitioning farmers and needs into perspective. She offered
25 feedback and she served as a sounding board.

1 The mentor also identified other expert farmers that
2 these mentees could connect with and activities they could
3 engage in to help them identify small ways to position their
4 work and meet their goals. This mentor also shared
5 relationships, resources, and she worked together with them on
6 their OSP. These mentees are off to a great start in year one
7 of their organic transition.

8 Next we'll go through the fire with Denise. I heard
9 that April showers bring May flowers, but in Kentucky, it
10 usually brings really bad storms and hardships. Just two weeks
11 ago I had a mentee email me that her barn had caught fire.
12 That she had lost everything, her new well-pump house,
13 materials, poultry, her beloved dog and its puppies. She was
14 just completely devastated. She said in her email that she
15 didn't think she would be a good fit for this program anymore,
16 that she just felt like quitting. She's precisely in the third
17 year of her transition and right now is like the best time, the
18 most time that she's going to have to -- it's critical for her
19 to push harder. Her mentor, Maggie Wilder, is coaching her
20 through what the song says, down to the wire, even through the
21 fire.

22 Denise is pushing through what many would see as
23 their limit. Transitioning often involves more than just
24 converting acreage over on OSPs. It comes with challenges and
25 hardship. In this role, we're finding that our work can be

1 vital to the life of the farmers. Next, please.

2 And next, we're going to be juggling with Jessica.
3 There are also the mentees who are like what I call in between,
4 because financially they lie in between two extremes, and I
5 mean in terms of like state and time. It's a constant juggling
6 act of resources for help, as often there's more month for them
7 than there is money.

8 So this is Jessica, our mentee, who was presenting
9 about her farm, and also about being a TOPP mentee at Kentucky
10 State University at an event. And that's her high tunnel that
11 earlier on, that first picture, she was using for storage
12 mostly, and now she's converting that high tunnel to a
13 certified organic operation.

14 It's been an honor to juggle with farmers like
15 Jessica, who have needed help with technical assistance from
16 our team and management plans and record keeping and more.
17 I've witnessed the changes and the progress happening on our
18 mentors' -- mentee farms, and in this mentorship program, we're
19 committed to supporting the mentees and helping through each
20 part of this process.

21 And I've told you what I see on these farms and in
22 this program, but now I will tell you what I don't see enough
23 of. And that's equity with BIPOC farmers. Most Kentucky black
24 farmers are not participating in the TOPP program. The USDA
25 will need to take many steps to restore the condition of black

1 farmers before we can even expect for this to happen.

2 So, therefore I'm very proud -- I'm so proud to be
3 able to say that I do have Ms. Evelinia (phonetic), one farmer,
4 Ms. Evelinia, enrolled in our Kentucky TOPP program. We can
5 talk more about that later in the questions if you guys would
6 like. That's all.

7 MS. WALENT: Thank you.

8 MS. ABRAHAM: Thank you.

9 (Applause)

10 MS. WALENT: Thanks, Kenya.

11 With luck, our video will play, highlighting our
12 mentor pair from Iowa.

13 (Video recording played; transcribed as follows)

14 WENDY JOHNSON, JOIA FOOD FARM

15 BOARD MEMBER JOHNSON: Hi. My name's Wendy Johnson
16 and I own and operate Joia Food Farm here located in northeast
17 Iowa. This farm is a perennial-based farm where we grow
18 organic grains, graze sheep and cattle, and poultry, and grow
19 fruit and nut trees, raise some pigs, and feed our local and
20 regional communities with healthy food. We believe that food
21 should be chemical free and raised humanely and so we started
22 our food farm and transitioning to organic in 2014.

23 I grew up in Iowa on a conventional corn, soy, and
24 hog farm in the 1980s. I really didn't see farming as a path
25 forward for me. My experience from that era actually helped

1 motivate me to move as far away as I could from Iowa. And so
2 after college, I moved to Los Angeles, California, where I
3 started a career in the fashion industry.

4 But unbelievably, while I was there, I learned about
5 our food system, about how chemical dependent our food system
6 is, and how inequitable it is. And I started growing my own
7 food, cooking more and more, and learning about the power of
8 community. And so I decided I wanted to grow food at a
9 different scale, and more than just for myself, but for others.
10 And I had this really great opportunity to farm in Iowa.

11 So I moved back in 2010, and that's when I started my
12 farming career. I spent the first few years learning from my
13 dad how to grow corn and soybeans conventionally. And once I
14 had that baseline, I reached out to organizations in Iowa that
15 had organic farmer members to learn from them. And those
16 initial farming mentorships were invaluable to my farming
17 career. I had mentorships from organizations like MOSES, now
18 Marbleseed, and Practical Farmers of Iowa, which also opened
19 opportunities for learning from many other farmers through
20 field days and workshops. And that's when I realized that then
21 I was part of a community of farmers, something that I felt was
22 missing in the conventional world.

23 So I wanted to be a TOPP mentor, excuse me, to
24 provide the same kind of support that was given to me when I
25 first started organic farming. Farmer-to-farmer learning is an

1 incredible way to learn. And to have that one-on-one with --
2 for conversations and ability to ask those questions, it's that
3 experiential time of making mistakes, knowing that those
4 mistakes are completely normal and are part of the learning
5 experience. But having a mentor to talk things through with
6 and ask questions and provide support, I think is incredibly
7 essential. So when I learned about the Transition to Organic
8 Partnership program, I applied right away to not only give
9 back, but also help grow the organic movement and support the
10 next generation of organic farmers and growers, because the
11 world needs more farmers.

12 JEAN WIEDENHEFT, INDIAN CREEK NATURE CENTER

13 MS. WIEDENHEFT: Hi. I'm Jean Wiedenheft, Director
14 of Land Stewardship at Indian Creek Nature Center in Cedar
15 Rapids, Iowa. I've been with the Nature Center since 2001, and
16 I became a farm manager back in 2016. The Nature Center
17 focuses on ecological health of land and educating others on
18 ways people can live more sustainable lives. So the principles
19 of organic farming that focus on soil health and reducing
20 harmful chemicals are integral to our mission as an
21 organization. And transitioning the total acres away from the
22 corn and soybeans to healthy foods people can actually eat is
23 also integral to the mission.

24 Last summer, my farm manager, who was overseeing the
25 organic acres, told me it was time to take the last of the

1 conventional acres over, and I agreed, but I totally lacked the
2 knowledge of what to do with those acres and how to do it. So
3 the Iowa Organic Association and our mentor, Wendy, from Joia
4 Food Farms have been wonderful. It's still very early on in
5 the mentorship, but knowing that I have someone I can just ask
6 questions of is very reassuring and gives me a great deal of
7 peace of mind. I'm really grateful to the program, and I'm
8 looking forward to everything else I can learn.

9 Then we want to share our experiences with others to
10 support their understanding of healthy food choices, smart
11 growing decisions, and anything that does not include dicamba.
12 So thank you for your time today, and inviting us to
13 participate in this.

14 HARRIET BEHAR (MENTOR), REAL ORGANIC PROJECT

15 MS. BEHAR: Okay. Hello, everyone. I think a lot of
16 you know who I am. I'm Harriet Behar. I have a farm near Gays
17 Mills, Wisconsin. We are incredibly diverse. Plus, I served
18 on this board.

19 I've been an organic advocate. I've been an organic
20 inspector since 1992. Some of you people weren't even born
21 yet, and I've been on thousands of organic farms. And my poor
22 husband, when we go on vacation, I, like, drag him to organic
23 farms wherever we are because I'm so interested in all of the
24 entrepreneurial activities that people do.

25 So, on my own farm, I grow vegetables and tree

1 fruits, and we have poultry. We grow a lot of our own cover
2 crop seeds, so we have a combine. And so when the TOPP
3 Mentoring Program came open, I thought, well, I have so much
4 experience, I would love to share it. And I love to help
5 people problem solve, and as an organic inspector, be a
6 resource of resources. So I approach mentoring as a way to be
7 a mirror to the person, and kind of question some of the things
8 that they might want to do.

9 I have a very enthusiastic mentee, and he's got big
10 plans. But the other thing, too, is I think it's really
11 important, rather than me just giving my opinion on something,
12 but to also provide information and help the mentee figure out
13 their own problem solving so they can be empowered in finding
14 their own answers. It has been really exciting working with
15 Nick and Betsy, and their goals of feeding their community and
16 educating their community about farming, and organic in
17 particular, is really a big bite to chew. But I have no doubts
18 that their enthusiasm will carry them through it, because any
19 of us who are farmers, we know we don't do it for the money.
20 We do it for love. And so they -- they're coming to their farm
21 dream with the right attitude.

22 NICK STAPLES (MENTEE), CELLANIE FARMS)

23 MR. STAPLE: Thank you, Harriet. Thank you to the
24 Board. My name's Nick Staple. As Harriet mentioned, we have a
25 farm in the Madison, Wisconsin area. We are brand new farmers,

1 and so it's quite an honor to be here with the luminaries of
2 the organic world. So thank you very much for inviting us.

3 Our farm plan includes a vertically integrated food
4 hub. We have acreage just outside of Madison, Wisconsin in
5 suburbia, and in fact, we acquired those acres just last year.
6 Staved off single-family development to bring a pocket of
7 stillness to suburbia, and offer an opportunity for younger
8 children, the ages of mine, five and six, to know what a carrot
9 actually looks like when it grows in the ground. That was one
10 of the eureka moments that we had, growing food in our garden
11 and having kids come over and say, wow, that's what a carrot
12 looks like. Or, you know, parents of those children say, my
13 kids only eat vegetables when they come from your house.

14 So that's what we're doing in Madison, Wisconsin. We
15 have big aspirations, as Harriet said. Farm, market, store
16 with aggregation celebration events, farm-to-table dinners.
17 We've been integrating ourselves with the local high school to
18 talk about youth apprenticeship programs and plan on offering
19 summer camps as well. The mission of Cellanie Farms is to
20 return people to the land from which their food is grown. And
21 because our acreage sits right next to suburbia, I think we
22 have a nice opportunity to do that.

23 We're not seasoned farmers, as you probably imagine.
24 I have a confession to make, and it's that I spent the last 20
25 years in pharmaceutical development and had actually done crop

1 residue testing studies for Syngenta. So I hope that this
2 group can appreciate that me admitting that is like confession
3 at the Vatican. So, thank you.

4 But we are nestled in suburbia, and we're very
5 excited to kind of bring that, you know, pocket of stillness
6 like we talked about to the local community. For farms like us
7 and farmers like us, which again is a new term, you know, we
8 don't have the generational transfer of knowledge that I think
9 was germane for a lot of people who grew up 30, 40, 50 years
10 ago.

11 Myself, I'm one generation removed from my
12 grandfather's dairy farming operation near Green Bay,
13 Wisconsin. And we lost those opportunities to pass along this
14 knowledge. And so, Harriet, you're incredibly important to us
15 as a friend and mentor because you are a link for us to that
16 way of farming. And we just really appreciate all of the help.

17 And Harriet has been great. I, you know, I think we
18 have a really nice back and forth. You know, she challenges me
19 in ways of thinking and not what to do, but maybe how to
20 approach a problem. And so that's been really helpful. So
21 thank you all.

22 MS. BEHAR: I just wanted to add too that I have
23 helped Nick navigate some various government programs as well.
24 And I think, Nick, that when you go into the NRCS office, the
25 next time to apply for 823, I'm going to go along with you.

1 MS. WALENT: Well, thank you to our mentor and
2 mentees, our -- my Midwest core partners. And thank you all
3 for really allowing me the privilege to do the work of a
4 lifetime. It's a great honor. So with that, I'd like to open
5 up for questions.

6 Q&A

7 CHAIR SMITH: Okay. I see Nate, and then Jerry, and
8 then Allison. And I'm just going to say, if you have
9 questions, Allison's going to, I think, field them. But also,
10 if you have questions for any of the other speakers, I think
11 the speakers are then -- are going to go to the podium to
12 answer the questions because there's a mic there. So if you
13 have, please say who you're going to ask your question so they
14 can get to the mic.

15 Okay, Nate.

16 MR. POWELL-PALM: Great presentations, and forgive me
17 now because I have three questions. So the first one is a
18 question for Nick. I imagine that your mentor is in the
19 greatest category, but can you verify that for the record for
20 me, please?

21 MR. STAPLE: 100 percent certified, yes.

22 MR. POWELL-PALM: Great, thank you, Nick, appreciate
23 it. I think maybe this is a question for Allison or anyone who
24 wants to respond.

25 Some of the work I've done in the Midwest around

1 incentivizing or growing grain production has focused on the
2 lack of processing and storage infrastructure for grain. Is
3 there any part of the mentorship/mentee program focused on
4 transitioning facilities to organic, or is that a phase two, or
5 is that something that's being kicked around in the
6 discussions?

7 MS. WALENT: That's a great question. Certainly,
8 access to markets and processing is a constraint to organic
9 grains entering the market here in the Midwest. The priority
10 of the program is for transitioning producers with a secondary
11 look at how do we support markets. Certainly, there are a
12 couple of awards that came through the organic market
13 development grant side of OTI that are geared towards
14 developing organic grain markets. And one of our core partners
15 is OFARM, which is a collection of cooperatives that are
16 supporting access to grain markets for our transitioning
17 producers.

18 MR. POWELL-PALM: That's really encouraging to hear.
19 And then my last question's for Kenya. I would love to hear
20 Farmer Evelyn's (sic) story if you don't mind taking a little
21 bit to share that. Thanks.

22 BOARD MEMBER JOHNSON: Can I add my question on TOPP
23 because it's also for Kenya and related? Kenya, thank you so
24 much. I'd also love to hear it. You mentioned that most
25 Kentucky black farmers are not participating. And if you could

1 speak to that more.

2 MS. ABRAHAM: Certainly. Evelinia -- Ms. Evelinia is
3 what I call her. She grew up as a sharecropper's daughter and
4 she's purchased a few different properties in Southeast --
5 South Central Kentucky, and has had many challenges with, you
6 know, NRCS and doing certain things, but does everything she
7 can to educate herself and organic practice is very important
8 to her.

9 However, building trust in this -- with this industry
10 is necessary. She trusts me. And so, therefore, she's, you
11 know, willing to cross the bridge.

12 Other Kentucky farmers, and I'm very well linked in
13 to the organizations that are, you know, BIPOC-centered in
14 Kentucky. I'm a farmer liaison and so I have constant contact
15 with, you know, most of them. I'm trying to gain the trust to
16 do partnerships even with the organizations that are black
17 farmer-led in Kentucky. They trust me. I'm a member of their
18 organization.

19 However, their relationships with not just the
20 organic industry, but the agriculture industry as a whole,
21 there needs to be some bridges and buildings to repair the --
22 when I say repair or restore, I'm talking about the condition
23 of the black farmer. You can ask me to join your program or be
24 a part of it, but I'm sitting here wearing a pair of flip-
25 flops, farming in them, and I've got hospital socks on

1 underneath them, you know, and I don't have my boots
2 necessarily.

3 And that's the condition of the black farmer in
4 America. Our boots have been taken from us, from the back of
5 our ancestor. And so I'll just say it, this USDA would not
6 exist without the back of the slave in America. You
7 wouldn't -- we wouldn't have what we have without that. And so
8 there has to be some restore and repair to the condition of
9 black farmers, which is outside of the parameters, obviously,
10 of this program. I'm not asking you all to step up and do
11 this.

12 However, you have to bring it. You have to care
13 about it. It's got to be important to you, to the USDA. I'd
14 love to say take me to your leaders, because that's really
15 what's necessary in order for what has to happen to restore the
16 condition of black farmers. And if that would happen, and it
17 would bring about then access to organic markets for black
18 farmers, it would bring a change in what we're calling food
19 deserts, which are really food apartheid in America.

20 And so it's a lot of work. It's just -- it's outside
21 of really what this program can even offer. However, that's
22 the lens that I can speak to, because that's what I want to
23 deal with. I hope I answered your question. Thank you.

24 CHAIR SMITH: Jerry, please go ahead.

25 MR. D'AMORE: This is a hello to Harriet. She won't

1 remember this, but you were the very first person that I called
2 to get my feet on the ground and get grounded when I joined the
3 board. And it was your even-keeled conversation that lasted a
4 good hour with not only wisdom, but an open mind that was
5 helpful for me getting started. So thank you.

6 MS. BEHAR: You're very welcome.

7 MR. D'AMORE: That's what you do, right?

8 MS. BEHAR: That's what I do. I -- I've always been
9 -- when I worked at MOSES, I spent a lot of time on the phone
10 talking to people and helping them really find their own way,
11 because I'm not going to be there the whole time. And also,
12 too, everyone has their own excellent perspective to bring to
13 the conversation.

14 MR. D'AMORE: Well, may you outlast me. I wish you
15 that.

16 MS. WALENT: Allison, please go ahead.

17 BOARD MEMBER JOHNSON: Yeah, thank you. This is fast
18 becoming my favorite part of these meetings, too. It's just so
19 inspiring to see how much has come together in such a short
20 time. And I was sitting here doing your math, Allison, like 44
21 events since January. That's two a week. And if you think
22 about the exponential growth of this, if this is happening in
23 six regions across the street -- across the country -- across
24 the street, for five years and potentially beyond, it -- it's
25 really exponential potential growth. And I'm thrilled to learn

1 about it in each region that we visit.

2 And one logistics question. I think Roz mentioned
3 the fact sheet. If you can send us that fact sheet, we would
4 love to see it about the applications for transition and
5 certification so far.

6 And then I'm curious to hear from Allison and anyone
7 else who might want to speak to it: how you're reaching
8 conventional farmers specifically. This is something that's
9 been brought up in the context of our transition proposal.
10 There's a lot of great work, I think, sort of pulling in people
11 who are almost there already. And I'm curious to hear
12 specifically how you're reaching those conventional producers
13 and sort of bringing about a systems transformation in the way
14 that they farm.

15 MS. WALENT: I'd invite any of my partners that would
16 like to come up to answer that, but I can take a stab while
17 you're on your way.

18 So, you know, the program rolled out very quickly.
19 Very quickly. We were really targeting to launch mentorship,
20 March, less than six months after we all came together and
21 signed our agreements with the National Organic Program. So
22 our focus is really on, initially, on how can we get some quick
23 wins and start gaining some momentum for the program. And we
24 have conversations on a regular basis on how we're going to go
25 outside of what our normal operating procedure is to reach

1 those conventional or traditional-minded farmers.

2 Some of that is going to shows and conferences that
3 are not our typical. So, of course, of those 44 events, we
4 were at Marbleseed and the Organic Grain Conference in
5 Illinois. But we also went to Pick Tennessee, which is a more
6 conventionally-minded conference.

7 So that's one way, but then our partner in -- where's
8 Brandon? OCIA is doing some advertising on behalf of all of
9 TOPP, through Acres (phonetic), which is a mixed organization.
10 So certainly, we don't have a clear communication formula for
11 that in this moment, but we acknowledge that we need to, and we
12 plan to, in the next phase of our program, to reach out to
13 those audiences.

14 MS. LEHMAN: So, in Iowa, we've used just a range of
15 different outreach and promotional techniques. So your
16 traditional, using your e-news, going to the conferences and
17 different events of our partners, and we do have a strong
18 agricultural network in Iowa. But it is looking outside, like
19 PFI, that's a great resource that we, those, what I would say,
20 farmers that are on the fence or organic-curious, those might
21 be the first folks that might be interested in reaching out to
22 us. But I think it's important to just be that space in the
23 state. In a lot, I can't speak for a lot of states, I guess,
24 but it's just like, where could folks turn 10 years ago? Who
25 could you pick up the phone and call? So just being there and

1 being able to answer those questions with the organic farm
2 advisor position is huge.

3 But even getting outside of agriculture, in a
4 previous life, I had worked for a ballot amendment issue, and
5 one of the things that we -- we wanted to increase funding for
6 natural resources. So we were talking to conservation groups.
7 We were talking to sportsman's groups, like Pheasants Forever,
8 Ducks Unlimited. These folks also have a vested interest in
9 what is being done on the land, in terms of what they're
10 interested in. But then we have rotary groups. Just how can
11 we touch different people in the community that also
12 understands or knows people that are farming, or cares about
13 where their food's coming from?

14 So for me, that's the next step in the work that
15 we're doing, is getting outside of the farming community and
16 just sharing about organic and what it is. And that way, when
17 they are talking to a farmer, they can share about the
18 resources that we're doing. So it's finding some non-
19 traditional networks to try to connect with.

20 CHAIR SMITH: Before you leave, I think my question
21 is for you. Thanks for this fact sheet. And we have heard a
22 lot through public comment that NRCS program is -- there's some
23 struggles and some challenges. And it sounds like from some of
24 the numbers that you shared, that at least in this region,
25 there's some progress being made. And so I just wondered if

1 you had any best practices or guidance that you could share
2 with us all that, I don't know, some learn, that they could,
3 you know, take from that and apply that in other parts of the
4 country.

5 MS. LEHMAN: Well, ideally, as you all know, it would
6 have been nice to have a good six months or a year to roll out
7 this program and have some training behind it. But one of the
8 things I mentioned in the fact sheet is, is we kind of just,
9 our office was just ready to roll it out. So we did not want
10 to not be a part of that. So it was making sure that we had
11 farmers, our board members involved.

12 So when farmers called us to say what's going on with
13 this, or I'm not, my office doesn't know about it, we had a
14 little bit of insight to what we could expect. And from there,
15 we were -- and there was a lot of pushback. So folks would be
16 sent away from the office and we would kind of serve as a
17 liaison. Let's work on this together so we can figure out --
18 that really helped educate the offices. They don't have that
19 organic knowledge and background.

20 So for us, we just jumped in with our feet first and
21 we kind of piloted it and we were seeing what worked and what
22 hasn't. And that has created our offices -- oh, their ears
23 opened to hearing about what's working and they have started to
24 modify some of the, I guess, requirements in our standard, not
25 huge, but it's just opening those lines of communication,

1 encouraging, promoting.

2 Folks didn't know about it. We talk about it all the
3 time. So I think that's really the result of that success.

4 CHAIR SMITH: Okay. Thank you so much. Dilip has a
5 question.

6 BOARD MEMBER NANDWANI: Thank you, Allison, for this
7 good presentation and all of your speakers. You know, the
8 easiest part of not only this TOPP program and also with
9 Climate Smart and RCS having participating in these two
10 programs. And also, thank you for a little bit clarifying why
11 Tennessee and Arkansas is part of Midwest, rather, I think,
12 conventionally or historically, they are part of Southern
13 region. So there has to be good reason and thank you for that.

14 So the quick question I have, kind of, and part of
15 that has been answered by your speakers too. This is on
16 mentor-mentorship program. Obviously, there are more mentees
17 rather than mentors. So let's say, I think, in other regions
18 too, other region and maybe other states, too. Like in
19 Tennessee, we have 45 mentees and maybe five mentors.

20 So how do you connect mentee and mentor? And can a
21 mentor have more than one mentee, like three, four, five,
22 maybe? And some challenges, I know some of the speakers, they
23 mentioned that challenges in, you know, this program, but do
24 you consider, like, how far they are located, the size of the
25 farm? Do you do virtually or in-person? Those kind of things,

1 if you can a little bit add into that. So as we are rolling
2 next year into this program, that will be helpful. Thank you.

3 MS. WALENT: Sure, so I'm going to tag on to
4 Allison's previous question and then answer yours, Dilip. I do
5 want to acknowledge, so states like Arkansas and Tennessee have
6 much less mentorship happening currently because of their
7 current state and knowledge of organic agriculture. So when
8 you talk about reaching conventional audiences, how are we
9 doing that? In Arkansas and Tennessee, we've taken this first
10 year as an education approach. How do we spend more time
11 educating NRCS staff, extension staff, farmers? How do we, you
12 know, entice them?

13 And, you know, Arkansas specifically has a serious
14 interest in organic agriculture in the Delta region and they
15 are threatened profoundly by dicamba drift. So this is a
16 challenge that we have in that region. So, and then in regards
17 to the rolling out of the mentorship program specifically, as I
18 said before, there are five main program areas and mentorship
19 was one of the programs that we received guidance from the NOP,
20 that they really wanted to see some consistency across the six
21 regions and how that was implemented. So the six regional
22 leads worked extensively on designing the rollout of that
23 program.

24 So yes, there is -- you know, we strive to have one-
25 to-one mentorship. We -- and there are a few nuances between

1 all of the regions, but we do try to keep the mentor and mentee
2 pair within a couple hours of each other. The goal is that
3 they would visit each other's farm at least once during their
4 mentorship period. There is a step up so that there could
5 be -- one mentor could mentor multiple mentees and there's also
6 a group mentorship model. So all of those are lined out
7 programmatically and then applied appropriately.

8 In the Midwest, you know, 11 states and we cover a
9 lot of geography and I've really leaned heavily on our core
10 partners to implement that. So we do have a monthly mentorship
11 subcommittee meeting that has talked about implementation and
12 over the last couple of months we haven't been meeting because
13 of all the events, but we will and support each other as we
14 roll out mentorship in Tennessee and Arkansas.

15 BOARD MEMBER NANDWANI: Thank you.

16 CHAIR SMITH: Amy, please go ahead.

17 VICE-CHAIR BRUCH: Yeah, thank you, Kyla. Thank you
18 for this wonderful insight to how the TOPP program's being
19 executed in the Midwest region. I just feel like it was a very
20 high-octane delivery because transition isn't easy and so this
21 was really inspiring.

22 I wanted to say thank you to Roz and the Iowa Organic
23 Association. I'm not a part of the Midwest region. I'm a part
24 of the Plains, but I did tap into some of the information you
25 guys were circulating for the OTI 823, so that really helped

1 farmers in the Plains region. So those best practices and
2 sharing between the regions, I want to highlight that that's a
3 real important feature of the TOPP programs.

4 Wanted to ask, when we look at the success that's
5 happening behind TOPP in these regions of recruiting new
6 producers in the transition, do we need to start thinking of
7 potentially a part two for retention of these new producers?
8 Kind of TOPP part two and looking more formally at markets and
9 crop insurance, et cetera? Do you think that would be
10 beneficial? Is that something we need to, as an organic
11 community, be thinking of in the queue?

12 MS. WALENT: Absolutely. I've been thinking a lot
13 about part two of TOPP, the last -- particularly the last few
14 weeks. Certainly, we have a lot of conversations within our
15 networks about, you know, we can provide mentorship to
16 transitioning producers. We can identify producers --
17 transitioning producers, but if we don't also focus on market
18 development and access to markets, we are, you know, really,
19 quite honestly, dead in the water.

20 And then the other thing that I'm thinking about
21 quite a bit, and we are only, what, 18 months into the program
22 of a five-year program. But I do think we need to start
23 thinking about what the transition at the end of the program
24 looks like. As we're bringing farmers, you know, we have
25 farmers that are coming in that are a year away from

1 certification and maybe some that are three and four years away
2 from certification, and so what does that cliff look like?

3 And in particular, as we think about racial equity
4 and inclusion, I think that we would really do ourselves a
5 disservice to not consider what the end of that program looks
6 like, and lead folks who have a history of, for all really very
7 good reasons, lack of trust with the USDA and the federal
8 government, and then to almost abandon at the end of the five
9 years is, to me, a huge threat to the success of TOPP.

10 So, yes, I do think we should be considering the
11 transition and a part two, and I also think that, you know,
12 really working together under OTI to develop markets and
13 support farmers is certainly necessary for the success of this
14 program.

15 CHAIR SMITH: Thank you. Okay, one more from
16 Allison.

17 MS. WALENT: Sorry, I can't resist. I know TOPP
18 funding doesn't allow you to come here and do advocacy, but no
19 one's stopping me. So just a plug that the farm bill is being
20 debated hotly right now. The potential to continue funding for
21 things like TOPP is on the table, so really encourage everyone
22 in the room to be showing up in Congress in addition to here.
23 Thank you.

24 CHAIR SMITH: Thank you so much, Allison and
25 everybody in the Midwest region. You guys are doing incredible

1 work out there, and it's really inspiring to hear.

2 Okay. This brings us to lunch. We are still running
3 a little behind. I'm going to shorten our lunch just a teensy,
4 teensy bit. Be back 2:15, and we will resume our programming
5 with public comment.

6 LUNCH BREAK

7 CHAIR SMITH: Okay. If everybody could please take
8 their seats, we're going to get started. Welcome back from
9 lunch. We are going to have the remainder of our day filled
10 with public comments. So this is new and it's exciting.

11 I would like to start with a few reminders, once the
12 slide goes up. No, I'm waiting for Andrew to put the slide up.
13 Okay. Just a reminder that there is a policy in the policies
14 and procedures manual about public comments. It is displayed
15 on the screen.

16 All speakers who will be recognized signed up during
17 the registration period. Persons must give their names and
18 affiliation for the record at the beginning of their public
19 comment. Proxy speakers are not permitted. Individuals
20 providing public comment shall refrain from making any personal
21 attacks or remarks that might malign the character of any
22 individual.

23 Members of the public are asked to define clearly and
24 succinctly the issues that they wish to present before the
25 Board. This will give board members a comprehensible

1 understanding of the speaker's concerns. I will call on
2 speakers in the order of the schedule and will announce the
3 next person or two so they can prepare. There is an on-deck
4 chair at the front of the room so you can make your way to that
5 on-deck chair.

6 Then you will come to the podium. There is a timer
7 on the podium alongside with -- along with the slide advancer
8 if you have slides. Please remember again to state your name
9 and affiliation and then we will start the timer.

10 When you are done, please stay at the podium for a
11 moment so I can see if there's any questions from the board.
12 And again, we're trying to manage board members in the room and
13 board members on Zoom, so we'll just pause for a moment.

14 Board members, raise your hand if you have your
15 actual hand, not your Zoom hand, and I'll keep a queue and
16 we'll call on you in order. Only NOSB members are allowed to
17 ask questions.

18 Our first speaker will be Rhodes Yepsen, followed by
19 Sal Pinkman and then Michael Kratzer. Rhodes?

20 PUBLIC COMMENTS

21 MR. YEPSEN: My name is Rhodes Yepsen, Executive
22 Director of BPI. My comments will be focused on the petition
23 for rulemaking that BPI filed with USDA last fall on
24 compostable products and compost manufacturing.

25 BPI is North America's leading authority on

1 compostable products, representing the producers of these
2 materials as well as those composting them. We've also
3 submitted a letter to USDA requesting legal clarification on
4 whether the National List can be used to approve compost
5 feedstocks or not.

6 Earth Day was last week and the 2024 theme was Planet
7 vs. Plastic with a focus on three things: reducing health
8 risks, demanding change, and pioneering innovative solutions.
9 Compostable products are a prime example of all three.

10 California is demanding change and has brought this
11 issue of innovative compostable solutions forward, passing laws
12 for mandatory statewide food scraps collection and laws
13 requiring all packaging to be reusable, recyclable, or
14 compostable. California has also mandated that compostable
15 packaging be an allowable input under the organic -- under the
16 requirements of the National Organic Program by 2026, around
17 the corner. This law is based on the discontent that
18 compostable products, including those used by the organic
19 industry itself, are causing finished compost to be disallowed
20 from use in organic agriculture, causing problems for the
21 entire composting system, as you heard on the webinars from
22 cities like San Francisco.

23 Look to organic brands, organic co-ops, farmers
24 markets all around the U.S. to see that the organic community
25 has been an early adopter of compostable products, choosing

1 these items to move away from single-use items. The disconnect
2 is coming to a crossroads where these organic markets and
3 brands will soon lose the option to package and serve their
4 food with compostable products in California. Even simple
5 things like a compostable fruit sticker or food scrap
6 collection bag will be disallowed in 2026 if we don't act.

7 Make no mistake that the climate emergency is in part
8 being created by our consumption habits around food and
9 packaging. Recent satellite imagery shows that landfill
10 methane emissions are far worse than reported, with many
11 landfills meeting the super-emitter threshold set by EPA for
12 the oil and gas sector. Last week, the U.N. negotiations for a
13 global plastics treaty met in Canada for INC-4 to stop the
14 proliferation of conventional plastics.

15 The ASTM standards for compostability are well-
16 established and rigorous, with built-in mechanisms for
17 continual improvement. We appreciate the NOSB creating the
18 space for discussion around composting at this meeting, and we
19 encourage the USDA to start the rulemaking exercise this spring
20 to ensure that the regulations on compost production are
21 updated to be clear and sound, aligned with our collective
22 goals of reducing waste and identifying climate-smart
23 solutions. There is no time to wait.

24 CHAIR SMITH: Questions from the board? Oh, sorry.

25 Oh, I see Allison.

1 BOARD MEMBER JOHNSON: Thanks for your comments.
2 I've been trying to piece together all of the moving parts of
3 this puzzle, and I've been having trouble tracking down the
4 requirement that California compost be organic-compliant
5 starting in 2026. Do you have a site that you could pass along
6 to us, or is it in your written comments?

7 MR. YEPSEN: Yeah, so the requirement is in the
8 definition of the plastics-labeling bill that requires a
9 compostable product to not only meet the ASTM standards, but be
10 associated with food scraps and other materials composters
11 accept, not have PFOS in it, and then be an allowable input to
12 organic agriculture.

13 BOARD MEMBER JOHNSON: Do you know the year or the
14 number of the bill?

15 MR. YEPSEN: AB 1201, and it was a few years ago.

16 BOARD MEMBER JOHNSON: Thank you.

17 CHAIR SMITH: Amy, please go ahead.

18 VICE-CHAIR BRUCH: Yeah, thank you, Kyla.

19 Rhodes, thank you for joining us today in person and
20 for your comments regarding compost. I have a couple
21 definition clarifications for you, because I think the devil's
22 in the details here with definitions, and I just want to make
23 sure I'm on the same page later on when we're hearing our
24 compost panel and then also deliberating.

25 So, one is, is there any distinguishing factors,

1 visually, between a certified compostable product and a -- just
2 a compostable product?

3 MR. YEPSEN: It's a great question and one that is
4 very key to our organization. So we require items to be
5 labeled in order to get our certifications. It was a part of a
6 three-year rollout where we required items to be marked in some
7 shape or form so that they can be distinguished. Several
8 states around the U.S. have also passed laws specifically on
9 compostable packaging, requiring them to be labeled. So what
10 we are seeing is more and more labeling specifically of
11 compostable products, even when the conventional counterparts
12 are unlabeled.

13 So yes, there's no federal standard today requiring
14 labeling, but five states now have labeling laws, including
15 California, Washington, Colorado, Minnesota, and Maryland. And
16 then BPI as the leading certifier, we built it into our
17 requirements. So, starting January of this year, we actually
18 kicked products out of our certification program for non-
19 compliance for labeling.

20 VICE-CHAIR BRUCH: In what form would a label be put
21 on a product? Can you elaborate on that?

22 MR. YEPSEN: Sure, yeah. We -- it can be many, yes.
23 Nate Lewis is holding one up. So a coffee cup typically would
24 be printed. So printing is one mechanism. Embossing or
25 etching, so some type of physical mark is another. Those are

1 probably the two most common. But you could also use a sticker
2 that would have to be certified compostable to identify the
3 item. We are also seeing some other innovative mechanisms, you
4 know, with stamps and things like that. And we did some work
5 with the closed-loop partners two years ago, identifying
6 different labeling techniques and really how you make something
7 readily and easily identifiable to the consumer. And you need
8 several things to make it identifiable, so not just the word
9 compostable, not just a third-party certification mark like
10 ours, but also some type of coloring is what they found in the
11 consumer test.

12 VICE-CHAIR BRUCH: Thank you. I have another
13 question about just definitions and understanding, being on the
14 same terms with words. The certification process for
15 compostable, I was reading, it sounds like you're looking at
16 PFOS if it's intentionally added. Is that correct? That's
17 what's getting measured, is intentionally added PFOS?

18 MR. YEPSEN: Correct, yes. So we co-developed that
19 rule with groups like San Francisco Department of Environment
20 back in 2016, looking at how do we kick PFOS out. This was
21 ahead of any regulation, even at a city level, that we're aware
22 of. And the best mechanism that we could identify at that time
23 was the intentional use. So that's done through a chemical
24 screening of every ingredient, no matter how small, as well as
25 a statement from the manufacturer, because sometimes it's not

1 an ingredient, it's something in the manufacturing process,
2 like a spray that you put on the equipment. And then there's
3 also a total organic fluorine test to try to catch things and
4 make sure that we're keeping things honest.

5 VICE-CHAIR BRUCH: Okay. Is there a chance for
6 unintentional PFOS to be not captured --

7 MR. YEPSEN: Yeah, the reason for that --

8 VICE-CHAIR BRUCH: -- in certification?

9 MR. YEPSEN: -- language is something, if you think
10 about recycled paper content, where it may be getting in
11 through that. So again, we're -- we have criteria for recycled
12 paper and tests that those fibers have to go through. So they
13 wouldn't be allowed to intentionally use it, but it could be
14 coming through in that recycling stream.

15 Or water, so, you know, production sites that use
16 water, and if you have groundwater that has PFOS in it, which
17 pretty much it all does, you know, how do you not use water?
18 So what we were trying to focus on is the limit for what's
19 actually ending up in the product, and did you intentionally
20 use it or not?

21 VICE-CHAIR BRUCH: Okay. Thank you, Rhodes,
22 appreciate that.

23 CHAIR SMITH: Mindee, please go ahead.

24 BOARD MEMBER JEFFERY: Thank you so much, Rhodes. As
25 a retailer, I've spent a lot of time in the stores being pretty

1 excited about developments in sustainable packaging, and at
2 Good Earth, we have many different kinds, and I appreciate the
3 work you guys are doing. I see us organically and as retailers
4 and as compostable package industries as adjacent industries,
5 and we're all really important in our partnerships. And so,
6 and then I step into my role as an NOSB person, and my role is
7 to, as a subcommittee, provide information for the public to
8 give us information, and so that we can collect as much
9 expertise as we can find in this discovery phase of the
10 process. And so this is where we get to look at everything.
11 So, thank you for coming to our meeting and for your efforts.

12 And I'm struggling with the ASTM standard, and I'm
13 hoping you can provide me with some clarity, in the interest of
14 collaboration. So if I read it correctly, and please help me
15 if I don't, the ASTM standards, I think one of them, sometimes
16 it's a 90 to 100-day cycle, and another one is a 180-day cycle,
17 depending on the material. And is that accurate?

18 MR. YEPSEN: Yeah, so there are multiple tests --

19 BOARD MEMBER JEFFERY: Yes.

20 MR. YEPSEN: -- in the standard, and you have to meet
21 all of them, and they're kind of tiered from like when you're a
22 raw material to being converted or to a finished package. So,
23 yes.

24 BOARD MEMBER JEFFERY: So is 180 days accurate?

25 MR. YEPSEN: The 180 days is for one specific test

1 for a raw material. Yes.

2 BOARD MEMBER JEFFERY: Okay. And so is it some of
3 them are 90, and some of them can be up to 180?

4 MR. YEPSEN: Correct, yeah, maximum timeframes.

5 BOARD MEMBER JEFFERY: So my question here is that
6 because the certifier is reflected to us, a certifier reflected
7 to us in public comments that they would be expected to verify
8 that the process of the composter was able to show that that
9 actually occurred. Could you then understand if the Board had
10 to -- if we could include compostable packaging --

11 MR. YEPSEN: Yes.

12 BOARD MEMBER JEFFERY: -- and we found that route,
13 then would we also need to require that composters who took in
14 compostable packaging used a 90 to 180-day cycle to finish
15 compost?

16 MR. YEPSEN: It's a great question, and I appreciate,
17 you know, the sentiments about partnership and, you know,
18 adjacent industries, and we feel the same way. And so, no, the
19 tests in the ASTM standards and that are used by ISO and all
20 around the world are these tiered tests, right? So that you
21 have products, by the time it gets to a finished package, it's
22 been tested and retested multiple times.

23 So that 180 days is in isolation in a laboratory to
24 be able to tell whether an individual material on its own,
25 which is the requirement, it can't be part of the finished

1 item, can be fully consumed by the microorganisms. If you had
2 other active feedstocks in there, you wouldn't know whether
3 you're getting a result from the active feedstocks like food
4 scraps, or from the material itself. So the biodegradation and
5 disintegration happen much more rapidly in a full-scale
6 facility, as we have seen in a lot of field studies that have
7 been published recently.

8 It's just very challenging to be able to test that in
9 an open environment because of the number of variables. So, I
10 think that if there were concerns from the NOSB about what
11 remains in the finished compost, just like for anything else,
12 you would -- you could have a test on that finished compost.
13 Because what we're finding is the materials, you know, do not
14 remain as long as you go through a sufficient composting
15 process. So I know there were a lot of comments written and
16 through the webinars around microplastics, and I would say we
17 analyze every microplastic study we find. And the
18 microplastics, when you're finding a compostable microplastic,
19 it's in a partial stage of biodegradation in a process that
20 typically is really short and has not produced the finished
21 stable compost.

22 And so I think that would be a really good example of
23 how the compost process is really important if you're looking
24 at the stability, maturity of that material, and the quality,
25 and whether it's suitable for organic agriculture.

1 CHAIR SMITH: Allison, please go ahead.

2 BOARD MEMBER JOHNSON: Thank you. You can tell all
3 of our wheels are spinning up here. I appreciate you fielding
4 all these questions.

5 We had a little bit of information in the comments
6 last week around the PFOS threshold specifically. So this is
7 kind of following up on Amy's question. My understanding is
8 that BPI threshold is 100 parts per million, which sounds like
9 when you established the standards in 2016 was, by my
10 understanding, like the lowest that you could test for. We're
11 eight years into the future from then, and my understanding is
12 now you can test down to like 10 parts per million. So I'm
13 curious if it's feasible for you at this point to consider
14 dropping that standard as we continue to improve the technology
15 for detecting PFOS.

16 MR. YEPSEN: Yeah. So the ASTM standards and BPI
17 certification are in a process of continual improvement all the
18 time. So we are definitely open to looking at that and what
19 the labs have as a threshold, and then what causes a false
20 result, you know, again, being triggered. I think one of the
21 interesting things about the composting industry, right, is
22 there are passive receivers of materials. And I think that
23 we're trying to protect the composter as much as possible. So
24 if we can improve how strict our standard is and not have
25 things fail, everything fail, because of how much PFOS is in

1 the environment broadly, then we're open to, you know, doing
2 round-robin tests and figuring out what that new threshold
3 could be.

4 So yeah, I know that Denmark moved to 10 parts per
5 million. You know, the 100 parts per million was helped,
6 corroborated by University of Notre Dame and a lot of tests
7 that they were doing, again, kind of looking at that
8 intentional use level. And when it dropped below that, you
9 started getting a lot more variability in the results.

10 CHAIR SMITH: Amy, please go ahead.

11 VICE-CHAIR BRUCH: Rhodes, thank you for your
12 willingness to entertain all our questions. You mentioned you
13 reviewed some of the written comments and studies that are out
14 there. I did have a written comment that I wanted to review
15 with you and see what your viewpoint is. It's -- this is a
16 quote. It says, "The BPI certification says nothing about
17 potential toxicity of a product, only its capacity to
18 biodegrade." So I was just wondering what your thoughts were
19 on that. Thank you.

20 MR. YEPSEN: Sure. Yeah, it's -- that's not true.
21 So within the ASTM standards, they have plant toxicity tests,
22 which are OECD tests, you know, used internationally around
23 plant germination and biomass. And then, yes, the PFOS
24 restriction. We have a lot of other restrictions in our
25 criteria around persistent biological toxins and carcinogens

1 and mutagens. And then heavy metals tests that are set at 50
2 percent of the level that compost is held to, with the idea,
3 again, of not being a significant contributor.

4 The U.S. standards for heavy metals for compost are
5 actually quite liberal. So we certify for Canada as well,
6 which has much stricter heavy metals requirements. And we've,
7 again, been very proactive. A few years ago, we went to ASTM
8 voluntarily and asked them to meet the strictest in North
9 America, which is the province of Ontario, for their AA
10 compost. And all of our products have to be at 50 percent of
11 that level for heavy metals.

12 So there are a variety of tests. We're always,
13 again, happy to hear what other criteria the compost is being
14 held to. That's been really the benchmark, is making sure that
15 our products are meeting the same types of criteria that
16 compost has to meet.

17 CHAIR SMITH: Wood?

18 BOARD MEMBER TURNER: Sure.

19 CHAIR SMITH: Sorry. Wood, please go ahead.

20 BOARD MEMBER TURNER: Thanks, Rhodes. Let's see.

21 I'm trying to make sure I'm asking something a little different
22 than what everybody else is asking.

23 Let's see. You know, it's hard for me to separate
24 compostable plastic from kind of our single-use plastic kind
25 of, you know, disease in this country. And so, when I think

1 about what's created compostable plastic, I think about,
2 frankly, a poor labeling process that began -- that started in
3 the petrochemical plastic industry 30-plus years ago. And so
4 when I think about something that has to rely on certification
5 and labeling to be able to figure out what's going into the
6 system, it raises -- it concerns me. Because I think that's
7 been a -- I think the labeling system that was implemented by
8 the plastics industry was a failure, a terrible failure. And
9 so I'm just curious. I don't want to risk organic for
10 potential failure here as well.

11 MR. YEPSEN: Yeah.

12 BOARD MEMBER TURNER: So I'm curious about your
13 reaction there.

14 MR. YEPSEN: Well, are you talking about the Chasing
15 Arrows for --

16 BOARD MEMBER TURNER: Yeah.

17 MR. YEPSEN: Well, so I would say our program is more
18 akin to the USDA organic certification than it is to the
19 Chasing Arrows, right? So the Chasing Arrows is not a
20 certification program. It has a lot of problems that are
21 getting overhauled in many places. You know, it's purely a
22 voluntary or, you know, a self-identified resin code
23 identifying what plastic material it is.

24 In terms of a certification for compostability, it's
25 very different, right? There are a lot of tests and criteria

1 you have to meet. Labeling the item is to solve the problems
2 through the lack of labeling, because that's not really a
3 label. It was never really intended to be a consumer-focused
4 thing, you know, is the story. So I don't think that that's --
5 it's -- you can compare the two. I think what we're working on
6 is really about tests and certifications that products need to
7 meet and labeling to make sure that consumers know what to do
8 with an item to properly sort and dispose of it. So I see them
9 as pretty fundamentally different.

10 CHAIR SMITH: Got a couple more. Bear with us.
11 Brian, please go ahead.

12 BOARD MEMBER CALDWELL: Thanks, Rhodes. Back to this
13 100 parts per million threshold for PFOS. I haven't read all
14 that, but what is that specifically for? Is it a finished
15 product or is it inputs? What is held to that 100 parts per
16 million?

17 MR. YEPSEN: Yeah, the finished package has to --
18 it's 100 parts per million, total organic fluorine. So again,
19 that gets into the weeds here. It's not a PFOS-specific test.
20 It picks up a lot of other things with, again, the idea being
21 that that test is very readily available.

22 And we're -- we were concerned about just the number
23 of PFOS chemicals out there and the screenings sometimes are
24 very specific. And so that casts a really wide net.

25 BOARD MEMBER CALDWELL: Yeah.

1 MR. YEPSEN: Yeah.

2 BOARD MEMBER CALDWELL: So that's for total organic
3 fluorine?

4 MR. YEPSEN: Yes.

5 BOARD MEMBER CALDWELL: Okay. Those -- that range,
6 can you recall what the recent, I believe it was EPA drinking
7 water threshold is?

8 MR. YEPSEN: Yeah. Yeah, it's in the parts per
9 trillion --

10 BOARD MEMBER CALDWELL: Yes, it is.

11 MR. YEPSEN: -- for PFOS molecules.

12 BOARD MEMBER CALDWELL: So we're talking that
13 threshold is perhaps a million times higher than the drinking
14 water.

15 MR. YEPSEN: Totally, yeah.

16 BOARD MEMBER CALDWELL: Okay.

17 MR. YEPSEN: Yeah, I mean, I would just say, I mean,
18 we have more than that in our blood, right? In our bodies
19 before we're born. We're on the side of getting --

20 BOARD MEMBER CALDWELL: Not more than 100 parts per
21 million.

22 MR. YEPSEN: What's that?

23 BOARD MEMBER CALDWELL: Not more than 100 parts per
24 million.

25 MR. YEPSEN: No, in the parts per trillion.

1 BOARD MEMBER CALDWELL: Yes.

2 MR. YEPSEN: And so what we're trying to get at are
3 reasonable test criteria. We're on the side of eliminating
4 PFOS from single-use items. And I think you'll be hard-pressed
5 to find other organizations who've done more in packaging to
6 get rid of PFOS than BPI. So we're on that side. We're all
7 for figuring out better, improved test methods. They just have
8 to work for us certifiers. As you all know, with your
9 certification program, it gets challenging when you set rules
10 in place. So we're open to hearing how we can improve those
11 criteria.

12 We don't allow any use. So if something shows up in
13 a part per trillion in a formula, it's banned in our -- from
14 our program.

15 BOARD MEMBER CALDWELL: Great. Thank you very much.

16 CHAIR SMITH: Yeah. Nate, please go ahead.

17 BOARD MEMBER POWELL-PALM: Can you describe how BPI
18 does kind of enforcement of your label? What happens if I
19 decide my thing's compostable and put BPI on it? Or is it a
20 trademark logo? How does that kind of the -- the full loop of
21 the scheme work? Thanks.

22 MR. YEPSEN: Yeah. Good question. It is
23 trademarked. So we have a fair amount of authority for
24 enforcing when somebody misuses our mark. Unlike with organic,
25 the word compostable is not covered under a federal regulation.

1 Some states have passed these laws, those five that I mentioned
2 around the use of the word compostable that are linking it to
3 ASTM standards and requiring certification.

4 So, yeah, we have -- we take all complaints, monitor
5 the marketplace for misuse of the BPI mark, and pursue it to
6 our fullest ability to get people to either enroll in the
7 program if it truly was compostable and they just messed
8 something up to, you know, help them fix that problem or, you
9 know, pursue legal action to get them to remove the mark.

10 CHAIR SMITH: Thank you so much for being with us
11 today, Rhodes. Appreciate your commentary.

12 MR. YEPSEN: Yes. Thank you.

13 CHAIR SMITH: Up next is Sal Pinkham, then Michael
14 Crotser, and then Gwendolyn Wyard.

15 Sal, don't forget to state your name and affiliation.

16 MS. PINKHAM: Good afternoon. I'm Sal Pinkham,
17 Certification Program Manager at OFA. We certify 1,100 organic
18 farmers and food processors in the 12-state region. I
19 appreciate the opportunity to comment today on behalf of our
20 certification program and our farmers.

21 To increase access to NOSB meetings, we ask NOSB to
22 publish meeting materials and technical reports as early as
23 possible ahead of each NOSB meeting, to make both audiovisual
24 and transcript recordings available to the public, and to
25 institutionalize farmer listening sessions entered into the

1 public record, outside of the spring and fall comment periods.
2 Thank you for continuing to bring attention to the need for
3 accessible and useful crop insurance for organic and
4 transitioning farmers. We've been pleased to see meaningful
5 efforts from RMA, such as the searchable database of agents
6 familiar with relevant policy types.

7 However, the transitional production plan needs
8 greater finesse. The open-ended questions in the TPP may be
9 harder to fill out for farmers not already steeped in organic
10 terminology and practices than the checkboxes and specific
11 prompts that certifiers like OFA have added to our OSPs.
12 Farmers who reviewed it said they would rather fill out the
13 certifier OSP.

14 OFA farmers continue to state the importance of soil
15 in organic crop production. We again urge the board to call
16 for a moratorium on the certification of new hydroponic and
17 aeroponic operations that grow crops to maturity in containers
18 inconsistent with crop production standards and to add field
19 and greenhouse container production back to your work agenda.

20 Regarding three materials topics. First, we
21 wholeheartedly support the proposed revisions to the technical
22 report templates. These revisions bring the process for
23 reviewing substances into better alignment with the National
24 List criteria and they keep up with the changing face of
25 organic production.

1 Second, OFA requires review of all synthetic
2 substances used in organic production. The presence of
3 endocrine disruptors and carcinogens in organic-allowed
4 pesticides presents a moral and economic hazard to all organic
5 operations. NOC proposes a workable, that's the National
6 Organic Coalition, proposes a workable and justified framework
7 to prioritize and review the synthetic inert substances
8 currently used in allowed pesticides.

9 Third, we fully support broadening the net for
10 residue testing to better encompass the entire global organic
11 supply chain and we welcome guidance on how to use it most
12 effectively. We suggest that NOP aggregate positive test
13 results from certifiers and share that data with us so that we
14 can continually adjust our sampling efforts to focus on areas
15 of highest risk. However, we caution against over-reliance on
16 this expensive tool beyond 5 percent of operations annually.
17 Like MOFGA, we are a non-profit and most of our certified
18 operations are small farms. Increasing the cost of providing
19 certification services risks pricing more of them out of
20 certification.

21 Finally, we note the importance of NOP impartiality
22 among certifiers. We do not support the proposal for NOP to
23 refer operations to individual certifiers. NOP should instead
24 direct operations to the Organic Integrity Database certifier
25 search.

1 Thank you all for your service to the organic
2 community and for taking the time to listen to my comments.

3 CHAIR SMITH: Thanks so much, Sal. You have a
4 question from Nate.

5 BOARD MEMBER POWELL-PALM: Thanks for your comments,
6 Sal. Could you say a little bit more about what type of
7 farmers you tried out the transition plan with? Were they
8 transitioning farmers? Were they already existing organic
9 farmers?

10 MS. PINKHAM: A mix of the two. We have a working
11 group as part of our policy program, not our certification
12 program, comprised of OFA members broadly and it includes both
13 currently certified and transitioning farmers and a couple who
14 are considering transition.

15 BOARD MEMBER POWELL-PALM: Okay. Thank you.

16 CHAIR SMITH: Thanks so much, Sal. Appreciate it.

17 MS. PINKHAM: Thank you, all.

18 CHAIR SMITH: Up next, we have Michael Crotser
19 followed by Gwendolyn Wyard and then David Will.

20 MR. CROTSEY: Thank you. Let me try again. I'm Mike
21 Crotser, the certification director at Cropp Cooperative. We
22 appreciate the work of the NOSB and the NOP to support organic
23 agriculture.

24 I want to welcome the NOSB, the NOP, and industry
25 partners to Wisconsin, a state of incredible natural resources.

1 It is an opportunity to talk about how our natural resources
2 set us apart from any other state. What are those resources?
3 Well, you must be from out of state. For all of us here know,
4 they are beer, cheese and the Green Bay Packers.

5 I want to discuss generating organic certificates
6 through OID. The purpose of 20 -- 205-204 was to ensure
7 certificates have consistent information and formatting. SOE
8 requires that certifiers maintain certificates through OID with
9 the goal of improving transparency and accessibility. Hearing
10 this, we were excited.

11 However, we are seeing inconsistencies in OID-
12 generated certificates and operation profiles. One concern is
13 some OID certificates will have an issue date that is the same
14 date as when the certificate is generated. For example, if I
15 generated a certificate today, it would have an issue date of
16 April 29, 2024, whereas if I generated the same certificate
17 last Tuesday, it would have an issue date of April 23, 2024.
18 We hear that this is being corrected so that the issue date
19 will only change when certificates are updated, post-
20 inspection, when products are added or removed.

21 We are seeing either the mailing address or the
22 physical address listed on OID certificates. Identifying the
23 physical address would be better. The mailing address, like
24 PO, may not indicate where production is occurring or where the
25 central office is.

1 We are also seeing certifiers take a parallel path
2 and issue separate product addendums that must be obtained from
3 certifiers. This is helpful by allowing certifiers to show
4 production locations, but addendums are harder to obtain. We
5 see two concerns as a certified operation. One, it does not
6 appear that OID certificates are meeting the goals of improved
7 transparency or availability. And two, operations don't know
8 what they need for compliance.

9 We don't have any perspective on technology
10 limitations, but we believe these limitations are creating
11 inconsistencies among certifiers. We acknowledge that SOE
12 increased the workload of certifiers and time is needed to
13 resolve. Our point is that a wider discussion is needed about
14 how information is presented in OID, the documents an operation
15 must maintain, the role of addendums to augment operational
16 profiles, and how the NOP can facilitate consistencies.

17 Thanks for the time to speak today, and I'm happy to
18 answer any questions on OID certificates or any other public
19 comments CROPP has made. Thank you.

20 CHAIR SMITH: Thanks so much, Mike. I think you're
21 free to go. Appreciate your comments.

22 MR. CROTSEY: Thank you.

23 CHAIR SMITH: Oh, shoot. Wait. Sorry. Nate's
24 supposed to be keeping an eye on Amy and Logan's hand.

25 Amy, please go ahead.

1 BOARD MEMBER POWELL-PALM: It's the Secretary's
2 fault. Yeah.

3 VICE-CHAIR BRUCH: No problem. That's okay. Thank
4 you, Mike, for joining us today and your comments. I
5 appreciate it. Had a question for these addendums. You
6 mentioned them in your comments just a second ago. How do you
7 know if an addendum is available for an operation?

8 MR. CROTSEY: That's a great question. Usually, we
9 have a hunch that information that we're not seeing on an
10 operational -- on an operation profile, something's missing,
11 right? And then we start looking at an addendum.

12 For us in our business, you know, branded items would
13 be a good indicator of that, especially private labels, right?
14 If we get an operation profile off the OID and it's not showing
15 private labels that our business manages, we just know that
16 that's incomplete information. And so perhaps -- and this is
17 probably a longer answer that you wanted, is, of course, an
18 operation profile should not list a bunch of private labels
19 because that kind of blows the cover of the purpose of having a
20 private label. But in generally (sic), if we're looking at
21 agricultural commodities like corn in our feed program, an
22 operational profile probably would be enough.

23 That's just our general hunch on this. We've had
24 conversations with our certifier, OTCO, what's appropriate to
25 have on file, what's not. We're kind of gaining ground there.

1 But I will say that as a business, we've got good experience
2 with this. We have 1,700 farms, 100 co-packers. So we have a
3 lot more experience than other people in the supply chain. So
4 if we're struggling to understand what we need for our OSP, I'm
5 sure there's a lot of other people in the industry.

6 VICE-CHAIR BRUCH: Thank you for shedding some more
7 light on that. Appreciate it.

8 CHAIR SMITH: Jerry, please go ahead.

9 BOARD MEMBER D'AMORE: Thanks. I didn't fall asleep
10 at the wheel here, but you went right by private label and the
11 purpose of private label, and I didn't catch the reference.
12 What do you mean by blowing the cover and the purpose of a
13 private label?

14 MR. CROTSER: I mean, it's kind of difficult to talk
15 about as a business and give more examples. But generally,
16 milk marketers, co-packers in the industry, will produce for
17 private label, store brands. And generally, that's an
18 agreement between a particular business like ours or a co-
19 packer to bring those private labels to market. And generally,
20 compliance for those private labels are rolled into the
21 certified business's organic system plan.

22 Generally, everyone knows who's doing everyone else's
23 private labels. But generally, that historically has not been
24 information that's been provided on organic certificates.
25 Usually, a certifier will list what's called a private label

1 certificate. So if you look at Cropp's certificate on the
2 Organic Integrity Database, or even what you could get from
3 OTCO, you'll see our branded stuff on there: Organic Valley,
4 Organic Prairie, Mighty Organic, all those brands. But you
5 won't see listed in any of the private labels we do. And
6 that's primarily for proprietary reasons.

7 BOARD MEMBER D'AMORE: Thank you.

8 MR. CROTSEY: Yeah, thank you.

9 CHAIR SMITH: Okay. Thanks, Mike.

10 Up next, we have Gwendolyn Wyard, then David Will,
11 and then Bill Wolf.

12 MS. WYARD: Okay. Well, hello, NOSB members, NOP
13 staff, everyone in the gallery. My name is Gwendolyn Wyard and
14 I am a founding partner of Strengthening Organic Systems. We
15 are a new advising firm on the block and our mission is to
16 assure the authenticity of organic products, help businesses
17 prevent organic fraud, and maintain consumer confidence in the
18 USDA organic seal.

19 Today, I'm going to touch on two topics. And if
20 there's time, I'm going to tell a knock-knock joke. Sorry,
21 Steve. This one's spelled N-O-C-K, not N-O-C.

22 So first up, pullulan, pronounced pullulan. Yes, to
23 answer the first question, it can be produced organically. And
24 NOP-certified organic forms are available. You can find
25 several listings of pullulan in the Organic Integrity Database,

1 both the raw material, which is the primary ingredient for the
2 organic empty pullulan capsule. So there's two products.

3 Most of the production is international, coming from
4 China. However, a recent expiration of a patent restriction
5 has opened the door for, finally, sales in the United States.
6 And we finally have one domestic producer of organic pullulan,
7 the raw material, and the organic pullulan capsules. This
8 Oregon-based company has the capacity to make 500 metric tons
9 of the pullulan and 2 billion organic capsules. And I am in
10 touch with them and will be continuing to work with them.
11 However, the current demand for their product is less than 30
12 percent of what their capacity is. So just some stats there to
13 work with.

14 On commercial availability, it's important to
15 understand that the National List Allowance is for the made-
16 with category, for made-with supplements, a category that
17 commercial availability does not apply to. Also, if a company
18 wants to use the USDA organic seal on an encapsulated
19 supplement, they must use the certified organic capsule because
20 the weight of the non-organic capsule will not allow for that
21 95 percent compositions. They must use that certified organic
22 version.

23 I believe that most companies want to use organic
24 pullulan because they want to use the USDA organic seal. But
25 we're not quite there yet for a host of reasons and a long

1 history that I'm happy to expand upon.

2 TR templates, moving on to my second topic. The
3 proposed TR revisions around excluded methods. Thank you for
4 your work on this. I believe the information collected may
5 support a more accurate and a more efficient compliance review.
6 The issue where the rubber hits the road is what to do with
7 that information and how it's effectively utilized by
8 certifiers and MROs in their day-to-day decisionmaking, product
9 by product. I'm going to venture to say that in order to
10 achieve the goal, if I'm understanding the goal, improved
11 material review policy, improved oversight and consistency will
12 need to be coupled with that information that you gain through
13 the technical review.

14 In closing, I'd like to pass the baton in style to
15 our next speaker, David Will, by sharing a nock-nock joke,
16 again spelled N-O-C-K. Madam Chair, if you would be most
17 gracious and ask me the question, nock-nock.

18 CHAIR SMITH: Who's there?

19 MS. WYARD: Methionine.

20 CHAIR SMITH: Methionine who?

21 MS. WYARD: Well, keep it on the DL, but I'm amino
22 acid and I'm essential as L.

23 CHAIR SMITH: Thank you. Questions for Gwendolyn?
24 Dilip, please go ahead.

25 BOARD MEMBER NANDWANI: I told you I'm not going to

1 ask questions, but it's just that hearing after your, you know,
2 analysis, I thought I'll just quickly have some sort of quick
3 clarification, not a big question.

4 And the big thing -- Gwendolyn, thanks for correcting
5 the pronunciation. It is pullulan, right?

6 MS. WYARD: Pullulan, like pool.

7 BOARD MEMBER NANDWANI: So, the analysis of pullulan
8 is an agricultural or non-agricultural substance according to
9 the definition. Is it now conclusive that it is non-
10 agricultural or non-synthetic?

11 MS. WYARD: It's conclusive that it's non-synthetic,
12 non-agricultural, and that's a big part of the history is that
13 for many years, it was being allowed in the made-with category
14 as an agricultural ingredient. Then, when the classification
15 of materials came out in 2016, I believe it was, so that's
16 5033. Once certifiers started running the pullulan through
17 that decision tree, it came out as non-agricultural.

18 And so you can look in the petition and you can look
19 in previous documents and it goes -- it will walk you through
20 the steps. I won't go through that all here and put everyone
21 to sleep. But that is what prompted the petition then that was
22 submitted in 2018 by the Organic Trade Association was to get
23 pullulan onto the National List so that it could continue to be
24 allowed in made-with encapsulated supplements in that 30
25 percent as an allowed non-agricultural ingredient.

1 Otherwise, I think we were looking at the time, it
2 was something like \$825 million of made-with capsules were
3 going to be out the door and not allowed. And so that was
4 relatively recent. 2019, I believe, is when it went on the
5 National List.

6 And then there was also this patent that was
7 restricting sales in the United States. And that patent just
8 expired. So yes, there is organic pullulan, but it's really
9 new to the market and everybody is adjusting and now looking at
10 reformulating and using that organic pullulan in their
11 capsules. So it's a little bit more than you asked, but I
12 couldn't resist.

13 BOARD MEMBER NANDWANI: Right. And I read that
14 because I have this in front of me. And now we have the
15 organic pullulan, but still, as you already mentioned, that
16 it's not still in the market and it's probably going to take
17 years, maybe to, I'm not sure. But we do have the option of
18 organic pullulan now, right?

19 MS. WYARD: We do. And it's very exciting. And I
20 did bring some labels to pass around, but I'll let you go out
21 there and find them because that's always a fun scavenger hunt.
22 I like to play that game with my friends.

23 BOARD MEMBER NANDWANI: Thank you. That's all I
24 have.

25 MS. WYARD: All right. Well, thank you so much. And

1 thank you, everybody.

2 CHAIR SMITH: Oh, one more question. Amy has a
3 question for you.

4 MS. WYARD: Amy! Hello, Amy. Oh, there you are.
5 Right down there.

6 VICE-CHAIR BRUCH: Hi, Gwendolyn.

7 MS. WYARD: Hi.

8 VICE-CHAIR BRUCH: Thank you for joining us today.
9 The nock-nock joke was great. So hopefully, Steve has one that
10 will rival your nock-nock joke. I don't know if he will or
11 not.

12 MS. WYARD: I think he will, yeah. And I don't know
13 if we heard the laugh-o-meter to see, you know, who's going to
14 win that. But --

15 VICE-CHAIR BRUCH: Yeah, hopefully.

16 MS. WYARD: I'm not competitive.

17 VICE-CHAIR BRUCH: I miss those, the laugh-o-meters.
18 So you'll have to keep me posted.

19 But anyway, I want to ask you a question on residue
20 testing. Actually, I wanted to challenge you to come up with a
21 solution. You mentioned in your written comments about a
22 challenge that we have when we're looking at when specific
23 tolerances don't exist for a processed commodity. And the NOP
24 instruction asked certifiers to use the tolerance for the raw
25 commodity. And I didn't know if you had any insight on what we

1 can offer up for a solution to that challenge.

2 MS. WYARD: I'm going to refrain from answering that
3 question here. We are, as a group, working on it. Johanna
4 Phillips, who was the lead on those comments, she would
5 probably be better suited to answer that question. But I mean,
6 that is a great question. And I absolutely promise you that
7 we're going to come up with some options for solutions on that
8 one. I know, it's so unsatisfying. I'm sorry.

9 VICE-CHAIR BRUCH: No problem. I'll put it on my
10 punch list to sort of follow up.

11 MS. WYARD: Absolutely. Thanks.

12 CHAIR SMITH: Allison, please go ahead.

13 MS. WYARD: Hi, Allison.

14 BOARD MEMBER JOHNSON: Hi. Thank you so much for
15 your comments. I just wanted to follow up on Dilip's question
16 for, I'm going to test my pullulan --

17 MS. WYARD: Nice.

18 BOARD MEMBER JOHNSON: -- to see if I heard you. It
19 sounds like you're saying we could sunset it because there's
20 organic supply. Or were you saying we're probably close, but
21 not quite there?

22 MS. WYARD: I think that there's still a little bit
23 more research to do. I just started working with the company
24 that's making it domestically. And so the numbers that I
25 shared really need to be looked at, you know, relative to what

1 the total demand and capacity is. I know that they're not
2 fulfilling their capacity but that is because there are cheaper
3 versions out there that are coming, that are international.

4 And then there's also some questions around the --
5 how brittle the capsules are. And so for certain technologies
6 and certain mechanics, there's some considerations there. You
7 know, and it's an interesting question because I think I would
8 rather see somebody petition to take it off the National List
9 than sunset it at this time because there still is a lot to
10 work out. And then keep in mind that it is for the made-with
11 category.

12 So organic is there. It's available. And for right
13 now, as people are kind of building up and changing, I would
14 rather see the shopper and the market drive us there and keep
15 it on the list and then have the petitioner or somebody else
16 say, now it's time for it to come off. But it is just for the
17 made-with category. People always can use the organic version.

18 CHAIR SMITH: Thanks, Gwendolyn. All right. Thank
19 you, everyone.

20 Next up, David Will, then Bill Wolf, and then Ben
21 Lehman.

22 MR. WILL: Michelle, for the record, I always want to
23 follow Gwen. Okay. Thank you. There's people I don't want
24 to follow, but Gwen's perfect.

25 Thank you very much. My name is David Will. I'm

1 Vice President of Sales, Chino Valley Ranchers, and I am the
2 chair of the Methionine Task Force. And that is what my
3 comments are directed for you today as the chair of the
4 Methionine Task Force.

5 In front of you, you have a binder that we hired a
6 ghostwriter to do for us. And this was a deep dive that was
7 everything methionine since the inception of the National
8 Organic Standards Board. So you have at the very front are
9 about the first 96 pages of all the testimony and reports that
10 have been presented by our group and other groups. And then
11 inside is a zip drive of the other 391 pages of antidotes,
12 links to click on, and other reports that you can go through
13 and take a peek at. So there's everything in here. Methionine
14 is mentioned in a meeting, you have it in front of you. So
15 it's not biased at all.

16 On our slide presentation for you, our group is
17 represented by the vast majority of the organic egg producers
18 and broilers in the country. More than 80 percent of egg
19 farmers and more than 70 percent of broilers are members of our
20 group. That includes pastured, free range, and what's called
21 conventional organic production. So we have the full gambit of
22 all production under our umbrella.

23 You know, the big question is why we use methionine.
24 And the big reason is because it is an essential amino acid and
25 it has no lysine in it so it helps us with that and it has a

1 nice protein value. If you look at, there's the most leading
2 potential substrates that we can use. Obviously, black soldier
3 fly jumps out at the top. And then number three is sunflower
4 meal, which was interesting. Our company uses a fair amount of
5 sunflower meal for a particular egg. However, we're only
6 feeding 30,000 birds on it. We're constantly stressed with
7 getting enough product for it.

8 If you take a deep dive into the black soldier fly,
9 currently, if you take the 35 million organic laying hens that
10 are in production in the United States every day, that works
11 out to being about three billion pounds of organic feed
12 produced annually. At the two pounds per ton, we're currently
13 using three million, about 3.2 million pounds of methionine
14 annually at the two-pound-cap or average over the lifetime of
15 the flock.

16 Black soldier fly, in order to replace it at 100
17 percent, must be fed at the rate of 280 pounds per ton in order
18 to equal the same as the two pounds of methionine that were
19 used, or 447 million pounds of black soldier fly larvae
20 annually. Unfortunately, that's a dried figure. If you take
21 it as a liquid, which we use six pounds per ton, it's a little
22 over two billion pounds.

23 On top of that, every pound of black soldier fly, you
24 get about two and a half pounds of a byproduct of fertilizer,
25 which isn't a bad thing, but it's something additional that we

1 need to work on. On top of that, it's whether the bird's going
2 to eat and the fact that it's also not ASCO certified yet. So
3 that's where we're at with black soldier fly.

4 CHAIR SMITH: I've got a question from Nate. Please
5 go ahead.

6 BOARD MEMBER POWELL-PALM: Would feeding a black
7 soldier fly impact your ability to label eggs as vegetarian-
8 fed, or is that something that you do, or do you have an
9 opinion about that tension or potential tension?

10 MR. WILL: You know, Nate, there's birds outdoors and
11 indoors are always going to eat a certain amount of
12 invertebrate, and I think that we're okay with that as an
13 incidental. When we're starting to put that in as a feed, we'd
14 probably have to run it through a legal challenge and see what
15 that worked out to, because then, now we are intentionally
16 including it into the ration.

17 CHAIR SMITH: Kim, please go ahead.

18 BOARD MEMBER HUSEMAN: I have a quick question
19 regarding -- you kind of skimmed over real quickly the
20 availability of sunflower meal in the diet. Can you speak a
21 little bit more to that? Assuming your production is West
22 Coast focused?

23 MR. WILL: We work throughout, up to the great
24 Mississippi Ocean, we have production and packaging available.
25 We do a particular product. We do -- one of our lines is a

1 soy-free egg, and one of the big replacements we found for that
2 is sunflower meal. And we have about 30,000 birds on it at all
3 times, and we have been challenged finding a source. Now I
4 will tell you, at Expo West this year, I had five people come
5 up and tell me they now offer organic sunflower meal, so we're
6 exploring that.

7 But I also asked our nutritionists, is non-organic
8 sunflower meal something that we might be able to find, trading
9 off a synthetic for a natural? And they said it's really not
10 available out there as a feed ingredient either. I feel it's
11 considerably limited.

12 The one company that's doing black soldier fly that
13 I've spoken with has 100,000 square-foot building, and they're
14 going to produce 3500 tons -- 3,500 tons annually, which is
15 about 1 percent of our national need.

16 BOARD MEMBER HUSEMAN: Talk to me about sunflower
17 meal.

18 MR. WILL: Yeah, happy to afterwards.

19 BOARD MEMBER HUSEMAN: I know where it's produced.

20 MR. WILL: Yeah.

21 BOARD MEMBER HUSEMAN: Both in -- inside the United
22 States.

23 MR. WILL: Yeah, we source from everywhere. Always a
24 struggle.

25 BOARD MEMBER HUSEMAN: I think logistical constraints

1 can be, you know, as we talk about U.S. infrastructure. But
2 I'm always trying to challenge, not only inside of, you know,
3 as we talk about methionine, but we also talk about soybean
4 meal stability. What alternative proteins?

5 We've heard from farmers about, I'm not going to grow
6 sunflowers because there's not a market. You know, trying to
7 help to stabilize that.

8 My other question, I guess kind of in the same space
9 would be, and I appreciate that the methionine task force have
10 talked to other people about this too. It's so impressive. Do
11 you feel like the market would abuse methionine if there wasn't
12 a limitation set on it?

13 MR. WILL: It's like anything. There's a high side
14 and a low side. You always hit the law of diminishing returns.
15 You know, but understand at the start, we started with no
16 average whatsoever. We were allowed to use it. Then we got a
17 four-pound cap placed on us. Then it was cut to two pounds.
18 We came back and we asked it go to an average over the life of
19 the flock because you don't feed a child like you do a senior
20 citizen. And we were granted that. And I think the majority
21 of people have been able to work under that system.

22 I think if you remove the cap, there would be
23 instances that people would use more than what they currently
24 are. But over the life of the flock, I don't see that changing
25 dramatically. It's the most expensive ingredient we put into

1 our feed. And unfortunately, black soldier fly is twice as
2 expensive currently. It's over \$6,000 a ton.

3 BOARD MEMBER HUSEMAN: Thank you.

4 CHAIR SMITH: Amy, please go ahead.

5 VICE-CHAIR BRUCH: Yeah, David, thanks for your time
6 today. Just -- I'm kind of piggy backing off of my partner,
7 Kim, that's downstream in the value chain from me, as a
8 producer, that your comment on the sunflower meal really perked
9 my ears. And were you running into sourcing challenges just
10 with the process piece, process capacity in the U.S.? Okay.
11 Or --

12 MR. WILL: And international. We got a lot of it
13 from Mexico for years.

14 VICE-CHAIR BRUCH: Okay. Okay. This, I'm just
15 highlighting, would be an incredible opportunity for
16 infrastructure needed in the U.S., because you have a need for
17 it. And there's a lot of producers very close to you that can
18 grow these sunflowers.

19 MR. WILL: Absolutely.

20 VICE-CHAIR BRUCH: Thank you for bringing that up.

21 MR. WILL: Sure. And then you need a home for the
22 oil, obviously, because we're getting the crushed part out of
23 it.

24 VICE-CHAIR BRUCH: Absolutely. Thank you.

25 CHAIR SMITH: Nate, please go ahead.

1 BOARD MEMBER POWELL-PALM: Thank you for your
2 comments. Could you speak to the animal welfare implications
3 of underfeeding methionine?

4 MR. WILL: Well, it's called essential for a reason,
5 Nate. Everything that a chicken does is all based off the
6 receiving of the proper essential amino acids. You'd mentioned
7 overfeeding or the feeding of sunflower -- soybean proteins.
8 We did that at the start when we had the hard cap, especially
9 with young chickens. And we saw instances of feather pecking,
10 extreme nervousness in flocks. We -- you know, you walk a
11 house of brown chickens, and you literally have to shoo them
12 from underneath your feet. It's like walking through an ocean
13 of fish, because they flock.

14 And when we had methionine deficiencies, especially
15 the first 30 weeks of age, they acted like white birds. They
16 were flighty. They were sketchy. They just didn't want to be
17 associated with you and didn't want any contact. So we had
18 problems with that.

19 When we were overfeeding soybean, we got additional
20 ammonia in the chicken houses. We were getting hot feet
21 because of the extra soybean that was not being digested. So
22 we were having foot issues as well. So it's all across the
23 map, and it is a significant impact to their welfare.

24 BOARD MEMBER POWELL-PALM: Thank you.

25 CHAIR SMITH: Thanks so much, David.

1 MR. WILL: You're welcome. Have a good day.

2 CHAIR SMITH: Up next, we have Bill Wolf, followed by
3 Ben Lehman, and then Noah Wendt.

4 MR. WOLF: Do I have to introduce myself? Hey, I'm
5 Bill Wolf. I'm CEO of Wolf & Associates and owner of Second
6 Star Farm. First, I really want to thank all of you for your
7 amazing work and your dedication. You're doing a great job.

8 My comments today focus on actions you can take that
9 will increase U.S. organic acreage with integrity. Slide two.

10 For over 50 years, earthworms have guided my organic
11 farming practices. Some of the guides -- some of my guides are
12 here with me today. So I'm going to open a can of worms and
13 observe a number of issues. Hi, guys.

14 So, slide three. Okay. Please consider our many
15 written comments from sunset to essentiality to assuring the
16 National List is a useful toolbox. I won't read everything on
17 slide three, there isn't time. But I'd like to go on to slide
18 four.

19 Now, some specifics to increase U.S. organic acreage.
20 Slide four, please. Do I do that? Oh, I do that. Okay.
21 Well, I'm going to have to go real fast now.

22 Some specifics. So, organic pet foods now and moving
23 forward, and it's going to help. Organics in the farm bill,
24 asking for 5 percent of all USDA RNA, an organic marketplace,
25 organic order checkoff, an in-transition label, an increase,

1 and really create a level playing field for U.S. organic
2 farmers.

3 U.S. farms, slide five. Oh, I get to do it. Cool.
4 Didn't used to. U.S. farmers are being hammered by imports.
5 The U.S. is 46 percent of worldwide sales, but less than 2
6 percent of organic acres. This figure -- these figures are on
7 this chart and well documented. What's wrong with this
8 picture?

9 Good Lord. From 2008 to now, organic has grown from
10 \$25 billion to over \$70 billion, with U.S. acreage not
11 increasing. Off share -- offshore production has filled that
12 demand.

13 So what do we do? Well, there are a lot of things.
14 One of them is we can -- we need to update residue testing
15 guidance for certifiers and coordinate testing and publish
16 results. We need to -- and we need to solve the inerts
17 roadblock. It's keeping practices out of the hands -- good
18 practices and important products out of the hands of U.S.
19 growers and stifling innovation.

20 Okay. Here we go. The current uncertainty of -- the
21 current policy about inerts has stalled pest control choices
22 for growers. Formulators need stable regulations and stable
23 predictability in order to get U.S. organic farms the tools
24 they need.

25 Outside the U.S., inert carriers are not scrutinized

1 in this way.

2 CHAIR SMITH: Thanks, Bill.

3 MR. WOLF: Yeah.

4 CHAIR SMITH: Questions? I see Logan. Please go
5 ahead, Logan. Hi, Logan.

6 BOARD MEMBER PETREY: Thank you. It's easier to do
7 it that way than the reactions. Hi, Bill. Good to see you.

8 So, I have a question, actually, not one that you
9 brought up here. It's from your written comments. It's on
10 CO2, the petition.

11 MR. WOLF: Uh --

12 BOARD MEMBER PETREY: Is that okay if I ask that?

13 MR. WOLF: I can tell you that it was very carefully
14 thought through by a group.

15 BOARD MEMBER PETREY: Okay.

16 MR. WOLF: And that answer would better be provided
17 by John Foster, who oversaw that.

18 BOARD MEMBER PETREY: Okay.

19 MR. WOLF: And he'll be speaking in a couple of
20 minutes.

21 BOARD MEMBER PETREY: That's no problem. I'll wait
22 for John. Thank you.

23 MR. WOLF: Yeah. Sorry to -- sorry. I really --

24 BOARD MEMBER PETREY: That's okay.

25 MR. WOLF: I'm aware of it, but I'm not an expert on

1 it.

2 BOARD MEMBER PETREY: I was going to ask you both, so
3 it's fine. Thank you.

4 MR. WOLF: Okay. Sure.

5 CHAIR SMITH: Nate Powell-Palm, please go ahead.

6 BOARD MEMBER POWELL-PALM: Can you go back just a
7 couple of slides to your growing organic markets? One more
8 back. More. More. More.

9 So, when we say, ask for 5 percent of USDA research
10 and education dollars, why in this community do we have such a
11 problem asking for more, asking for our fair share and all that
12 we represent?

13 MR. WOLF: Well, there -- it's important to
14 understand from what I've seen of the USDA funding that it
15 can't happen overnight because we have to have the
16 infrastructure to manage that money well. I mean, it's just
17 like the TOPP program and the interface with NRDC is hitting
18 some roadblocks that need to be solved over time. But the fact
19 is that this conversation about asking the USDA and Congress to
20 allocate the funds proportional to our industry is a basic
21 business principle. And even more, if you were running a
22 business, you'd go after where the growth is. So, we've been
23 asking this question for 25 years. This is where the growth
24 is, but we don't spend the money doing the R&D to support that
25 growth. And that's why the acreage is flat. I mean, we have

1 done so much to encourage imports by our inaction, that that's
2 the essence of that point.

3 BOARD MEMBER POWELL-PALM: I really appreciate it.
4 Thank you.

5 CHAIR SMITH: Thanks. Oh, sorry. Go ahead, Jerry.

6 BOARD MEMBER D'AMORE: Am I the only one in the room
7 that doesn't want to know how the worms are doing?

8 MR. WOLF: I would be happy -- glad to share with you
9 what's going on. First of all, it was a challenge, because
10 this is the first time they've flown. And they've never had
11 that kind of experience. And they've been pretty upset in my
12 hotel room. They've been fed.

13 CHAIR SMITH: Are they really worms? I need you to
14 hold it up.

15 MR. WOLF: They've been fed -- well, there's actually
16 two groups here. And there is some racial issues here, because
17 we talk about, you know, integration. There are red wigglers
18 from my two worm farms.

19 BOARD MEMBER D'AMORE: You sure you want to go down
20 this path?

21 MR. WOLF: They've worked it out. The -- but the
22 regular earthworms I dug up from an organic plot on Friday
23 afternoon. And they'd never traveled, and I mean, from the
24 organic plot, the reason I took them was that they're
25 descendants of Oliver. And Oliver was found in 2009 at the

1 USDA People's Garden, when Rodale was delivering a truckload of
2 organic compost. And a photograph of Oliver became your
3 mascot. And I can pass that around.

4 But Oliver, I brought Oliver home from that pile.
5 And these are descendants. So that's the bottom line.

6 The guys in the compost bins, on the worm compost
7 bins, all are getting organic coffee. When I got here, I
8 realized I didn't have any organic coffee grounds. And
9 actually, a coffee consultant that works for me went out and
10 found organic coffee grounds. I gave them some a few minutes
11 ago. And they're doing much better. Is that helpful?

12 BOARD MEMBER D'AMORE: And truly, I'm not sorry I
13 asked.

14 MR. WOLF: But they don't like the light. So I'm
15 going to protect them with a non-organic cotton shirt that I
16 was given by the NOSB years ago.

17 CHAIR SMITH: Thank you, Bill. Appreciate it.

18 MR. WOLF: Okay. No more questions.

19 CHAIR SMITH: I think we're good. I think this is
20 like right where we want to --

21 MR. WOLF: Any questions about endurance? Oh my god.
22 All right. Thank you.

23 CHAIR SMITH: Up next. Ben Lehman. Then we have
24 Noah Wendt. And then Kate Mendenhall.

25 Just a reminder to state your name and affiliation.

1 Also, if you have slides, there's a slide advancer on the
2 podium. So, you can advance your own slides. Go ahead.

3 MR. LEHMAN: My name is Ben Lehman. I work as an
4 organic consultant with Rodale Institute. I also farm organic
5 grain in Iowa. And thank you all for your time today. I also
6 want to say thank you to everyone here that's worked tirelessly
7 on the Transition to Organic Partnership Program, which we
8 believe has already shown itself to be a historic success in
9 the organic industry.

10 Rodale Institute's a non-profit that's dedicated to
11 growing the regenerative organic movement. Our team of
12 consultants help organic and transitioning farms across the
13 country to navigate the certification process, implement
14 practices that improve soil health, reduce risk, and connect
15 with reliable markets. I'm here today to share our experience
16 with the NRCS Organic Management Practice Standard, or 823.

17 823 provides conservation contracts for organic and
18 transitioning farms, running three or five years, with grain
19 farms under 1,000 acres receiving a minimum of \$210 per acre
20 per year and higher payments for farms growing fruits and
21 vegetables or integrating livestock. It requires nutrient
22 management plans, which encourage farmers to closely evaluate
23 fertility practices, and -- as well as vigilant scouting
24 records as part of a pest management plan. 823 contracts are
25 an extremely effective use of funding to protect our soils and

1 the environment.

2 Communication is critical for the success of any new
3 program. Our view is that communication has been a challenge
4 for 823, which has affected farmers' ability to access this
5 important source of funding. With a quick turnaround between
6 the program announcement and the first funding round meant
7 there was limited opportunity to outreach and many
8 transitioning organic farms had not yet developed a
9 relationship with NRCS. As we heard earlier, Iowa Organic
10 Association and Iowa State University responded to this need in
11 my home state, using TOPP funds to host 823 trainings, conduct
12 outreach to farmers, which resulted in 45 applications in Iowa
13 so far, including my own.

14 Unfortunately, awareness of 823 is highly variable.
15 For example, in 2023, Illinois led the nation with 142 contract
16 instances while neighboring Indiana had only five. A
17 nationally coordinated list of upcoming state deadlines to
18 apply for 823 could make outreach efforts easier for both NRCS
19 and supporting organizations and make sure that funding
20 allocated to help these farmers is utilized effectively while
21 still affirming locally driven processes.

22 Although 823 is adequate funding for transitioning
23 acres through the Organic Transition Initiative, there's
24 inadequate funding for certified organic acres. Some states do
25 not use general EQIP funds for 823, so no certified organic

1 acres are eligible. For states that do accept applications for
2 certified organic acres, 823 outreach is even more critical for
3 farmers' future success, as more applications may lead to
4 additional general organic EQIP funding. In either case, more
5 federal funding will boost this essential conservation program.
6 Thank you for your time.

7 CHAIR SMITH: Nate, please go ahead.

8 BOARD MEMBER POWELL-PALM: Ben, just want to say
9 thank you so much for your work across the country, but also
10 for your work with Rodale in helping organic farmers and
11 transitioning farmers. It sounds like from what Roz was
12 telling us earlier, that you've had a bit of success, maybe
13 more than other states, in being able to help farmers access
14 this 823 funding.

15 Do you have any tips or tricks for how you've
16 developed that relationship with NRCS? I know IOA has provided
17 training for NRCS and there's a growing relationship there, but
18 any takeaways that you would share with the other TOPP leads or
19 other folks working to help farmers get access to these funds?

20 MR. LEHMAN: I think, you know, what Roz had
21 mentioned earlier about those programs that do specifically
22 train NRCS agents on working with organic farmers, they're
23 going to be bringing a group of NRCS agents out to my farm as
24 part of this training. You need to really see these organic
25 farms in action and see how they work. Maybe challenge some of

1 the existing biases in offices associated with farms that do
2 tillage. And I think that is a big sticking point, especially
3 in some of our hillier areas, and one way we can boost more
4 acres.

5 BOARD MEMBER POWELL-PALM: So, farm tours of NRCS
6 agents on organic farms. How about that?

7 MR. LEHMAN: Yes. Talking to more organic farmers.
8 I think getting that real experience with organic farmers.

9 BOARD MEMBER POWELL-PALM: Thank you so much.

10 CHAIR SMITH: Amy, please go ahead.

11 VICE-CHAIR BRUCH: Yeah. Thanks for your time today
12 and talking about this important program, 823. I wanted to ask
13 you. You had some statistics on some states and their
14 acceptance rates for the deployment of 823. I believe you said
15 Illinois had over 140. Is that correct?

16 MR. LEHMAN: Yes, they track it in number of contract
17 instances, which is, I believe, fancy wording for the number of
18 contract years. So, 142 years contracted for farms to be in
19 823. Those contracts were either three or five years each.

20 VICE-CHAIR BRUCH: Okay. Well, that -- that's
21 helpful to just get data. And I don't know if there's any
22 other data available. I believe in Nebraska we had maybe two
23 applicants in the entire state. You mentioned, you know, a
24 certain amount in Iowa as well.

25 I was just -- this Illinois number is interesting to

1 me. Can we find out the number of folks that applied versus
2 the conversion rate of those accepted? Because if it's a high
3 -- I mean, there's just such a need for this program.

4 I'm trying to figure out, did people not apply
5 because they didn't know about it? Were there challenges in
6 the middle with execution of the documentation needed? Or, you
7 know, where is the root cause of the problem for not getting
8 successful, you know, connection between farmers and this
9 program? Because it is an incredible program. I believe it's
10 the second time it's been offered. And we just, you know, I
11 don't know who's shepherding this data, but that would be
12 helpful for us to try to understand it a little better so we
13 can get it fixed.

14 MR. LEHMAN: That's an excellent, excellent question.
15 And in the case of Illinois, we saw a huge bulk of the
16 contracts. In fact, one third of the entire national funding
17 in 2023 went to one county in Illinois. It just happened to
18 have a very strong, supportive, informal group of organic
19 farmers and supportive NRCS agents. But it wasn't being
20 heavily promoted by any formal organization or NRCS. So in
21 that case, I believe most of those contracts have been
22 successful from what I understood.

23 We did see farms like my own that are already a
24 certified organic farm. We don't have access to those OTI
25 dollars. We rely exclusively on the general organic EQIP

1 funds. In Iowa, we had 15 certified farmers apply for that.
2 There's only enough money in that general organic EQIP fund for
3 one contract on one farm. So, my contract was not successful.
4 My dad's contract on a transitioning field was successful. So,
5 plenty of funding on those transitioning acres, but that is the
6 big bottleneck on the certified acres for sure.

7 VICE-CHAIR BRUCH: Thank you so much.

8 CHAIR SMITH: Thanks so much, Ben. Appreciate your
9 time.

10 Up next, we have Noah Wendt, then Kate Mendenhall,
11 and then Kelly Damewood.

12 MR. WENDT: Do I start that or do you? Okay. All
13 right. My name is Noah Wendt with A&W Farms. I would like to
14 thank you, all you members of the NOSB, for hearing farmer and
15 related ag professional voices at your meetings. I feel that
16 continuing to have both in-person and virtual comments is
17 important and increases access for farmer participation.

18 I'm a member of the Organic Farmers Association, the
19 OFA Crop Insurance, and NOSB Working Groups. I'm a member of
20 the Iowa Organic Association Board of Directors and a TOPP
21 mentor. In 2006, I started farming together with Caleb Akin,
22 forming A&W Farms in Central Iowa. In 2015, we decided to
23 begin the aggressive transition from conventional to organic
24 production. Since 2015, we have transitioned 1,750 acres, or
25 2,800 acres, to organic production with another 300 in

1 transition right now. The crops that we grow are corn,
2 soybeans, sunflowers, oats, wheat, hemp, and field peas.

3 In addition to the farm, I have my own crop insurance
4 agency and farm real estate brokerage. Throughout our years of
5 organic production, we realized the need for a more local grain
6 elevator to take the crops that local organic farmers were
7 producing. So we decided to purchase an elevator on the east
8 side of Des Moines, Iowa, in early 2022.

9 Today, I would like to comment on the barriers to
10 entry of this market that we experienced. Number one, lack of
11 capital for a non-hedgeable commodity. This is where we
12 struggled to get grain purchased in desirable quantities
13 because we couldn't secure an operating note to purchase
14 inventory. There was too much risk for the bank to loan us
15 money. It would be great if the USDA would be able to
16 guarantee loans with local or regional banks to help small
17 businesses secure operating notes.

18 Number two, lack of infrastructure to efficient --
19 efficiently load rail cars to send to the east and west coast
20 feed mills. It would be great if the USDA could provide some
21 grants to allow small businesses to build infrastructure to
22 ship the product to the next user.

23 And number three, most importantly, the lack of end-
24 user interest in our product due to cheap imports. This
25 happened several times throughout our business experience. We

1 -- if we had credit to buy more grain from local farmers, that
2 doesn't always mean that we could get the grain sold for an
3 acceptable margin. Oftentimes, this forced us not to even
4 compete to buy the grain because our margins didn't justify
5 operating. The end-user would tell us that they wanted to buy
6 as much domestic grain as they could, but when it came time to
7 sell, they weren't willing to buy and would always go buy the
8 cheaper fraudulent imports.

9 After Jenny's talk this morning, I remain hopeful
10 that -- and confident that the SOE will give us relief that we
11 need. The TOPP program has done a great job helping transition
12 investment. However, if our country doesn't get import and
13 domestic fraud handled or more market development in place,
14 then the transitioning farmers' efforts are fruitless.

15 Unfortunately, due to the events discussed above, we
16 were forced to close our business in March of 2024. I do still
17 have the desire and hopefully financial wherewithal to make
18 this type of business happen. However, there needs to be some
19 fundamental changes first. Thank you for your time.

20 CHAIR SMITH: Thank you so much. Questions? Nate,
21 please go ahead.

22 BOARD MEMBER POWELL-PALM: Thanks so much for joining
23 us today, Noah, and really appreciate this very clear example
24 of the challenges we're facing to grow the organic market.
25 Could you speak a little bit more to what you, if we hadn't

1 seen prices crash, what you think your elevator would have done
2 for your community? Would it have provided a catalyst to get
3 more organic acres going? Would it --

4 MR. WENDT: I --

5 BOARD MEMBER POWELL-PALM: -- have been serving an
6 existing need? Please go ahead.

7 MR. WENDT: Sorry to interrupt.

8 BOARD MEMBER POWELL-PALM: No, no.

9 MR. WENDT: Yes, I definitely do. And that was
10 certainly the goal of the elevator, was to promote organic
11 production and actually try to form a community of organic
12 producers that were, you know, within maybe 50 to 70 miles,
13 that it was efficient for them to haul to us. And we would
14 have a resource there for them that they could store dry grain,
15 have all the different options that they need and not have to
16 take up space on the farm and burden maybe their non-organic
17 farming operation. And I certainly think, yeah, if prices
18 hadn't crashed and we were still running, we would have had the
19 chance to try to build that.

20 BOARD MEMBER POWELL-PALM: Appreciate you.

21 MR. WENDT: Yep.

22 CHAIR SMITH: Kim, please go ahead.

23 BOARD MEMBER HUSEMAN: Noah, thank you for being here
24 today.

25 MR. WENDT: You're welcome.

1 BOARD MEMBER HUSEMAN: I think having you present in
2 person and also as having the virtual comments period time,
3 goes to show that we appreciate the effort that you made to
4 come and also understand the people that can dial in virtually,
5 how important it is to hear the voice from the farmer.

6 My question around the infrastructure and the
7 logistics, can you speak to any communication you've had with
8 railroads and support from the railroad entities to help
9 provide maybe some benefit there on cost savings to build or
10 move product within the U.S. via rail?

11 MR. WENDT: Yeah, in the year and a half that we were
12 open, we did have pretty extensive communication with
13 railroads. And like usual with railroads, it was quite a fight
14 to get the cars when you wanted them and when you needed them.
15 Probably one of the biggest things that we struggled with was
16 the lack to have like dedicated organic cars. It was always
17 having to clean them out really thoroughly to satisfy those
18 standards of the people purchasing from us.

19 You know, I think other than that - other than those
20 things, the railroads, they were generally decent to work with
21 other than some of the usual logistical frustrations that go on
22 with them.

23 BOARD MEMBER HUSEMAN: Thank you, Noah.

24 MR. WENDT: Yep.

25 CHAIR SMITH: Thanks for, oh, sorry, one more. Amy,

1 please go ahead.

2 VICE-CHAIR BRUCH: Yeah, Noah, thanks for joining us
3 today. Thanks for all your commitment to the organic community
4 and your entrepreneurship. That's really important.

5 You mentioned about your end users talking about the
6 cleanliness of rail cars. And that got me thinking, you know,
7 when we're looking at imports, we're also looking at a similar
8 clean-out, potentially, process with ship holes and containers,
9 et cetera. Can you highlight some of the requirements that the
10 domestic end users were wanting you to go through to prove
11 integrity with these rail cars?

12 MR. WENDT: Yeah, good question. Generally, what
13 they wanted was swept and blown out. We never did have to go
14 to the extent of actually power washing them out. But that in
15 and of itself, sweeping and blowing them out is a pretty big
16 feat if you don't have, you know, the correct fall protection
17 and the correct equipment to get in there and do that job. And
18 oftentimes we found ourselves crawling underneath the car to
19 try to clean them out because we couldn't climb up inside of
20 them or -- from the top down. It was still a chore.

21 But that was the main thing, just sweep and blow them
22 out. And then obviously have our clean car affidavit that went
23 along with it.

24 VICE-CHAIR BRUCH: Thank you, appreciate that.

25 MR. WENDT: Yep.

1 CHAIR SMITH: Thanks so much for being with us
2 today, Noah.

3 MR. WENDT: Thank you.

4 CHAIR SMITH: Up next, we have Kate Mendenhall,
5 followed by Kelly Damewood, and then Phil LaRocca.

6 MS. MENDENHALL: Okay. Thank you, NOSB members, for
7 the opportunity to speak before you today. My name is Kate
8 Mendenhall and I'm the Executive Director of the Organic
9 Farmers Association. OFA was created for farmers by farmers
10 and they're the backbone of the organic farmer movement. And
11 we owe today's strong market to their hard work and continued
12 innovation.

13 Making sure that organic farmers have an equitable
14 playing field has always been a top priority of OFA. In fact,
15 during the seven years we have been established, stopping
16 organic import fraud has been a consistent number one priority
17 of organic farmers. The SOE has provided many new tools to
18 certifiers and authorities to the NOP, and together they must
19 implement risk-based and sound and sensible decision-making
20 that will curb fraud in the marketplace. Having continued
21 guidance from NOP around those high-risk protocols that would
22 support targeted increased scrutiny is incredibly important.
23 It's important so that low-risk operations are not overburdened
24 with paperwork and processes and so that operations that
25 present higher risk to the market bear the appropriate

1 enforcement and documentation to prove integrity is solid.
2 Continued clarity and support from NOP is important so that
3 certifiers implement risk consistently and appropriately. We
4 appreciate NOP's leadership on this and we know there is an
5 ongoing need for attention.

6 Hearing the import grain fraud back at the top of
7 farmer testimony breaks my heart. U.S. farmers do a great job.
8 Organic farming, as you know, is hard and they deserve an
9 equitable market. We also cannot encourage farmers to
10 transition to organic if the market is not secure and
11 stabilized. The NOP has the authority to require testing of
12 high-risk imports now. We're excited to hear about the pilot
13 with the Federal Grain Inspection Service and innovations like
14 this should expand to secure organic integrity in the
15 marketplace. We all know it's a problem and we need to work
16 together to fix it quickly.

17 USDA programs play an important role in supporting
18 farmer success and improvement. NRCS 823 has a lot of
19 potential and rollout has been discouraging. OFA encourages
20 the NOSB to pass a resolution calling on the Secretary to fix
21 the national rollout of NRCS 823 so that it's consistent among
22 states and transparent in its process so that the farmers who
23 want it can easily apply and keep farming. OFA will be
24 starting a farmer work group on this topic in the fall and any
25 farmers interested in working to improve 823 should get in

1 contact with us.

2 Farmers need adequate safety nets so that they can
3 survive to farm another season when they're consistently placed
4 in the nexus of consolidation and climate change. Dairy
5 farmers continue to struggle, crop insurance continues to need
6 significant improvements, and consolidation threatens to break
7 fragile supply chains and infrastructure. While the draft farm
8 bill may offer some improvements, this is a moving target and
9 we do need to stay on top of it. OFA has a farmer work group
10 on this topic as well and we're always looking for more farmer
11 experts. Perhaps some from the NOSB.

12 Diversity is a central tenet of organic and
13 prioritizing equity at NOSB and NOP provides collective
14 improvement for all farmers. OFA urges the NOP and the NOSB to
15 apply the USDA's 2023 Equity Commission recommendations and
16 embed racial equity in the NOSB processes, discussion
17 documents, and public meetings. Thank you for the opportunity
18 to speak.

19 CHAIR SMITH: Questions for Kate? Go ahead, Allison.

20 BOARD MEMBER JOHNSON: Thanks for your comments,
21 Kate. I was just shuffling, trying to find our transition
22 proposal that we'll be voting on, on Wednesday, gets at sort of
23 the overview of what's working and what could be improved in
24 the organic transition initiative including better coordination
25 among agencies. It sounds like you need -- you're asking us to

1 do something that goes beyond that and specifically call out
2 the 823 program, is that --

3 MS. MENDENHALL: When the EQIP organic initiative
4 came forward, we saw similar -- it took a few years until it
5 was known among producers. There was a system for implementing
6 it. I think the more national pressure we can have to get this
7 going faster, the better. So a resolution specifically asking
8 the Secretary to look at this program because it has so much
9 potential and there is a lot of interest from producers and the
10 rollout this year was so scattered, I think would be helpful.

11 CHAIR SMITH: Amy, please go ahead.

12 VICE-CHAIR BRUCH: Kate, thank you for joining us
13 today. Thanks for all the work OFA's doing for farmers.
14 Really appreciate hearing some of the upcoming working groups.

15 We had a comment, an oral or a webinar comment, the
16 other day about the need for organics to reach across the aisle
17 to some groups that maybe haven't participated in support of
18 organic programs. I think one was Farm Bureau. I believe Roz
19 mentioned, you know, some full-court press she was doing with,
20 you know, Pheasants Forever and things like that.

21 Do you see that to be a beneficial pathway to get
22 more attention on some of the needs that we have?

23 MS. MENDENHALL: Yeah, I've been thinking about that
24 since I heard that testimony. And at first I was like, oh, the
25 Farm Bureau. I just don't know about that one, being from the

1 State of Iowa. But I know that some states are really
2 effective. And I do think that organic is way beyond a niche
3 market.

4 I think that we need to be putting ourselves forward
5 in all of the agriculture sectors and really reaching and
6 forming relationships with agriculture groups, industry groups,
7 and showing up for organic farmers where they need us. I
8 think, you know, we need to do that as a community. And
9 education is always helpful. Organizations have to, of course,
10 like assess their capacity and find out where are they going to
11 make the most wins. So, yeah, I think, of course, when we can
12 bring in other groups to learn more about organic and perhaps
13 see that they have organic farmers in their area and the
14 benefit that they're making on environmental services in their
15 area and to communities, I think that's always a positive
16 thing.

17 CHAIR SMITH: Nate, please go ahead.

18 BOARD MEMBER POWELL-PALM: Thank you for your
19 comments, Kate. OFA has been very active in thinking about and
20 helping recruit new NOSB members. And I was wondering if you
21 could speak to how, as a community, we can chase two goals.
22 One, find representative folks who are going to come from a
23 diverse background, but also find folks who are really
24 competent and ready for this work. And how do we marry those
25 two up so that we don't set folks up for not success, you know,

1 on this board, but that we also hear from more people from
2 different places and backgrounds?

3 MS. MENDENHALL: Yeah. I think it should always be a
4 top priority to support diversity in everything we do organic.
5 It's hard to be a farmer and serve on the NOSB. It's hard to
6 be a farmer and like do other volunteer work in general. Any
7 type of self-employed business person, I think, feels that,
8 especially when you have like other board counterparts whose
9 time is being compensated to be here.

10 So I think whatever we can do as a community to
11 support farmers to serve on the board, and we should maybe,
12 perhaps, be innovative. I do think there's opportunities out
13 there to support, perhaps, BIPOC farmers with a fellowship to
14 serve on the NOSB during their five-year term, from foundations
15 who might want to help support leadership and increase voices.
16 I think we need to start linking those connections with farmer
17 leaders that we might know in our region and finding the
18 support so that they can afford to hire somebody to do the farm
19 work while they're at NOSB meetings or spending the eight hours
20 a week doing the NOSB work that needs to be done.

21 I think we need to be thinking about the needs of
22 English-second-language folks on the board and what kind of
23 supports can the USDA provide, whether there's materials in
24 their first language or simultaneous translation. Sometimes
25 the technical stuff can just be really hard, even if your first

1 language is English. So, you know, any kind of those sorts of
2 supports that we can pull. But just encourage the community to
3 really look into the connections that we have, to find a
4 diverse set of qualified leaders.

5 BOARD MEMBER POWELL-PALM: Do you feel like we know
6 who those rock stars are that we want to recruit? And are they
7 in the organizations that are involved with NOSB? Or do you
8 think there's some recruitment and just searching that we have
9 to do still?

10 MS. MENDENHALL: I've talked to many rock stars who
11 do not feel that they have the time to serve. So I think that
12 we all need to be looking and talking and encouraging about the
13 impact. I think that when NOSB recommendations move faster
14 into rulemaking, people can see how their time served on the
15 board might make more of an effect and it might feel like they
16 can actually make more of an impact. So I'm -- it's good to
17 see these final rules coming out and I just encourage more of
18 it so that there is sort of an impact represented for the time.

19 BOARD MEMBER POWELL-PALM: Thank you.

20 CHAIR SMITH: Thanks so much, Kate. Thank you.

21 Next up, Kelly Damewood, followed by Phil LaRocca and
22 then Scott Rice.

23 MS. DAMEWOOD: Hi, I'm Kelly Damewood, CEO of CCOF,
24 and I serve on the Management Committee of CCOF Certification
25 Services. I'm not here today with a specific recommendation.

1 Rather, I thought it would be valuable to be here in person to
2 address the board and share CCOF's internal conversations after
3 reading a recent article about a CCOF-certified dairy in the
4 media.

5 The greatest strength of organic is federal
6 enforcement. The level of scrutiny, the consequences are
7 unmatched. The greatest challenge of organic is federal
8 enforcement. The rulemaking can be slower than we'd like and
9 producers have federal due process rights.

10 We, as a certifier, know that the standards are
11 strong, including animal welfare standards and we know the
12 certification process works. We know that inspections, whether
13 announced or unannounced, produce actionable results. We
14 investigate any complaint that comes our way and we do issue
15 corrective actions. And if corrective actions can't or won't
16 be taken, an operation will be suspended.

17 We know that the process works. This is not a swift
18 process. It's complex. And certifiers certainly don't have
19 unyielding power, but that is federal due process.

20 The standards prohibit certifiers from sharing
21 specific information about our clients. So what we often see
22 happen is a lack of understanding, distrust. Folks don't see
23 everything that's happening behind the scenes. So while we
24 can't share specific information about our clients, we would
25 welcome partnership and thinking about, well, how can we be

1 more proactive and at least explaining at a high level, the
2 enforcement process and educating the public about organic
3 certification?

4 And beyond organic certification, I just want to
5 speak to the article in referencing itself. In the article,
6 the reporter says, the system failed the cow. And I disagree.
7 The system is failing the farmer. And when you fail the
8 farmer, you fail the cow and you fail the land. And when we
9 fail the land, we fail us all.

10 The article did not talk about the tremendous
11 economic pressure on dairy, loss of markets, loss of land, how
12 when dairy goes out of business, it's not replaced, they don't
13 come back. And the premium highlighted in the article, is that
14 really held by the farmer or the retailer?

15 So when we read articles like this, yes, as a
16 certifier, we absolutely look inward. We evaluate, is there
17 something, if anything, we would do differently or better. But
18 as a member-based organization, we also look at the bigger
19 issues, the systemic issues at play, and ask, how do we support
20 the farmer? Because when we support the farmer, we support the
21 cow, we support the land. And then we truly transform our food
22 system.

23 So again, no specific recommendations today. I just
24 thought it was important to be here in person and answer any
25 questions and welcome conversation if you have it. Thank you.

1 CHAIR SMITH: Thanks so much, Kelly. Just for a
2 fellow certifier, I appreciate the context. I worked in food
3 service for a long time, probably too long. And I always said
4 that, jokingly, but in order to like, eat in a restaurant, you
5 had to show you're like, I worked in food service card. And I
6 sort of feel the same way about certification and inspection.
7 I feel like everybody should have to do their time in
8 certification and inspection.

9 Nate, please go ahead.

10 SECRETARY LEWIS: I really appreciate the sentiment
11 and you being here in person. So in my work at the Washington
12 Farmland Trust, we have historically focused on conserving
13 farmland that was being lost to development through
14 conservation easements and really had a land-focus on our work.
15 We are slowly transforming our organization to be more farmer-
16 focused with conservation easements and land conservation being
17 one tool in our toolbox for supporting farmers. So I'm
18 curious. It sounds like CCOF is in a similar type of dynamic
19 change around centering farmers. Can you talk about some of
20 the things that CCOF is doing to center farmers in your
21 advocacy work and certification work?

22 MS. DAMEWOOD: Yeah, absolutely. And Nate, it's been
23 a while, but nice to see you on that side of the bench for a
24 change.

25 It's a little bit of everything. Sometimes it's

1 financial assistance, financial aid. Sometimes it is advocacy,
2 protecting conservation easements, protecting land. In
3 California, there can be a lot of misunderstanding from
4 environmental groups about what organic livestock impact on the
5 environment can be. Increasingly, education and technical
6 assistance, including bilingual assistance for Spanish-speaking
7 farmers throughout the State of California.

8 So it's really looking at all different angles, and
9 it's going to depend on the farmer's need, region, and
10 location. But that's really how CCOF was built. So it is
11 certification, but if we don't have farmers who are succeeding
12 and who are in business, we can't have organic certification.
13 So then we have financial aid programs, and then we have
14 education programs and granting programs. It really is a
15 little bit of everything. So, thanks.

16 CHAIR SMITH: Wood, please go ahead.

17 BOARD MEMBER TURNER: Thanks. Thanks, Kelly. I
18 appreciate you having the guts to show up. We really needed to
19 hear from you today, and I really appreciate you doing that. I
20 mean, it's just a thing we do often in the organic movement,
21 take that criticism and put our tails between our legs and hope
22 somebody else is going to speak on our behalf. And I
23 appreciate you standing up and saying what you said today.

24 I am curious if you, and you mentioned retailers
25 specifically, and I'm curious if you think the retail toolkit

1 that was described earlier today has the potential to actually
2 improve some of these dynamics and work for farmers and work
3 for cows. I mean, are -- to me, I think it's a powerful step
4 forward, but there's a lot of diversity among retailers and a
5 lot of different kinds of consumers, and I'm just curious if
6 you had any reaction to that.

7 MS. DAMEWOOD: Yes, thank you. Yeah, absolutely. As
8 much consumer education as possible, but what's also broken is
9 how that price premium is translated down to the farm. In
10 California, for example, the regulations keep upping and upping
11 and upping, and organic certification, we're incredibly proud
12 of strengthening organic enforcement, proud to be implementing
13 it, seeing the impacts. Absolutely, it's increasing the costs
14 of certification. And as these costs are increasing, how are
15 we supporting the farmer on the other end?

16 So in California, if we increase, increase
17 regulation, and then the state is sourcing for their
18 institutions from other countries or other states, then what
19 are we really accomplishing? And so we really have to look
20 across the entire supply chain when we're looking at rule
21 changes, market dynamics. So it's really a little bit of
22 everything.

23 And I just, you know, want to emphasize, this is very
24 important to us. Again, the process is working, and that
25 doesn't mean we can't do better. We're looking at our own

1 systems. Are there different processes we might want to put in
2 place for larger dairies, for example? You know, we're not
3 afraid to challenge ourselves, but by and large, we're really
4 proud of the work we're doing and can stand with confidence
5 behind the organic label.

6 CHAIR SMITH: Allison, please go ahead.

7 BOARD MEMBER JOHNSON: Thanks for being here, Kelly.
8 I -- every time I see one of these headlines that says, you
9 know, the real truth about organic, or, you know, here's what
10 you're not seeing in organic, my heart just sinks because often
11 it's picking at the edges of a really good system and not
12 showing the big, big picture where organic is doing a lot
13 better than the vast majority of agriculture. And I think one
14 of the reasons that these articles get picked up is that
15 consumers don't understand agriculture. You know, I'm still
16 learning every day, something new. So I think your average
17 consumer has no idea what a dairy operation looks like, period,
18 and what a reasonable expectation of animal health looks like
19 over the course of an animal's lifetime, things like that.

20 So I wonder if you have thoughts about how we can
21 help consumers understand that it's not like dreamland or the
22 worst of the worst, but that there's sort of a practicality of
23 agriculture that we all should understand as consumers of food.

24 MS. DAMEWOOD: Yeah, absolutely, Allison. And what's
25 interesting, if you look at the commentary on the article I was

1 referencing, it's really more debate about veganism versus it's
2 not really organic versus conventional. It's more about the
3 value of livestock products in general. So absolutely across
4 the board, educating.

5 I just want to uphold and commend the Organic Market
6 Development Grant Program. And we'll be launching the first
7 national digital streaming advertising campaign, really
8 uplifting the organic certification process, trying to do it in
9 a non-wonky way and speak to maybe folks outside of this room
10 about what does organic mean. And we need to step that up
11 beyond, I mean, we need to be on digital platforms and we need
12 to be thinking like strategic marketing professionals. And
13 that's an increasing area of investment for CCOF. And I want
14 to commend all of those working to establish funding for this
15 grant program through the farm bill. And I can't think of a
16 more exciting and more important farm bill priority than the
17 Market Development Grant.

18 CHAIR SMITH: Thanks so much for being with us,
19 Kelly.

20 MS. DAMEWOOD: Thank you, Kyla.

21 CHAIR SMITH: Up next, we have Phil LaRocca followed
22 by Scott Rice and then Charles Benbrook, and then we're going
23 to take a break.

24 MR. LARocca: My name is Phil LaRocca. I am a
25 longtime organic farmer, first certified in 1975. I've been

1 the owner, winemaker, grape grower for LaRocca Vineyards for 44
2 years. I sit on the California Organic Product Advisory Board
3 and I am the Chairman of the Board of Directors for CCOF. And
4 I think Kelly did a pretty good job. I had a couple of
5 comments to make, but I'm going to hold it with her there.

6 I'm going to make a few comments on some winemaking
7 materials that you're going to look at. One is yeast, which we
8 use for fermentation. The other is malic acid, which we use as
9 a secondary fermentation, i.e., a bacterial fermentation. And
10 the third is parasitic acid, which is extremely essential to
11 organic winemakers and beer makers.

12 The next point I want to bring, which kind of
13 coincides with hers, is the importance of marketing organic for
14 everybody. We -- I have a 12-member -- 14-member board. We
15 are divided up into regions in the state of California,
16 California being a major player in the organic industry.

17 Every region, every representative on my board comes
18 back saying we need marketing and we need the consumer to be
19 educated. When I have one of the largest stone fruit growers
20 in the nation come and call and say, Phil, I'm going to get
21 more money by selling this crop conventional than I am organic,
22 or I have a small grower come and say, I can barely hang on,
23 that's totally unacceptable.

24 And I want to make a point on the small grower right
25 now. Everybody in this room is here because this industry was

1 built on the back of the small farmer. It's a small family
2 farmer built this organization to where it is today, back in
3 the 70s. And then mentioned earlier, Bill said we're a \$79
4 billion company.

5 Well, let's look at this. That means people are
6 spending \$79 billion on organic product. We need to look and
7 say, why are they buying this product? Are they buying it
8 because it's healthier for the environment? Better to fight
9 climate control? You know, is it healthier for people? I like
10 to use the term, pay the farmer, not the doctor. Is it better
11 because it just tastes better?

12 Well, the answer, I think, is all of the above. And
13 we need to get that out to the consumer. We've always been
14 afraid to say that we're better. But we are better.

15 I wouldn't -- if you're an organic farmer, we take so
16 many risks that we could solve. You know, if you have a weed
17 problem, I got to go with a mechanical cultivation or I got to
18 go with hand cultivation. If I went in with my glyphosate,
19 bada bing, problem over. We go through a lot. And we need to
20 tell that to the consumer that this is what this extra premium
21 is.

22 And the word premium kind of irks me a little bit.
23 There really isn't a premium. Like when we're putting a new
24 vineyard in, I'm going to bring 20 people out with hoes and
25 weed eaters. Or again, I can go with a tractor and glyphosate,

1 take care of the problem. So there's not premium.

2 What we get is -- the money we're making is just the
3 cost of doing business organically. And we need to get this
4 out to the public. We need to say we are better. There's a
5 reason why you're buying organic because obviously you think
6 it's better or you wouldn't be spending \$79 billion a year.
7 And we shouldn't be afraid to say that.

8 CHAIR SMITH: I love it. Amy, please go ahead.

9 VICE-CHAIR BRUCH: Yeah, thanks, Kyla.

10 Phil, thanks for joining us today. Thanks for your
11 strong message. Really appreciate hearing your comments. And
12 I do agree with your comment on the price premium. I -- it's a
13 cost of doing business. And there's a lot that goes into
14 growing organic foods and so I don't know if price premium is
15 quite the right term we need to be using. So I thought that
16 was a good point.

17 I wanted to ask you, earlier today we heard from
18 Dr. Jenny Tucker about some of the early wins with the SOE,
19 Strengthening of Organic Enforcement Act, and how that related
20 to wine. With our equivalency partners through the SOE, they
21 were noticing some of the imports we were receiving actually
22 had ingredients that were not allowed for organic production in
23 the U.S. So can you just talk the impact, the early impact
24 that you've seen in the area from some of those SOE wins?

25 MR. LARocca: Absolutely. We had this dialogue last

1 year. And what is hurting the organic wine market right now is
2 imports coming in, especially from Italy and France. Now,
3 besides the fact that they were not being -- playing fair, and
4 I know this because I helped write the rule. And again, in
5 winemaking, they were cheating, basically.

6 But the other problem that we have to deal with, and
7 I don't know if this board necessarily can, is that those grape
8 growers and winemakers are subsidized. We are not. So we have
9 to deal with issues of they're given a guaranteed price in
10 Italy for their wine or their grape, whether they want to do
11 it. Imports coming in from Chile and Argentina, I was just
12 there a couple years ago, they're paying their labor \$10 a day.
13 In California, we're at minimum wage right now at \$20 an hour.
14 So those are the problems that we have in the wine industry.

15 We're doing fine here. It's cheap imports coming in
16 that are being subsidized and perhaps cheating that is hurting
17 the cause.

18 CHAIR SMITH: Nate, please go ahead.

19 BOARD MEMBER POWELL-PALM: Phil, I say this with all
20 due respect. You were made for TikTok, man. Like, you could
21 slice and dice just three minutes up. It was great. I really
22 appreciate how many good one liners you had built in there. .

23 MR. LARocca: I am the worst computer guy on the
24 planet, yeah. You know, I can grow most things.

25 BOARD MEMBER POWELL-PALM: We'll get you a little

1 millennial to make that happen.

2 MR. LAROCCA: I'm my own IT guy from CCOF. That's
3 how bad I am.

4 BOARD MEMBER POWELL-PALM: Well, thank you for
5 everything you said. I was -- I have two questions for you.
6 The first one is, do you think it's a good path forward to
7 think about how every raw ingredient we send to the EU or to
8 Canada, they test, or a lot of what we send them, they test.
9 And we test very little that's coming from them to us.

10 Do you think just plying catch up, that might be a
11 way just to understand what's coming over as we figure out this
12 market condition we're currently experiencing?

13 MR. LAROCCA: I agree with that as long as it doesn't
14 increase the price to our American growers, as long as we don't
15 have to see a price increase. As Kelly and I were talking
16 earlier, I think it's costing us 80,000 bucks to get into our
17 new program, which I do think it's worth it. But again, we're
18 getting, as a matter of fact, just yesterday at NOC was the
19 first time I heard, we've always been grumbling about paying
20 certification costs, but the grumbling is a little bit stronger
21 these days because I think we're all experiencing a hard market
22 right now.

23 Literally, when I -- we have the largest carrot
24 grower in the United States on our board. And when they start
25 saying we need marketing, you know, we need marketing. We need

1 to promote organic.

2 BOARD MEMBER POWELL-PALM: Absolutely. And the
3 second question I have for you, and this is sort of, in this
4 room, I would say better than anywhere else in agriculture,
5 we're good at coming together. And you gave us so many good
6 takeaways for the message we should be getting out to
7 consumers. How do you think we start to organize, to pool
8 funds in order to make that messaging campaign a reality?

9 MR. LAROCCA: Well, I think, quite frankly, if you're
10 asking me, I think the organic farmers should be subsidized by
11 the federal government, because I think we're doing such a good
12 job keeping the planet healthy and people healthy.

13 But the toolbox was a good thing. I thought the
14 toolbox was lacking a little bit, and I don't know if this is
15 the correct word, but passion. I think we should come out and
16 say what I said earlier. This is our process, but we're doing
17 this process because we're offering you a product that is
18 healthier for the environment, healthier for human beings,
19 generally tastes better, et cetera, et cetera.

20 BOARD MEMBER POWELL-PALM: I can't thank you enough
21 for being here today. Thank you.

22 CHAIR SMITH: Thanks so much, Phil. Appreciate your
23 time.

24 Oh, sorry, Jerry, please go ahead.

25 BOARD MEMBER D'AMORE: I would personally like to

1 thank you very much for saying it, yourself, to this board that
2 there are some things we just can't do. You'll never know.
3 Well, maybe you can guess. But I have colleagues here with
4 whom I have spoken untold hours about how we affect the market
5 and how we can possibly change things. And the passion
6 illustrated by some of my colleagues is extraordinary.

7 But at the end of the day, there's some things we
8 just aren't supposed to be doing and we would not be effective
9 running that path. A lot of things we can do, but it's -- as a
10 producer to come up front and say, hey, I understand there are
11 things that you don't do. That's refreshing and I appreciate
12 it.

13 MR. LAROCCA: Thanks, Jerry. Appreciate it.

14 BOARD MEMBER D'AMORE: Yeah. Thank you.

15 CHAIR SMITH: Okay. Thanks. Up next, we have Scott
16 Rice followed by Charles Benbrook. And then we're going to
17 take a break.

18 MR. RICE: Good afternoon. Thank you for this
19 opportunity to speak with you. My name is Scott Rice and I'm
20 the Senior Director of Regulatory Affairs for the Organic Trade
21 Association.

22 OTA is a member-based organization representing
23 organic businesses across North America, from farmers to
24 handlers, retailers to manufacturers. OTA's mission is to grow
25 and protect organic with a unifying voice that serves and

1 engages its diverse members from farm to marketplace.

2 Having served on the board, I can appreciate the
3 perspective of both sides of this table. As a board member,
4 you have the desire to push forward on important work that is
5 near and dear to you across a term that passes far too quickly.
6 As a stakeholder, there is desire to carefully consider all
7 your good work and give it the attention it deserves. But just
8 as your five years passes before you know it, so does the 30-
9 day comment period and three minutes.

10 Simply put, it's not enough time, and no matter how
11 well and I and my organic colleagues give it its due, we'd love
12 to give it more. I'd like to echo the comments the other day
13 from Mike Dill, who brought some great ideas for addressing
14 this. Let's look for ways to further these conversations we
15 have twice a year, an open and even more fruitful dialogue
16 through listening sessions, town halls, the open docket, and
17 other great ideas waiting to be voiced. As we noted in our
18 written comments, we'll be gathering members this spring and
19 summer to inform comments on the compost and roots discussion,
20 and look forward to sharing the outcome of those discussions
21 with you via the open docket before you finalize your
22 materials.

23 Listening to the many hours of public comment in the
24 last couple of weeks, it's clear that despite having grown this
25 industry to historic levels, we still have work to do. Work to

1 get more producers to transition more acres and keep them
2 there. Work to keep existing organic producers in organic.
3 Work to educate consumers on what organic is, the value of the
4 seal, and that it continues to represent what they have come to
5 expect.

6 We often hear mention of the importance of the
7 public-private partnership that sets organic apart from other
8 systems, and rightly so. It is by working together, producers,
9 certifiers, USDA, organic stakeholders, that we have grown this
10 movement. But as we implement SOE with its potential for
11 increased record keeping and see FSMA traceability requirements
12 come into force, we see, as we see producers working harder
13 than ever for that organic dollar, as we navigate the challenge
14 that a price premium presents for access and wide market
15 adoption, there is opportunity for this public-private
16 partnership to work just as hard toward consistency, a sound
17 and sensible approach, and a fair and equitable playing field.

18 OTA is working to build bridges between regulation
19 and practice, and is piloting an organic regulation guideline
20 program, the goal of which is to provide actionable, practical
21 guidance to the industry that is aligned with NOP and
22 certifiers. This program offers the development of a
23 structured pathway to compliance and collaboration to bring
24 uniform implementation of standards. We look forward to
25 sharing more on this soon.

1 Thanks for all your hard work, and have a great week.

2 CHAIR SMITH: Thanks, Scott. Questions for Scott?
3 Carolyn, please go ahead.

4 BOARD MEMBER DIMITRI: Hi, thanks very much for your
5 comments. I have two thoughts. So one is, I've heard several
6 people say, like, we should have more meetings, more, like,
7 town hall things kind of spread out over the year. But on the
8 other hand, we have these discussions about how this is really
9 a burden, especially for farmers and underserved farmers. So
10 one is, like, I don't see how those two things can both happen.
11 That's one.

12 And then, the other comment I have is, I think about
13 OTA, you're kind of in a unique position in terms of you really
14 can interact with processors and handlers and a lot of the
15 companies that have a fair amount of bargaining power over
16 farmer producers. And then I think about organic seed, and I
17 think about the Organic Seed Alliance report that says one of
18 the main barriers to using organic seed is that the processors
19 are requiring farmers to use seeds that don't have an organic
20 version.

21 So, like, as a trade association, how do you see your
22 role in trying to, like, improve processor behavior in terms of
23 making, like, a higher quality supply chain? Thank you. I'd
24 love to hear what you had to say on either or both of those.

25 MR. RICE: Just a few things in there. Thank you. I

1 think you're right. We are in a unique position, and that's
2 where I think we see this idea of a regulatory guideline
3 program really serving that conversation and bringing all of
4 the concerned parties to the table where maybe some other
5 avenues are not as easy. For instance, a direct conversation
6 of those folks with their certifier is there's some hesitancy
7 there where a producer may, you know, feel exposed or they'd
8 say the wrong thing to get them in trouble or and certifiers,
9 of course, can't consult. So, absolutely, we see a lot of
10 potential for this idea that we're working on and other ideas
11 as they come from it. So, thank you.

12 CHAIR SMITH: Okay. Thanks, Scott.

13 MR. RICE: Thanks to everybody.

14 CHAIR SMITH: Charles Benbrook.

15 MR. BENBROOK: Hello. Thank you. Chuck Benbrook. I
16 work through my consulting company, Benbrook Consulting
17 Services, and I'm here today on behalf of the Org Tracker team.
18 Org Tracker is a new system we're building to hopefully bring
19 together and compile the residue data that certifiers are doing
20 under the NOP rule and running that data through the Dietary
21 Risk Index system, which I've built over my career, to be able
22 to provide back to the certifiers, to the NOP, to food
23 companies, detailed information about where the real risks are
24 in the food supply, not just the organic food supply, but the
25 conventional food supply.

1 The power that we have now analytically to understand
2 where the risks are, where they're coming from, how they were
3 grown is -- it's really moved a long way in the last few years.
4 My team has done the analytical work supporting the last five
5 Consumer Reports cover stories going back to 1999, including
6 the most recent one for the Consumer Report story that came out
7 just a couple of weeks ago. We generated over 60,000 pages of
8 tables, very detailed tables, ranking risks in different foods,
9 different pesticides.

10 We now can literally rank all of the residues found
11 by the USDA's PDP program in a year from the highest risk, so
12 this will be bifenthrin in broccoli or glyphosate in corn, from
13 the highest risk sample to the lowest risk sample. And the
14 span of dietary risk is about 10,000-fold now.

15 And what this new analytical ability has really
16 driven home to me and other people that have -- are using it is
17 how important it is to focus on the very few high risk samples
18 that are in the food supply. We know what foods they are, we
19 know where they're grown, and we know what pesticides are being
20 used. And we've calculated that if we could target the 1
21 percent of crops in the United States contributing most
22 significantly to pesticide dietary risk, we could get rid of 90
23 percent of the risk in the food supply. And as we put out data
24 and information to the public, to regulators, to food
25 companies, and convince people that this is possible, we're

1 hoping that people say, you know, that kind of seems like a
2 good idea. You know, why not?

3 In terms of the policies that NOSB and NOP are
4 facing, with Cathleen Merrigan and Brian Baker, Mark Lipson,
5 and myself, we've done detailed written comments in several
6 rulemakings and for this meeting about suggestions on how to
7 move forward on inerts, which I think is doable now. I think
8 there's kind of a consensus building around an approach. And
9 we're going to do whatever we can to help that as it moves
10 along. Thank you.

11 CHAIR SMITH: Nate, please go ahead.

12 SECRETARY LEWIS: Hi, Chuck. You mentioned that
13 you're gathering results from certifiers as part of their
14 periodic residue sampling, which is a obligation that
15 certifiers have to the public as part of the 7 C.F.R. at 270 --
16 at 670. Can you tell me if you've had -- tell me your
17 experience on getting those results. And since we are working
18 on a residue sampling topic right now, whether we could suggest
19 guidance around how those results are made available to the
20 public to more, you know, to expedite that or make it -- you
21 know, I acknowledge there's a number of concerns related to
22 exposing ongoing investigations and all those sorts of things.
23 But if you could share experience and suggestions in your
24 interactions with certifiers, that'd be great.

25 MR. BENBROOK: Well, so we've -- the idea came up

1 actually two or three years ago to do this, but it's taken some
2 time to raise some money and to be able to do it. We are
3 building the system now. We're going to, probably in just the
4 next two or three months, do the first analytical work with
5 certifier data. We haven't found a certifier yet that we've
6 talked to who has said, no, we're not going to work with you.

7 What -- we're a bunch of pesticide junkies. This is
8 what I've done for 35 years. The organic community, the USDA,
9 the American public can get a hell of a lot more bang for the
10 buck out of the money being spent on residue testing under the
11 NOP rule. And we want to make that possible. We want to show
12 people how that can be done.

13 And I just, you know, I love Phil's comments. I got
14 into this game in 1980. And back then, the reason consumers
15 came to the organic marketplace was to reduce pesticide dietary
16 risks. And as far as I know, that's what most new consumers
17 for organic cite now as their major reason. And it seems to me
18 that driving home the significant public health benefits that
19 are associated with eating organic food and particularly fruits
20 and vegetables. That's where most of the pesticide dietary
21 risk is coming from. There's a hell of a story. And it has
22 frankly not been a priority for the U.S. government to share
23 with the American public how much safer organic food is for
24 you, especially if you're a young family having children and
25 raising kids. It's a no-brainer to feed young children organic

1 food. Why are we not doing it? It's a real policy failure.

2 And I do want to share, I follow the science on
3 pesticides and public health very closely. Things are moving
4 very fast now. There are new scientific tools that are linking
5 contemporary levels of exposure to pesticides in food to
6 adverse health outcomes. And, you know, the interest of the
7 consuming public in how organic affects pesticide dietary risk
8 is only going to grow. I'm quite sure of that.

9 CHAIR SMITH: Allison, please go ahead.

10 BOARD MEMBER JOHNSON: Thank you so much for being
11 here, Chuck. For those in the room and online listening who
12 don't know Chuck's work, we have a lot to be thankful to you
13 for anyone who cares about pesticide issues. We've all really
14 benefited from your dedication and work over the years. So
15 thank you.

16 I have two questions for you. The first one, you
17 know, my mind jumps back to the transition presentations that
18 we heard this morning. So it sounds like you're saying we have
19 pretty good accessible tools now for identifying foods that are
20 high-risk for high levels of dietary pesticide exposure.

21 MR. BENBROOK: Yes, we do.

22 BOARD MEMBER JOHNSON: Do you think there's a
23 relatively easy path then to try to link up that information
24 annually or every so often with our transition efforts so we
25 could be focusing on the highest risk crops to transition to

1 organic?

2 MR. BENBROOK: Absolutely. One thing to understand,
3 we get PDP data two years after it's collected. So we just got
4 the 2022 data in February just in time to build it into our --
5 the analysis that was in the Consumer Reports story that came
6 out two weeks ago. But certifiers, you're out there, you're
7 testing samples, sometimes tissues, whatever, and getting
8 results much closer to when that food is going to go to the
9 consumer. And that makes it possible to have an early
10 response.

11 For example, the -- one of the scary samples that
12 showed up in the 2022 PDP was an organic green bean from Mexico
13 with like the third highest level of methamidophos of any of
14 the green beans tested. I mean, this organic sample from
15 Mexico was like the 13th riskiest sample of all of the PDP
16 crops in 2022. Obviously, not only a conventional crop, but
17 one where they really poured the methamidophos on the green
18 beans, which is illegal in the U.S., but it doesn't get picked
19 up. But yeah, we have really remarkable ability to -- for the
20 crops that get tested by the residue testing programs. And as
21 I said, you know, it -- most of the risk is in fruits and
22 vegetables and juices and purees and frozen and canned, et
23 cetera.

24 But there's some other areas that are increasing.
25 Herbicide residues and risks are definitely increasing and are

1 a big problem. But we're going to do everything we can to
2 bring these new tools and insights to the entire organic
3 community and definitely to the consumers because at the end of
4 the day, when consumers start demanding organic fruits and
5 vegetables, that's the way it's going to, you know, that the
6 farmer's going to benefit, the land, and so on.

7 CHAIR SMITH: Amy, please go ahead.

8 BOARD MEMBER JOHNSON: Oh, sorry. Yep. If you
9 could, Amy, come back to me.

10 CHAIR SMITH: No, just go.

11 VICE-CHAIR BRUCH: Go ahead, Allison.

12 BOARD MEMBER JOHNSON: Thank you. So the follow-up
13 question is, you know, I agree with you that consumers are
14 primarily or predominantly driven by their own personal risk
15 from eating food. But we all know that the environmental risk
16 of pesticides is an extremely pervasive threat for farming
17 communities, to our environment, to our pollinators. And I'm
18 curious if there's an analogous data set or another way to
19 identify top risks in the environment that could also help us
20 target efforts.

21 MR. BENBROOK: The -- obviously, there are so many
22 components in the environment. All of the, you know, organisms
23 that live up and down the tree of life, they live in different
24 habitats. So the circumstances and degree to which pest
25 management systems and pesticide use adversely affects the

1 environment and the critters that live in environments, it's
2 super complicated and very place-based. So it's hard to, at a
3 national policy level or even a state policy level, to have --
4 to conceive of a coherent way to go about tackling it.

5 But I'll tell you, this country is way too reliant on
6 herbicides. There -- does the average person in this room know
7 that the average American is peeing out about six herbicides a
8 day, year round? You know, and if you take all pesticides,
9 including the neonics and the triazines, it's probably eight to
10 10 pesticides are leaving our body every day.

11 And sure, the levels are low. And fortunately, they
12 are not damaging our DNA so much that, for example, we can't
13 reproduce anymore. That would kind of suck, wouldn't it?

14 But it's just, on the environment, it's just too much
15 reliance on the chemical toolbox and not enough reliance on
16 other things. You know, the biggest thing that could happen,
17 you know, is to get a third crop into the Midwest. You know,
18 until that happens, no really meaningful change is going to be
19 possible in a corn/soybean system. It's just not possible.
20 You know, people have been saying that for 50 years, and it's
21 as true today as it was back then.

22 CHAIR SMITH: Okay. I have quite the list. Please
23 be succinct. We are running over time, and we have a reception
24 to get to, folks. So let's not forget our priorities here.
25 Just kidding.

1 Amy, please go ahead.

2 VICE-CHAIR BRUCH: Yeah, Kyla, thank you. Chuck,
3 thank you for being with us today and lending all your talents
4 to this important area of testing. It's something that we need
5 to dive in further.

6 I was just hoping you could comment on the innovation
7 that could potentially happen in the private sector for speed
8 of results. So when folks are sending these lab samples in,
9 you know, we're waiting a week, 10 days at a time, to
10 understand what's going on. Is there any innovation happening
11 in the private sector to accelerate that information exchange?
12 I know at least one data point I have in soil sampling, there's
13 a company that has a probe that you insert in the ground and
14 you can get the instantaneous macro/micro data of your soil.
15 So I didn't know if that sort of philosophy is happening in the
16 testing space.

17 MR. BENBROOK: So, I didn't think there's been near
18 as much interest in the private sector among, you know, venture
19 capitalists in investing in better pesticide residue testing
20 and understanding where the risks are. It's just a -- it's an
21 orphan area. I mean, just think of it.

22 I mean, why was it left to me and my colleagues over
23 the last 35 years to build this tool? Why didn't Google or
24 Amazon or one of the other information technology firms do
25 this? They have the experts. They have the hardware. It's

1 just -- there just isn't the interest in it. So, and that's
2 why we can progress so fast if we actually start to use the
3 capabilities that are now available to us.

4 And for the organic community, you've got to show
5 that you're using this residue data to deal with problems in
6 real time. So yes, then it becomes very important that you
7 have solid chain of command of information and rapid
8 communication of information to the people that are able to act
9 upon it in a constructive way. And I have some ideas to share
10 down the road with everyone on that front.

11 CHAIR SMITH: Brian, please go ahead.

12 VICE-CHAIR BRUCH: Thank you.

13 BOARD MEMBER CALDWELL: Yeah, thanks, Chuck. I just
14 wanted to add my voice to the appreciation for the work that
15 you and Dr. Baker and Dr. Merrigan have done over the years.
16 Really fantastic stuff.

17 We've got this focus right now on residue testing for
18 imports, to try to arrest fraud. And I don't want all this
19 amazing stuff that you're talking about right now to kind of
20 get lost in that shuffle. So I would encourage, if possible,
21 for you to maybe make some targeted comments about that,
22 because I'm sure your expertise would help with that.

23 You know, I'm thinking of, you know, glyphosate
24 residue, whatever. I'm sure you know way more about it than I
25 do. But also, over the long run, to just keep on, and I -- I'm

1 sure you will. But I just wanted to say, we really need you to
2 keep on giving us this message, because we'll have more
3 bandwidth for all the implications of what you're saying, you
4 know, in future meetings as well. So thanks. Thanks again so
5 much.

6 MR. BENBROOK: Thank you. You know, I felt for a
7 long time that the one thing that could really rapidly grow the
8 organic industry, and again, mostly in fruits and vegetables,
9 because that's where the dietary risk is, you know, is getting
10 the government out of the way, frankly, of the marketplace.
11 The reason that the American consumer and consumers around the
12 world don't understand how much healthier organic food is, it's
13 government policy. It's -- that's what's holding it back.

14 And I'm using government data to do my analyses, but
15 the government doesn't want to go there, because there's too
16 many powerful forces in the food system that don't want to look
17 under this rock. And they've been successful in sort of
18 keeping pesticides out of certification programs.

19 And, you know, there really hasn't been much positive
20 change in the pesticide use and risk arena, because of the
21 clout of agricultural commodity groups with the agribusiness
22 groups. But the dam's going to break. The dam is going to
23 break, because there's a lot of people that their families have
24 experienced adverse health outcomes, that science is beginning
25 to tie back to typical levels of exposure in, you know, in food

1 and in water. So I -- I'm hopeful that I can stick around long
2 enough to really begin to see the change.

3 But, you know, I'm going to challenge the, you know,
4 the people in USDA, FDA, EPA, you know, to stop being afraid to
5 say that organic is such a better way to grow food. It's
6 safer. In Washington State, where I live, 80 percent of the
7 true food industry could go organic in five years. There's
8 nothing holding it back except market demand. Everybody agrees
9 with that. So why is there no -- why isn't the market demand
10 there?

11 People don't understand the difference, because every
12 time, you know, somebody publishes a paper or the government
13 tries to do something, there's this onslaught of PR from the
14 conventional industry that just drowns everything out. And,
15 you know, it's -- they're very good at it. And until we find a
16 way to make our voice pierce through that cloud, it's going to
17 be an uphill struggle.

18 CHAIR SMITH: Jerry?

19 BOARD MEMBER D'AMORE: You've intimidated me in
20 asking me to be brief. I'll bet that the term, if you don't
21 measure it, you can't manage it, means a lot to you.

22 MR. BENBROOK: Yes, sir.

23 BOARD MEMBER D'AMORE: Okay. And listening to you,
24 there's a lot of, in my mind, very exciting things that you've
25 touched. And my question will be is, where do you begin taking

1 your measurements?

2 The reason for the question is, I'm wondering at what
3 point you're going to actually get to predictive analysis as to
4 what's going to happen rather than waiting for someone to say,
5 what do we have here? Does that make sense to you?

6 MR. BENBROOK: Sure, yeah.

7 BOARD MEMBER D'AMORE: And then, so, and then the
8 next step for me and another passion of mine and many members
9 of this board, I think you've got a golden opportunity to
10 address food waste in this thing, too. Thank you.

11 MR. BENBROOK: So, all of you know that, you know, in
12 1996, Congress passed the Food Quality Protection Act, huge new
13 law, strong new powers for EPA, targeting the OPs and
14 carbonates, which were the developmental neurotoxin
15 insecticides that people were concerned about back then. And
16 if you look at what has happened, is the highest risk OPs and
17 carbs, starting with methyl parathion, were driven off the
18 market, but then farmers just went down the line to the next
19 one and the next one and the next one.

20 And in this recent analysis that we did, OPs and
21 carbs are still the risk drivers. It's just different ones.
22 And so we -- we've, in the pest management and pesticide risk
23 arena, we've got to use the insights that this data provides to
24 us. I mean, I can just show you some profound failures in the
25 current policies. Things that we all have grown up believing

1 are true, that simply aren't true anymore. And so somehow
2 we've got to find a way to get this information out and have,
3 you know, practical solutions to move forward. And, you know,
4 I think the organic community needs to take care of business in
5 its backyard first. And I see some real opportunities. I
6 think Org Tracker, as it gains functionality, it's really going
7 to make it clear where your issues are. And that should help
8 target corrective actions to deal with them.

9 CHAIR SMITH: Okay. Franklin, last question.

10 BOARD MEMBER QUARCOO: All right. I want to go in a
11 slightly different direction. Does the consumer also play a
12 role in all of this? Because this demand for blemish-free
13 fruits and vegetables puts a lot of pressure on farmers. So I
14 know that the consumer is seen as a victim, but does the
15 consumer also bear part of the responsibility? Because that
16 much pressure on a farmer to grow a fruit or vegetable in an
17 area that has high pest incidence, and yet you are expecting
18 blemish-free. A tiny hole on that fruit or vegetable, that's
19 unacceptable. But if it's completely clean and looking, but
20 heavily loaded, then we buy. So is the consumer also part of
21 the problem?

22 MR. BENBROOK: Sure. And processes are part of the
23 solution because there are other ways to use fresh fruits and
24 vegetables that aren't going to make the grade to be sold, you
25 know, fresh. So it's a super complicated challenge that's

1 obviously been on the table for my entire career and it will
2 remain on the table. So I think it's something that we've just
3 got to keep plugging away at.

4 But you kind of have to feel sorry about consumers.
5 I mean, look at what they're being barraged with. PFOS and
6 microplastics and so many other things that they're reading
7 about on a day-to-day basis. It has to be hard for a lot of
8 people to kind of keep track of what really matters. And
9 that's just -- that's a byproduct of this information overload
10 that we have. And the fact that so many interests have found
11 ways to, through social media and other mechanisms, to kind of,
12 just to be really blunt, pollute the information space that's
13 out there with a lot of misinformation.

14 Kyla, I've taken enough time.

15 CHAIR SMITH: Yeah, thanks so much, Chuck. We are
16 taking a short break. 4:40, that's eight minutes. Move quick,
17 people. Up next, we have Steve Ela and then John Foster.

18 BREAK

19 PUBLIC COMMENTS, CONTINUED

20 CHAIR SMITH: Take your seats, please.

21 Okay, Steve. Don't forget to state your name and
22 affiliation.

23 MR. ELA: Good afternoon. I am Steve Ela and I'm
24 both an organic fruit grower. Since 1996, I've worked with the
25 National Organic Coalition as their NOSB specialist and

1 occasionally I've been known to be on the other side of this
2 fence.

3 So, today I would like to speak to the discussion
4 documents on compost and inert ingredients and organic
5 pesticides. And I might also like a discussion with Dr. Tucker
6 on how you use trademarks to enforce protection of nock-nock
7 jokes.

8 The NOSB is the deliverable body that determines the
9 standards we use and protects the integrity of the organic
10 seal. Sometimes we have to step back from an immediate action
11 and decision at hand and think about some of the overarching
12 principles of organic production: farming as an ecosystem,
13 protecting health, which includes me, my family, our farm
14 workers and consumers, minimizing synthetic inputs and farming
15 in a way that protects the environment for the future. I ask
16 you to do the same with your discussions at this meeting.

17 A big picture view is particularly needed as we
18 discuss the proposed revisions to the compost standards. While
19 on the one hand, allowing these synthetic compostable materials
20 seems to be an environmental step and a closing of the loop on
21 our food delivery system, but a deeper dive and a step further
22 back shows that this intentional allowance of synthetic
23 materials, when we can easily make compost without them, would
24 actually provide yet another avenue for contamination of
25 organic land. These synthetics are not necessary for organic

1 production.

2 The actual ASTM standards for compostability are not
3 100 percent. And we heard earlier about all these standards.
4 They only note that waste must disintegrate, not degrade, so
5 that 90 percent of the material can pass through a two
6 millimeter sieve. These synthetic materials may not completely
7 be broken down, but just reduced in size. And furthermore,
8 biodegradability standards are also not 100 percent. It is
9 easy to cite and feel good about ASTM standards without
10 acknowledging that they do not guarantee complete
11 compostability or biodegradability.

12 Secondly, these synthetic compostable materials
13 contain plastics, which degrade into micro and nanoplastics.
14 We're rapidly learning about the negative impacts of micro and
15 nanoplastics and their serious implications for human health,
16 as well as adverse impacts on plant microbial communities are
17 documented in our written comments. Allowing the intentional
18 addition of these synthetic materials to organic land would be
19 a grave mistake, and I haven't even mentioned the PFOS issue.

20 On a different note, NOC urges the board to list the
21 inert ingredients in organic pesticides individually on the
22 National List. We've talked about this in our written
23 comments, and we've talked about it before. We've outlined a
24 stepwise approach that can accomplish these goals.

25 And finally, I want to thank you for allowing these

1 in-person oral comments. While I can say more, if we can
2 continue to develop and encourage local and regional people to
3 give you face-to-face comments about where we are meeting, I
4 will gladly yield my spot here in doing virtual comments. And
5 I would also say the humor is absolutely priceless.

6 Kyla, would you honor me with a nock-nock joke?

7 Nock-nock.

8 CHAIR SMITH: Who's there?

9 MR. ELA: Sell.

10 CHAIR SMITH: Sell who?

11 MR. ELA: Celery. And while I bet you thought I was
12 going to talk about celery powder, we urge you not to allow the
13 crop's petitioner to sell rye pollen extracts. They're not
14 organically grown.

15 BOARD MEMBER D'AMORE: That was some heavy lifting,
16 Fred.

17 CHAIR SMITH: Okay.

18 MR. ELA: Oops.

19 CHAIR SMITH: Nate, then Allison, then Mindee.

20 SECRETARY LEWIS: I'd say don't quit your day job.

21 No, I read in your in NOC's comments about the compostable
22 plastics, a big focus on not wanting to, you know, organic to
23 support a single-use reality, single-use plastics concept. Did
24 the -- did your members weigh the potential benefits of
25 allowing in a very narrow use pattern of compostables, i.e.

1 fruit stickers and plastic liners? Did you sort of
2 differentiate those uses in your conversations?

3 MR. ELA: I think the bottom line is we know there
4 are the unintentional components, but this is intentional, and
5 this is an intentional addition and allowance for synthetic,
6 and that is a very big difference. And I would also say it
7 kind of comes back. You know, we talk about closing the loop,
8 but it depends on an ecosystem analysis of what loop are you
9 closing? Our real problem is single-use plastics. And, you
10 know, getting rid of those single-use plastics would be a much
11 better solution than saying, how do we get rid of these because
12 we've created a problem, how do we get rid of it?

13 The other thing I would say is, you know, we've
14 talked about cost. Well, who's paying the cost? If we're
15 talking about PFOS and like the state of Maine going back and
16 suing PFOS manufacturers for the cost, why aren't we having the
17 manufacturers of these materials pay the cost of figuring out
18 how to dispose of them, rather than having us as organic
19 farmers or consumers pay that cost? So I think we need to step
20 back and say, whoa, we should not add things that can
21 intentionally contaminate organic ground. And the PFOS stuff
22 with biosolids, I mean, you know, we can go back to
23 conventional UDT and all these things are so many instances.
24 Don't create an avenue that just exposes us to the future. And
25 that's the precautionary principle.

1 CHAIR SMITH: Allison, please go ahead.

2 BOARD MEMBER JOHNSON: Thanks for your comment,
3 Steve. In NOC's written comments, there was a section on the
4 nutrient vitamins and minerals listing and the request to
5 delist it because of concerns about allowing in materials that
6 shouldn't be coming in. I wondered if you have any specifics
7 that you could share that are of particular concern.

8 MR. ELA: You know, I can't list, you know, vitamin
9 X. That's -- yeah, I don't have that experience and we don't
10 have time to take that deep enough dive. But it is the same
11 problem with any of our listings that are groups. And I think
12 the big concern of NOC members is that there were, within that
13 listing, there were vitamins and minerals that have been
14 reviewed that may or may not be allowed at this point within
15 that group listing, that if they were reviewed individually
16 probably would not be allowed. And then it comes back to is it
17 essential? And the essentiality, is it required by FDA? Or is
18 it part of a healthy diet? And so, you know, what is
19 absolutely necessary and keeping synthetics at the minimum that
20 we can.

21 CHAIR SMITH: Mindee, please go ahead.

22 BOARD MEMBER JEFFERY: Thanks, Steve. I was
23 wondering if you could step back in time and be the farmer who
24 was the board chair who hung out and talked to this retailer
25 about carbon-to-nitrogen ratios and the nitrogen role at

1 length. Thank you for that. Because I'm thinking about the
2 time, you know, considering the three-to-one implication and
3 considering the no more than 20 percent of a crop nutrients and
4 we're looking at crop systems and we're thinking about systems
5 approach to growing crops. And then we're come forward in time
6 and we're looking at compost now and we're asking questions
7 about carbon-to-nitrogen ratios.

8 I'm just a little worried about future innovation
9 coming up with some really amazing, you know, biological
10 breakdown of products that result in some inputs that we might
11 find questionable again, much like we had the debate about the
12 ammonia extract. And I just wanted to hear your thoughts on
13 whether you think the -- because we heard in public comments
14 that a lot of composters see the carbon-to-nitrogen ratio as a
15 best management practice and not necessarily like a
16 requirement. And so in that world, do we have consistency
17 problems? Do we need guardrails? Is there a lowest amount
18 carbon-to-nitrogen ratio that sort of sets us in that and any
19 amount of responding to that you want to do?

20 MR. ELA: Yeah, that's a tough one. I mean, I think
21 they -- those standards have benefits. Where the exact line is
22 drawn, you know, you can argue. And I think it's like with
23 organic, you know, what's organic, what's not. You finally
24 make a line and say, no, this is the line and you can argue on
25 both sides, but you draw a line.

1 But I don't think having no standards around that
2 would be a good idea. And just for the reasons you said.
3 Compost was -- has been part of a soil building program and he
4 wanted to have a carbon-to-nitrogen ratio that is going to
5 build soils and not just be a fertilizer source. And in fact,
6 you know, for the most part, compost is not usually a great
7 fertilizer source in terms of nitrogen. So I'd rather see it
8 as being part of a soil building process and have the seed and
9 ratio be at a level where that is guaranteed.

10 And with the nitrogen stuff, we went after the
11 most -- the worst, most hot materials. But even above three-
12 to-one, they're still pretty hot materials, but that just was a
13 natural break point between kind of mineral nitrogen and
14 protein nitrogen. And I think compost, there's probably some
15 break point there too.

16 BOARD MEMBER JEFFERY: So just so I'm clear, you're
17 not saying a number, but you are saying guardrails might be
18 good.

19 MR. ELA: I think guardrails would be excellent,
20 yeah. And I think those are there for a reason for, you know,
21 various breakdown products and things. So, I haven't had time
22 to review the science on that so I'm not the expert. I think
23 there are many other people that are, but I think a guardrail
24 is needed there.

25 CHAIR SMITH: Thanks, Steve.

1 MR. ELA: Thank you. Good luck.

2 CHAIR SMITH: Up next, we have John Foster, followed
3 by Harriet Behar, and then Albert Strauss.

4 MR. FOSTER: Boy, talk about a hard act to follow,
5 Steve. I'm not even going to try like any of those jokes. I
6 have a day job. I'm really happy in it. I'm going to stay
7 there.

8 I've been advised to give a fairly long introduction
9 here because I have a lot of affiliations that are relevant
10 here. So I'm John Foster. I'm the Chief Operating Officer of
11 Wolf and Associates. We're a consulting company focused only
12 on the organic space. A former NOSB member 2010 to 2015. For
13 those observers, that was the -- those were the raucous years.

14 I am -- we assisted with the meloxicam petition.
15 That was really important to get out there, on the record
16 there. And then I'm also on the Board of Directors of the
17 Organic Seed Alliance. So all of those things have some
18 relevance in what I'm -- I wanted to be -- have my full
19 disclosure here.

20 Okay. So everything that we're really about is
21 getting more organic acres in place. Just facilitate organic
22 acreage, you know, please. That's the -- that's our main kind
23 of focus here. So all of these things ultimately are directed
24 at that intended outcome.

25 So we provided quite a few written comments. I'm not

1 going to go over those. I'm here, but I certainly can answer
2 questions about any of those. Please let the list -- the
3 National List be inclusive, supportive, and accommodating. I
4 think -- I believe that was the intention. We should keep
5 pushing that direction.

6 I'm going to talk more at length about commercial
7 availability. I believe it could be applied more usefully to
8 205-605 materials. I am still being a harp on this idea. It's
9 probably 10 years out, but I'm going to start it now. I really
10 do believe there's a need for commercial availability registry
11 for all materials, for consistency and growth purposes.

12 And then I heard someone ask about how SOE is going.
13 We're in a pretty unique position because we do see operations
14 all around the world, all kinds of handlers, all kinds of
15 farms, all kinds of livestock. So we probably have a view to
16 about probably a dozen certifiers and how they're coping with
17 SOE. So happy to answer any questions about how that's going
18 because we've helped a lot now.

19 So, this -- I think -- I've spoken on this before, so
20 I won't go into detail. But the regulatory precedent for
21 commercial availability is pretty solid. I think there's more
22 opportunity for everyone to benefit from that. It does provide
23 market incentives. Sorry, I've been reading a lot today. It
24 provides demonstrable market incentives that I think we can
25 push a lot of systems forward with if we continue. R&D is

1 certainly ready to apply some pretty novel methods that have
2 come around in the last 10 years, especially, to move materials
3 that have always been considered to be non-agricultural or even
4 synthetic, toward an organic source, in the future. We heard a
5 little bit about that earlier.

6 Reviewing lack of commercial availability
7 documentation is something that certifiers are really used to.
8 And I hate to lump more on certifiers. I know they have a lot
9 of pressures on them. Sorry, Kyla and friends. But at least
10 it's a familiar. It's only half step from the familiar, right?
11 We don't have to go too far to add a little bit more. And
12 increased demand for organic ingredients clearly creates demand
13 for more organic crops.

14 This registry idea has been tried and failed at least
15 three times that I know of when it's been managed in a private
16 setting. I feel like the only way to get full disclosure
17 that's useful is from certification and the information
18 gathering ability that certifiers have, aggregated and
19 consolidated in a source that's going to have a consistent and
20 longstanding presence in the community. I think that's a
21 public source. I'll leave it there for now.

22 CHAIR SMITH: Go ahead, Nate.

23 SECRETARY LEWIS: So in handling citric acid as a
24 material I'm doing for one of the materials I'm doing sunset
25 and we asked some questions related to the value of a

1 commercial availability on that particular substance. And I
2 think what I -- and I think the response from stakeholders was
3 mixed. It wasn't resounding one way or the other.

4 So I think my question's related to your opinion
5 around whether these commercial availability clauses should be
6 added via petition when the industry is ready for it and asking
7 for it or via the board's normal sunset process. And this is
8 sort of absent overarching rulemaking where you're adding it to
9 everything on 605. What's the -- you know, I guess I'm
10 struggling to make the case when the community is mixed and we
11 don't have this petition which sort of establishes a process
12 for need.

13 MR. FOSTER: I think it should be a petition process.
14 Like even like 10 years or 15 years ago that was one of my
15 hallmarks was like we have a process. We should use it. Like
16 let's use the petition process.

17 I'm not a big fan of doing anything in sunset. You
18 could also call it renewal review process. Except that. I
19 think that's the smarter way to go. So yes, petition process.

20 Citric acid particularly, that's something I have a
21 fair amount of experience with and the availability of it. I
22 remember the comment last week was made that there's not much
23 out there. I don't think that that's a reason not to move
24 forward asking for it. That -- the Maine company I know of
25 that makes both liquid and a dry formulation doesn't make it

1 until it's ordered. They're not going to have it just sitting
2 around because the volume isn't there. It's just like a retail
3 store wouldn't buy, you know, kumquats on kind of hoping people
4 buy kumquats. They buy it because there's some kind of
5 indication of demand. And that indication of demand, it takes
6 incentive. When the market isn't providing that adequate
7 incentive, that's where regulation could step in. Could, not
8 always, but could step in and provide that incentive.

9 That commercial availability clause isn't there to
10 just signal like, oh, we have this opportunity, but if no one's
11 taking the opportunity, clearly it's not working. So, yeah, I
12 would say yes to a petition process and yes to pushing it a
13 little, nudging it a little bit. Kind of falling back away
14 from just throw commercial availability at everything on 605,
15 like I said, I think in Sacramento probably.

16 I think it does need to be more targeted so a
17 petition becomes much more realistic at that point. Does that
18 help?

19 CHAIR SMITH: Logan, please go ahead.

20 BOARD MEMBER PETREY: Thank you. I'm sorry. I'm
21 actually on my porch and there are so many gnats. I'm getting
22 bit.

23 Hi, John.

24 MR. FOSTER: Hi, good to see you.

25 BOARD MEMBER PETREY: So I wanted to go through your

1 comments, the written comments. Mr. Will said that you might
2 be a better source for this.

3 Going to the CO2 comment that you had and stating
4 that you were in favor of adding it to the National List, just
5 wondering if you could talk on that.

6 MR. FOSTER: Sure.

7 BOARD MEMBER PETREY: And more in particular, is, you
8 know, carbon dioxide, I understand is super vital to, you know,
9 plant photosynthesis. We understand. We just -- organic
10 greenhouse producers are popular. I would think that it's
11 popular. I would think that they've been in it for a while.
12 This isn't kind of a new way of farming, not just because, you
13 know, for the finished raw product, but also for nursery
14 plants.

15 So it's very popular and I just expected more
16 support, you know, more of the community coming out and saying,
17 yes, we need this product for it to be that essential. That's
18 what I was expecting. And it doesn't come. We've had two or
19 three groups saying that it would be beneficial, but we just
20 haven't had that flood of, you know, comments that I would
21 expect if it was, you know, so necessary for the production of
22 these systems. That was -- that's really our stance.

23 And we had a comment from the FDA that mentioned, you
24 know, in the oral comment saying that it was really necessary,
25 it was really needed. And anyway, so we're scheduled to vote

1 on it, you know, at this meeting and I just -- I'm just needing
2 some more clarity, you know, as how important, you know, is
3 this product?

4 MR. FOSTER: I think it suffers this -- that relative
5 dearth of support from it comes from the same source that
6 anything that isn't on the list suffers from. Which is if
7 organic producers don't have it on the list, they're not using
8 it. So it's hard to motivate people, enough people, which is,
9 in the greenhouse community, is a tiny subset of total growers.
10 So you're starting with a small number anyway.

11 So I think there's a number who just aren't in the
12 loop of it. I don't know -- I can't -- I don't know, but I
13 can't speak to how many -- for how many greenhouse producers
14 would that make a yield difference substantial enough to turn
15 their operation organic. I don't know that. But it stands to
16 reason that is a limiting factor. Like every limiting factor
17 when you're growing things, until you solve that problem,
18 there's no point in going the next step, generally speaking.

19 So I don't know why, other than small numbers, I
20 don't know why there wouldn't be more support for it. But I do
21 know from direct experience, is that for a few growers who are
22 either aspirationally organic or organic now and struggling,
23 100 or 200 or 300 ppm increase in concentration could boost
24 yields a few percentage points. And that's -- that could be
25 enough to make a difference in a particular year. But there's

1 not many of those out there. That's a really small number. So
2 I wouldn't, and then if you cut that by the number of growers
3 who have the time to put everything else aside and make public
4 comment, it's an even smaller number.

5 I know from -- I used to teach horticulture at a
6 college, and I know it made a really big difference,
7 particularly in seedling production. And it got our seedlings
8 out of the greenhouse a few days faster. Something like celery
9 that's in there a little bit longer, maybe two or three days,
10 maybe four days faster. Something like broccoli or kale, maybe
11 a day faster. And it got them out of that growing environment
12 faster. So that's useful from a throughput standpoint. It's
13 also useful from a pest management standpoint, which is great
14 at growing seedlings, but it's also great at growing fungus
15 gnats and aphids and a number of other pests. So the sooner
16 you can get it out there, the better.

17 BOARD MEMBER PETREY: Thank you.

18 MR. FOSTER: Sure.

19 CHAIR SMITH: Thanks, John. Appreciate it.

20 MR. FOSTER: You're welcome.

21 CHAIR SMITH: Up next, we have Harriet Behar,
22 followed by Albert Strauss, and then James Syburg.

23 MS. BEHAR: My name is Harriet Behar, and I'm the
24 farmer services consultant with the Organic Farmers
25 Association. My vegetable, herb, and poultry farm has been

1 certified organic since 1989.

2 During the public comment webinars, farmers, buyers,
3 and processors all spoke to the dire situation for domestic
4 organic grain producers. Jenny's extensive overview of SOE was
5 very encouraging with a robust rollout and a strong commitment.
6 But U.S. farmers need oversight before those imported ships
7 leave their ports and at our own ports of entry, including
8 overland shipments from Canada and Mexico.

9 OFA asked the NOSB to show support for our domestic
10 producers with a resolution to the NOP, asking for a speedy
11 expansion of the residue testing pilot program to a much larger
12 program. We are playing a game of whack-a-mole. When we stop
13 one source of fraudulent grain, a different one appears. We
14 need stronger enforcement to lessen this overwhelming flow of
15 questionable organic products. Also, a special imported grain
16 hotline should be implemented and promoted by the NOP, offering
17 a place for fraud concerns, broker activities denying entry,
18 and for those finding issues once they receive product to
19 report their findings so we can gain more data.

20 Inerts. The National Organic Coalition has a
21 workable proposal for dealing with this long, unresolved issue.
22 With the changes coming to the NOSB next year, it is imperative
23 that this board come forward with a final proposal that
24 addresses both the mandate and the board review of all
25 synthetics used in organic production and provides a way

1 forward to allow for future innovation in formulations and
2 provide certainty for those using the current inerts.

3 Use of organic seeds. In the EU, each country has
4 developed a list of specific seed varieties that are available
5 as organic. If an organic grower does not use these organic
6 varieties, they cannot sell that crop as organic. OFA asked
7 the NOP to work with the NOP to either have the NOP do the
8 research and fund, or fund an outside organization to develop a
9 list of equivalent varieties so we can then require organic
10 seed when it is available. The stagnant nature of organic seed
11 purchases in the U.S. affects the availability of organic seed.
12 Seed breeders will not continue to innovate and produce organic
13 seed varieties when there are warehouses full of unsold organic
14 seed. The lack of transparency in gene-edited seed also makes
15 the use of organic seed even more important.

16 And lastly, compost. The current definition produces
17 high quality compost without the risk of unwanted and dangerous
18 synthetics. High nitrogen compost is immature compost since
19 nitrogen tends to leach easily. There is no reason to change
20 our current definition. Ta-da.

21 CHAIR SMITH: Thanks, Harriet.

22 MS. BEHAR: Any questions?

23 CHAIR SMITH: I think I have a question. So, about
24 the seeds and the list. That -- is that data, that OSA, is
25 that research and data something that OSA can provide? Because

1 I'm thinking about, you know, they're current. Now this, there
2 is a guide. ACA has a guidance document, right? And so maybe
3 as a first step, if there was this list, it could go there with
4 a -- as a guidance document so then certifiers would have
5 access to that and be able to like follow the non-compliance
6 practice.

7 Anyway, just brainstorming out loud. So if that was
8 something that could be brought to the ACA, maybe that's a path
9 forward.

10 MS. BEHAR: Yeah, that's a possibility. But I'm
11 actually kind of responding to a question that you -- someone
12 had during the public webinar where somebody said that Europe
13 is even behind us on the use of organic seed. But that is not
14 true. They are actually requiring use of organic seed, country
15 by country. I can send you the list. It's available on the
16 web. With, you know, France has a list. Germany has the list
17 of what's being required. So there's the force of law behind
18 it.

19 And I think people have been kind of skirting around
20 this commercial availability thing for a really long time and
21 ignoring that our rule doesn't say it has to be the exact
22 variety, but it has to be of equivalent variety. So if it's --
23 if it doesn't have a brand name that they're used to or their
24 cousin doesn't sell it, then they don't buy it. And so here
25 are these -- and as an organic inspector, many times I would

1 call out people on, you know, there is a corn that's available
2 and I would push them to trial it. And that was something also
3 that could be maybe required. And when I came back to that
4 farm two or three years later, they were happy with the organic
5 seed, but they had never tried it and they were afraid to make
6 that move.

7 CHAIR SMITH: Thanks, Harriet. You have a question
8 from Amy.

9 MS. BEHAR: Hi, Amy.

10 VICE-CHAIR BRUCH: Hi, Harriet. Thank you so much
11 for participating in our process today. I really appreciate it
12 and all your commitment to the organic industry.

13 I wanted to unpackage a little bit more. You're
14 talking about Europe and their requirements of organic seeds.
15 Do you know how they're handling folks that are certified to
16 the EU standard that are importing into the EU or exporting, I
17 guess, from their country into the EU? I'm just wondering,
18 from a -- I mean, we have -- we heard from seed dealers or seed
19 distributors during our public comments that organic seed, at
20 least for row crops, is probably available. But I'm just
21 concerned about the availability internationally of this seed.
22 So I didn't know how EU was handling, you know, that
23 requirement of folks outside of their country.

24 MS. BEHAR: As far as I know, they're only regulating
25 the growers within their country and then determining which

1 varieties are commercially available to those growers within
2 those countries. If you do look at the list, though, many of
3 the varieties are similar. Or exact, actually. Not similar.
4 So it's a lot of the same, but not always. Like, you know,
5 there were differences between the different countries.

6 VICE-CHAIR BRUCH: Great. Thanks, Harriet. And
7 thanks for your recommendations on the residue testing. Really
8 appreciate that, too.

9 CHAIR SMITH: Thanks, Harriet. Up next, we have
10 Albert Strauss, followed by James Syburg, and then Brian
11 Pontious.

12 MR. STRAUSS: Hi, my name is Albert Strauss. I'm
13 with Strauss Family Creamery in Northern California. And I
14 want to talk to you a little bit more about the state of the
15 organic dairy industry in our communities. My mother
16 started -- was a co-founder of the first Agricultural Land
17 Trust in the nation, Marin Agricultural Land Trust, has
18 preserved 58,000 of the 100,000 acres of agricultural land in
19 Marin County.

20 We became the first certified organic dairy and
21 creamery in the West Mississippi River, first 100 percent
22 organic creamery in the United States. And since then, we have
23 90 percent of our dairies in Marin-Sonoma County certified
24 organic. To come up with the organic rules and regulations,
25 there was a diverse group of environmentalists, animal rights,

1 farmers, organic food communities, and government that got
2 together to form this -- these alliance and this common vision
3 and future for our communities. But we've come apart. We've
4 been polarized. We've been divided.

5 In Sonoma -- well, Point Reyes National Seashore, we
6 now have the federal government, the National Park Service
7 collaborating with the Nature Conservancy to remove the organic
8 dairies, the four remaining organic dairies out of the park for
9 no good -- for no -- the vision is not really what's good for
10 the community or food -- the food. There's a disconnect
11 between food, farmers, and the public.

12 In Sonoma County, we have now a ballot initiative put
13 forward by animal rights to eliminate all factory farms or fine
14 animal feeding operations over 200 cows, which is 97 percent of
15 the dairies and 90 percent are certified organic. So, I feel
16 that there's a disconnect and we need to re-engage and be able
17 to communicate as a community and come up with a common vision
18 and common future so we can move forward and build our
19 communities -- our rural communities and our farming systems.

20 And just I want to also talk about we do need to look
21 at fraud but we need to look at -- nurture farmers and make
22 paperwork and certification easier and less onerous because
23 we're losing farmers because of that as well.

24 And then the other thing is that I'm encouraging
25 there to be a National Organic Systems Plan that's standard

1 because it's insane right now. And the -- and also a national
2 organic approved materials list because that's something that I
3 feel that is -- it seems to be something that's necessary. The
4 other -- the last thing is we need to educate the public around
5 what organic farming is and we need to bridge out -- bridge
6 that gap and get educational. Thank you.

7 CHAIR SMITH: Thanks so much, Albert.

8 Kim, go ahead.

9 BOARD MEMBER HUSEMAN: Okay. Hi, Albert.

10 MR. STRAUSS: Yeah.

11 BOARD MEMBER HUSEMAN: I really appreciate your
12 comments today. And as a dairy producer, can you walk us
13 through your feed-cost models over the past 24 months and
14 security of having product available to feed the organic dairy
15 industry in the West Coast?

16 MR. STRAUSS: So, we had a 1,200-year drought and our
17 feed costs went up exorbitantly. Usually, feed costs on
18 organic farms, dairy farms in our area, it's essentially
19 nationwide also. 50 percent of your income goes to feed costs.
20 It went up to 65 percent to 70 percent where if you're much
21 more than 50 percent, you're not making money. And so, there
22 was shortage of alfalfa hay supplies, silage, all forages.
23 Grain prices, as we know, went up around the country for all
24 organic dairies. And so that we were able, thanks to all our
25 efforts and support, to get the Agnet program that has helped

1 with at least a small amount for all the organic dairies in the
2 United States. And there's going to be another round, I think.

3 And so there's -- it's starting -- the feed costs are
4 coming down. We are -- we're having better winters. We have
5 two normal winters now. And so, there's more forages.
6 Hopefully, it won't rain on all the hay crops. But, yeah. So,
7 things are improving. Actually, just this month, I'm hearing
8 from my -- from the other farmers that supply us that they're
9 feeling more optimistic.

10 BOARD MEMBER HUSEMAN: Thank you. And that was not
11 quite in the direction of --

12 MR. STRAUSS: Oh, I'm sorry.

13 BOARD MEMBER HUSEMAN: No, no, no. I wasn't quite in
14 the direction of your comments, but I've been wanting to ask
15 you about those cycles.

16 MR. STRAUSS: Oh. Oh.

17 BOARD MEMBER HUSEMAN: And as a livestock producer,
18 the cycles of your feed costs. And you know, we talked about
19 volatility in the grain markets, the volatility in the feed
20 market, too. And, you know, just wanted to get your opinion.

21 MR. STRAUSS: Yeah, just one thing to add to it. So,
22 we took over the cost of production survey that the State of
23 California used to do. So, we're now benchmarking the cost of
24 production for our organic dairies. So, we can look at our pay
25 price and how we can support them the best. So, that's been

1 really a good tool to really look at how we can make them
2 profitable and successful, improve and pay themselves as
3 managers of their own business, improve their infrastructure
4 and look at the succession of the next generation. And we're
5 putting a percentage above cost as a goal to be able to do
6 that.

7 BOARD MEMBER HUSEMAN: Fantastic. Thank you.

8 MR. STRAUSS: Thank you.

9 CHAIR SMITH: Nate, please go ahead.

10 BOARD MEMBER POWELL-PALM: Twenty-four months ago, we
11 were hearing from the dairy community that it was horrifically
12 expensive feed, as you were describing. We got Agnet for that.
13 And now we're hearing on the other side from grain producers
14 experiencing really low grain prices. What does that
15 conversation look like to strike a deal between feeders and
16 growers where we're able to just hit stability?

17 MR. STRAUSS: Years ago, I was contracting directly
18 with growers -- with grain growers. And so, there was less
19 middlemen. But I'm unusual because I mill and mix my own feed.
20 A lot of our suppliers have mixed feed from mills, buy alfalfa
21 hay when there's not pasture. You know, they're supplementing
22 pasture. So, it's a different model. So, think more of the
23 direct interactions between farmers -- grain farmers and end
24 users like dairymen is an avenue that we can kind of manage a
25 pricing system that could work for both of them.

1 BOARD MEMBER POWELL-PALM: Thank you.

2 MR. STRAUSS: I hope.

3 CHAIR SMITH: Thank you so much, Albert. Appreciate
4 your time.

5 MR. STRAUSS: Thank you.

6 CHAIR SMITH: Up next, we have James Syburg followed
7 by Brian Pontious and then Lauren Scott.

8 MR. SYBURG: Hello. Thanks for your service. Thanks
9 for your time today and welcome to Wisconsin.

10 My wife, Mary, and I farm about 35 miles west of here
11 in a small town of Oconomowoc, Wisconsin. And I've come to you
12 to speak today primarily about the compost situation. I'm a
13 farmer and a composter. I started composting on my
14 grandparents' farm at eight years old. Grew that from
15 basically a backyard operation to a regional composting
16 business that I just recently transitioned out of. Some call
17 it retirement, but when you're still farming, it's not really
18 retirement.

19 And at that time, I transitioned out of it, we were
20 in 31 states, Canada and Mexico. Compost is a vital tool to
21 regenerate and restore soil health and sustain soil fertility,
22 certainly in organic systems. So while you're preparing to
23 listen to others as you know, and those about changing the
24 definition of compost or some of the compost regulations, I
25 would agree with others that have said that the current

1 definition and the current standard for compost has worked
2 really well to produce high quality compost that has proven to
3 be clean, free of any associated problems. It kept crops
4 clean, soil, water, and air clean as well. If there were to be
5 a change, we've listed, during my tenure at that compost
6 company, you know, we listed a number of products through OMRI
7 and, you know, many states look to APCO.

8 I don't know if anybody here has looked at AAPFCO's
9 definition of compost. The American Association of Plant Food
10 Company officials has a definition that is a little bit
11 broader, but compost is not something that is a new technology.
12 And I've always felt that certainly from a systems approach as
13 an organic farmer, I can't technology my way out of a
14 biological problem. You know, I really need to work in that
15 systems approach.

16 Pliny the Elder, you know, in 23 A.D., was writing in
17 Roman times about composting. They would gather their crop
18 residues after harvest, compost them and reuse them. So, it's
19 been around for a couple of thousand years. This isn't, as
20 Yogi Berra used to say, you know, this isn't rocket surgery,
21 right?

22 So, you know, ultimately I think, be cautious, be
23 aware that in corp -- I'm not a scientist and I certainly am
24 not here to disagree or protest against what BPI was proposing
25 to do. But as one that has traveled on thousands of farms,

1 seeing what compost can do and been in foreign countries where
2 the precautionary principle is and oftentimes rule of law, I
3 would say, you know, tread lightly, tread slowly and keep doing
4 the great job that you're doing to get all the information you
5 can before you make a decision.

6 CHAIR SMITH: Thanks so much for being with us today.
7 Let me just see if we have any questions. You have a question
8 from Mindee. So hang tight one sec.

9 BOARD MEMBER JEFFERY: Hi, thank you so much for your
10 comments and your work. Wondering if you had any perspective
11 on whether there's a carbon-to-nitrogen ratio for compost
12 that's too low in an organic system.

13 MR. SYBURG: Yeah, I think that there, you know,
14 there's been comments about carbon-to-nitrogen ratio and
15 certainly looking at a feedstock, you know, if you're mixing
16 leaves with cow manure, you know, they both have different
17 carbon-to-nitrogen ratios.

18 You know, it's a biological process. It needs, in my
19 opinion, an ideal carbon-to-nitrogen ratio. I always looked at
20 the composting business as herd management. You know, we were
21 really employing invisible workers every day to transform our
22 product and relied heavily on that biological process. And we
23 then therefore built the greatest house for them and maintained
24 the most hospitable environment.

25 So the challenge really becomes if you get too far to

1 either end of what is sort of an ideal starting carbon-to-
2 nitrogen ratio, you end up with unfinished compost. You know,
3 and I think that looking at it from an outcome-based finished
4 compost where it will, if the carbon is too high, it's going to
5 tie up nitrogen. No farmer's going to want to put that down
6 and have to add additional nitrogen. And if it is too low in
7 carbon, it has the potential to either leach nitrate --
8 nitrogen or gas it off into the atmosphere which makes no sense
9 either.

10 So having more emphasis in our years of composting
11 was getting to that very stable, high-quality finished compost,
12 which was typically in the, you know, the mid teens, low teens,
13 carbon-to-nitrogen ratio. 12, 15 to 1.

14 CHAIR SMITH: Nate, please go ahead.

15 SECRETARY LEWIS: Distributing in 30, 33 states?

16 MR. SYBURG: 31.

17 SECRETARY LEWIS: You said 31. I can imagine that
18 was a full-time regulatory personnel that had to manage all
19 those listings.

20 MR. SYBURG: Yeah, there's people in the room that
21 helped us with it along with people that have made written
22 comments over the years that really knew how to -- yeah.
23 There's no, as soon as you've crossed from one state into
24 another, there's no consistent, you know, like in the State of
25 Wisconsin, I was not -- even though AAPFCO had said one of the

1 benefits of compost was vigorous roots, the word vigorous in
2 the State of Wisconsin is reserved for synthetic fertilizer. I
3 couldn't say vigorous. So yeah, it was a challenging, but
4 worthwhile effort to get, you know. And then once you went
5 into Canada, you know --

6 SECRETARY LEWIS: Different story.

7 MR. SYBURG: Canada's story is different as well as
8 their, you know, organic compliance.

9 SECRETARY LEWIS: Yeah, so I'm curious in that
10 journey, which of the product of the compost quality tests that
11 those various jurisdictions required you to submit heavy
12 metals, pathogens, which of those tests proved to add value to
13 your product? Which ones were worthwhile doing and were the
14 sort of real concerns that your end users were concerned about?

15 MR. SYBURG: Yeah, I mean, certainly metals and
16 pathogens were important benchmarks, but they were typically
17 used to, as a, you know, a low bar to achieve. The tests that
18 we found were more valuable were bioassays and microbial
19 assays, because again, we were looking at delivering a really
20 high quality compost.

21 When yard materials, which used to be called yard
22 waste in this state, as well as other things, it really was a
23 waste minimization tactic, you know, to take things that had
24 been previously dumped in landfills, you know, and turn big
25 piles of what the heck do we do with it stuff into smaller

1 piles of what the heck do we do with it stuff. And we'd really
2 taken an approach primarily from my grandmother's teaching, you
3 know, to feed the soil, you know, to produce this. So it's
4 really a -- there's a fork in the road from the standpoint of
5 what the desired outcome is.

6 And certainly there's benefits to taking manures,
7 stabilizing them through the composting process versus applying
8 them to the soils, raw. There's all sorts of other variances
9 to it. But, you know, ultimately, if we, you know, we were
10 very successful and we produced a high quality product, I would
11 hope that, and we sold all of it through OMRI-listed and
12 organic approved channels, that if there was anything
13 subsequently potentially added to that, that there could either
14 be competitive harm or somebody else could be, you know,
15 creating tipping fees and income revenue streams in their
16 composting operations that we're choosing not to do, to keep
17 them out of it. You know, or there could be a lowering of
18 trust in the quality of the finished product that's going out
19 there. You know, or worse, that there would be, after the
20 fact, you know, after the horse is out of the barn, you know,
21 it's too late to close the door kind of deal, and now there's a
22 concern about what synthetics might be getting out onto organic
23 fields.

24 BOARD MEMBER POWELL-PALM: Thank you.

25 CHAIR SMITH: Thanks so much for your comments today.

1 Next up, we have Brian Pontious, followed by Lauren
2 Scott, and then Mark Lipson.

3 MR. PONTIOUS: Yeah, I can see it. There it is.
4 Okay. Great.

5 Good afternoon, Chair and members of the board. My
6 name is Brian Pontious. I'm here representing Ingevity, which
7 is based in North Charleston, South Carolina, and employs
8 approximately 1,700 people. For over 100 years, Ingevity has
9 been producing products that purify, protect, and enhance the
10 world around us. Our products reduce emissions, they address
11 pollution issues, and reduce farmers' environmental impact.

12 We are active in the agricultural industry and are
13 members of OTA, DPIA, BPI, and the U.S. Compost Council. On a
14 personal note, before joining Ingevity, I used to work for the
15 State Department of Agriculture. I'm passionate about our
16 farming community, and I'm honored to be representing Ingevity
17 before you today.

18 I'll briefly touch on two topics that we submitted
19 written comments on, which are inerts and compost. On the
20 topic of inerts, Ingevity produces bio-based inerts that
21 enhance the performance of many formulations, resulting in
22 lower application rates and longer retreatment intervals.
23 We're here today because the current process for approving
24 inerts is not working, resulting in fewer options for our
25 nation's organic farmers who are currently unable to utilize

1 higher-performing and innovative solutions that are available
2 to organic farmers in other countries.

3 Some of these inerts, like Ingevity's, not only
4 provide better performance, but can also provide a better
5 environmental outcome in certain situations compared to inerts
6 that are permitted within the National Organic Program. We are
7 asking for a science-based pathway for new inert ingredients
8 that will provide organic farmers with a safe and effective
9 products under a framework that is both sustainable and
10 practical.

11 We support two options the Materials Subcommittee has
12 identified in previous documents to achieve this goal. The
13 first is to allow in organic agriculture inert ingredients that
14 are approved for use in EPA-registered pesticides.

15 Alternatively, NOP can reference 40 CFR Part 180 Subpart D as a
16 starting point since the ingredients on this list have met
17 EPA's safety standard for food use. Ingevity prefers the first
18 option because it provides a clear and more sustainable
19 regulatory framework for allowing safe, new, inert ingredients.

20 On the compost topic, we'd like to offer our support
21 for BPI's petition to USDA. Ingevity is a strong supporter of
22 the composting industry and works closely with composters to
23 ensure they benefit from extended producer responsibility
24 programs across the country. In South Carolina, Ingevity led a
25 coalition of composters and haulers to secure support in South

1 Carolina's state application for the Climate Pollution
2 Reduction Grant Program to ensure that composters and organic
3 haulers will receive funding.

4 We want composters to thrive and continue to expand,
5 but NOP's limitations on compost feedstocks are hurting some
6 composters' ability to process more food waste while still
7 producing compost certified for organic farming. While we
8 understand NOSB's desire to manage compostable products via the
9 National List, we are respectfully asking for USDA to support
10 the BPI petition for rulemaking. We would like all materials
11 that meet ASTM compostability standards to be allowed as
12 compost feedstocks in the National Organic Program. Thank you
13 for your consideration.

14 CHAIR SMITH: Thanks, Brian. We have a question from
15 Brian.

16 BOARD MEMBER CALDWELL: Thanks, Brian. About the
17 inert ingredients, this specific product that you mentioned is
18 not on the EPA list for it, so it can't be used right now in
19 pesticide formulations. Is that correct?

20 MR. PONTIOUS: So, Ingevity makes distilled tall oil,
21 which you may remember from a few years ago, we filed a
22 petition for it.

23 BOARD MEMBER CALDWELL: Oh.

24 MR. PONTIOUS: It's still under review because there
25 isn't a process for it to go anywhere. But it is on the --

1 that 40 CFR part list. It's able to use it in conventional
2 agriculture. But at the time when those EPS lists were made,
3 there wasn't enough data to get it on the right list, so.

4 BOARD MEMBER CALDWELL: Okay, good. Well, that
5 answers my question.

6 MR. PONTIOUS: Yeah.

7 BOARD MEMBER CALDWELL: Thank you.

8 MR. PONTIOUS: Thank you for the question. Okay.
9 Thank you.

10 CHAIR SMITH: Okay. Thanks so much. Up next, we
11 have Lauren Scott followed by Mark Lipson and then Cathleen
12 McCluskey.

13 MS. SCOTT: Hi, good afternoon. Lauren Scott with CJ
14 Biomaterials. CJ is a manufacturer of polyhydroxyalkanoates,
15 or PHAs, which are a bio-based polymer that can be used to make
16 a variety of industrial and home compostable products. As an
17 entity outside the organic agriculture community, we appreciate
18 the opportunity to comment today on the topic of the
19 regulations around compost inputs. The work this board is
20 doing has direct implications on critical issues, including
21 food waste diversion and methane reductions, environmental,
22 human, and animal health. Our company is focused on driving
23 innovation and a widespread shift to biomaterials like PHA
24 because they truly offer a better alternative.

25 The current large-scale use of conventional plastics

1 is damaging our environment through the manufacturing process
2 and through the proliferation of plastic waste and
3 microplastics. Discarded plastics also threaten animal and
4 marine health, sometimes causing death when ingested.
5 Biopolymers like PHA, on the other hand, not only reduce
6 environmental burdens but are proven safe through studies of
7 PHAs as a feed additive for large yellow croaker fish and
8 weaned piglets. PHAs have also been extensively studied as a
9 fish probiotic and PHAs have even been approved for in vivo
10 applications and are now being used for scaffolding or mesh for
11 tissue reconstruction, and have been investigated as a colon
12 drug delivery coating where the gut microbiome degrades the
13 drug coating made of PHA and releases the pharmaceutical active
14 in the colon.

15 Beyond the need to mitigate the risks associated with
16 the use of plastic, there is a critical need to reduce the
17 volume of food scraps that are landfilled. According to the
18 EPA, food waste makes up 24.1 percent of all municipal solid
19 waste in landfills and plastics make up 18-and-a-half percent.
20 By shifting to compostable alternatives to plastics and by
21 ensuring that food waste is composted rather than landfilled,
22 we will curb the methane emissions generated by these products
23 and drastically reduce climate impacts.

24 We know that many prohibitive substances make it into
25 the compost waste stream and that compost -- that composter has

1 spent a great deal of time and money working to remove these
2 contaminants. One common sense policy to address a major
3 source of contamination is to establish an allowance for
4 certified compostable alternatives and specified applications
5 like produce stickers. I use this example because my company
6 is working actively on these technologies and I'll briefly talk
7 about that.

8 CJ has developed a PHA PLA blend film sticker that is
9 industrial compostable. Additional application development is
10 underway that is focused on utilizing our amorphous PHA as an
11 adhesive and creating an all-PHA offering. Produce stickers
12 have historically presented a challenge to make and
13 particularly with respect to the adhesive properties.

14 Amorphous PHA has the mechanical properties to
15 generate a finished sticker that is industrial compostable and
16 will even be home compostable as well as marine and soil
17 degradable. The main limiting factor at this point is demand
18 which is reduced largely by cost. Supportive policy will
19 signal to the value chain an interest in shifting to
20 compostable produce and will allow these products to begin
21 market scale adoption.

22 We recognize -- well, I ran out of time. I'll just
23 say, in conclusion, certified compostable product manufacturers
24 can support the organic farming community by helping to
25 eliminate sources of contamination and by providing products

1 that are protective of human, animal, and environmental health.
2 We're happy to provide the board with some of the literature
3 and testing data that I've alluded to today. Thank you.

4 CHAIR SMITH: Thank you. Thanks for being with us.
5 Appreciate your comments.

6 Oh. Come back to the mic.

7 BOARD MEMBER CALDWELL: Thanks for your comments.
8 The PHA product that you are -- or component that you talk
9 about, when it is made into a finished product, are there other
10 components added to that? For instance, like plasticizers or
11 there's other kind of stabilizers or --

12 MS. SCOTT: So the main reason that we -- so you have
13 PHA-only products but we do add, you know, natural additives to
14 bring down the cost, primarily. But we also have patents
15 across the scope of PHAs and we have an amorphous which is like
16 a flexible and we have a semi-crystalline and we can blend all
17 those together to make a really robust set of high-performing
18 PHA products. But yeah, we mix ours also with PLAs and other
19 biopolymers to make finished products.

20 BOARD MEMBER CALDWELL: Do you add, you know, also
21 petroleum-derived --

22 MS. SCOTT: No, we don't.

23 BOARD MEMBER CALDWELL: -- components? No, you
24 don't. Thank you very much.

25 CHAIR SMITH: Thank you. Up next, we have Mark

1 Lipson followed by Cathleen McCluskey and then Jeffrey Block.

2 MR. LIPSON: Hi, everybody. My name is Mark Lipson.
3 I'm a partner in Molino Creek Farm in Davenport, California, a
4 small vegetable operation. Been certified since 1983 and
5 played some foundational roles in CCOF, Organic Farming
6 Research Foundation. And in 2010, I became the first organic
7 policy advisor at USDA serving in the Office of the Secretary.
8 And my current affiliations are as a pro bono affiliate with
9 the Center for Agroecology at University of California, Santa
10 Cruz. And I work as a freelance consultant on federal policy
11 issues with CCOF right now on the top program with Wolf &
12 Associates and have done some work with Benbrook Associates as
13 well. So I just want to telegraph a few things that were in
14 comments that I contributed to in the Wolf & Associates
15 comments and also under my own name. And then I really want to
16 talk about organic research.

17 In the discussion document on residue testing, I
18 agree the guidance documents do need to be updated. But a more
19 fundamental assessment and makeover of the residue testing
20 system is what's needed because, you know, we don't have a
21 compilation of all those results. We don't have a way of
22 looking at what the total picture is and that seems like that's
23 really necessary in order to have any progress on actual policy
24 making. Especially, I think we need clarification on
25 implementation of 205.670 part (f), which is the public

1 transparency requirement for residue testing. I mean, how does
2 that work? Does that require a FOIA request? Does that go
3 through the certifiers? Does that go through NLP? I don't
4 think we know.

5 On the crop insurance in my comments, I tried to
6 point out that the focus on T yields is only part of the
7 equation that needs to be looked at. And the data point that I
8 think was missed by the -- in the presentation in Providence
9 from the RMA administrator who was there is the loss ratio for
10 organic farms is very high. And the 10-year business report
11 from RMA that she was citing data from, shows that the loss
12 ratio for organic is very high, like close to two -- close to
13 two, twice as much claims paid out as premiums paid. So that's
14 a more fundamental problem than the T yields.

15 On the support for organic transition, the board's
16 analysis needs to include that the design of OTI was not
17 informed by any stakeholder consultation, doesn't have any
18 expressed measurable goals. There's no apparent plan or USDA
19 internal projects that will yield an analysis of OTA and its
20 success. And biggest of all, there's no science component.
21 There's the disconnect from the USDA research agencies and
22 enterprise focused on organic. Between that and NOSB is like
23 to me, just a glaring, flashing problem that needs to be
24 addressed. So I'll stop there.

25 CHAIR SMITH: Thanks, Mark. You have a question from

1 Nate.

2 BOARD MEMBER POWELL-PALM: Mark, sorry if I missed
3 it. What was your point about the loss ratio? What do we need
4 to do with that information?

5 MR. LIPSON: We have to figure out why it is so high.

6 BOARD MEMBER POWELL-PALM: Okay.

7 MR. LIPSON: The insurers, the underwriters aren't
8 going to be able to sustain writing those policies at that
9 level. I mean, their regulations won't let them do that. I
10 mean, I'm not a legal expert on that, but that's what I've
11 always understood. And I was working on this, you know, since
12 2008. So we need to figure out why that's -- there's a lot of
13 fine grained data in the RMA report that could be mined to
14 isolate like where that -- where those problems are. But we
15 don't really know if they're production problems, if they're
16 production -- if they're problems with who the buyers are or
17 the way the policies are being written.

18 BOARD MEMBER POWELL-PALM: Thank you.

19 CHAIR SMITH: Another question from this Nate.

20 SECRETARY LEWIS: I asked Chuck also about that
21 access, the public access to information. He indicated that, at
22 least in his experience, certifiers were eager or flexible
23 enough to work with him. And I'm hearing something different
24 from you around needing clarification about how that process
25 works. And I think we are at a time with this agenda item in

1 our work plan to spend some time working on that. I'm just
2 trying to sort of evaluate priorities. There's a whole bunch
3 of stuff to revamp in pesticide residue sampling, one of which
4 could be a clear roadmap or a clear set of guidance documents
5 for certifiers on when and how to share this information when
6 requested. Does -- do you think that should be a priority,
7 or --

8 MR. LIPSON: Yeah, well, I know that some certifiers
9 have shared data with Dr. Benbrook. I'm guessing that's
10 actually under an NDA. I mean, I don't know that a member of
11 the public could get that data from a certifier or how they
12 would do that, what would be the protocol. So, you know, that
13 portion of the regulation just doesn't have any guidance. So
14 something needs to be provided.

15 CHAIR SMITH: Carolyn, please go ahead.

16 BOARD MEMBER DIMITRI: Great. Mark, I like your
17 wonky kinds of comments. They really appeal to my brain, so.

18 SECRETARY LEWIS: That's my job.

19 BOARD MEMBER DIMITRI: Thank you. For the risk pool,
20 do -- is RMA required to put organic and conventional crop
21 insurance policies in different pools? Like, I often wonder
22 why they just don't put them all together and then target that
23 risk, the loss ratio of one, which they're required to adhere
24 to by law. So that's my first question.

25 And then the second one is, did you have anything

1 else interesting to say about research that you ran out of time
2 for?

3 MR. LIPSON: I don't know exactly how to answer your
4 question about the risk pools from the point of view of the
5 underwriters. But the U.S. -- but the RMA business report does
6 have side-by-side comparison of organic and conventional in
7 counties where organic is insured. And it -- it's a huge gap.

8 So there's a lot of data to be parsed there and
9 figure out why those loss ratios are so high. And, you know,
10 just to reiterate, the price of those organic insurance
11 policies is going to get less and less affordable for
12 producers. And, you know, if it's available at all, if that
13 loss ratio continues to stay that high.

14 And so on research, the Organic Research and
15 Extension Initiative is now -- is getting close to, probably in
16 the next fiscal year, like half a billion dollars of dedicated
17 organic research and extension that's been funded over the
18 years. And it doesn't show up here very much.

19 The list of research priorities is an exercise that
20 the board has gone through for, I don't know, 15 years,
21 something like that. And it's just accumulated. It's gotten
22 bigger and bigger. There's no information coming back.
23 There's no assessment of, does the way these priorities are
24 stated -- the way these priorities are stated, you know, do
25 any good? Does it work for the research community? And what

1 actually are the results?

2 And it's shown up in a number of topics that the
3 board's been trying to tackle. Like, for example, the plastic
4 mulch, you know, at the end of that discussion in Providence,
5 like the question was just hanging in the air. Well, why
6 aren't we getting more research on organic weed management?
7 There's actually been a lot of research on organic weed
8 management. But none of it's coming back here to this
9 discussion. Does that answer your question?

10 CHAIR SMITH: Mindee, please go ahead.

11 BOARD MEMBER JEFFERY: I have a philosophical
12 question for Mark, but in the interest of time and respect for
13 everyone, I'm going to hope I see you in Portland. A little
14 trailer for the Portland meeting.

15 MR. LIPSON: Okay. I'll look forward to seeing you
16 guys on the West Coast.

17 CHAIR SMITH: Thanks, Mark.

18 Okay. Cathleen McCluskey and then Jeffrey Block and
19 then Lori Stern.

20 MS. MCCLUSKEY: Good afternoon. My name is Cathleen
21 McCluskey and I'm the advocacy director with Organic Seed
22 Alliance. We are a mission-driven organization that works
23 nationally to promote an abundant and diverse supply of organic
24 seed tended in perpetuity by skilled, diverse, and
25 interconnected seed communities.

1 Board members, the organic seed sector is at a
2 critical juncture. As the board may know and I've heard today,
3 OSA does monitor organic seed systems in the U.S. through our
4 organic seed report project. Every five years, we release this
5 progress report and action plan for increasing the organic seed
6 supply. In 2022, we released the third update and data showed
7 no meaningful improvement in organic producers using more
8 organic seed. In fact, what we see is stagnation.

9 Today, my colleagues and I at OSA are hearing from
10 seed companies of various sizes and market focuses across the
11 U.S. that their organic seed sales are, as one representative
12 described it, cratering. Erratic sales have also been the
13 subject of a must-responded to seed company listserv that we've
14 been part of in the last few weeks. We do not believe that
15 there is time to wait until our next organic seed report update
16 to collect this data. And so in response to the concerns,
17 we're conducting a spot survey of seed companies about their
18 sales since 2018 so we can get data to start understanding the
19 trends across the sector, from packets to bulk sales. The
20 survey will be distributed this week to seed companies and we
21 plan to share our findings with the board and with the NOP.

22 What I want to underscore is the importance of the
23 NOP in implementing the board's 2018 recommendation to update
24 the organic seed requirement and the 2019 recommendations for
25 updating the organic seed guidance document to support

1 certifiers and inspectors in enforcing the seed requirement.
2 We believe these recommendations can and should be moved
3 forward through a working group on organic seed. The purpose
4 of this working group would be to develop a timeline for crop-
5 by-crop evaluations of the organic seed ability to provide the
6 NOP confidence in eventually closing the exemption for non-
7 organic seed.

8 We see the working group as having a very similar
9 purpose as a crop germplasm committee, serving as subject
10 matter experts to guide NOP staff on best practices for organic
11 seed. And therefore we suggest a similar structure to a CGC
12 with a committee chair and members of the public and private
13 sectors, including those with commercial interests.

14 In closing, we urge the board to include organic seed
15 usage and excluded methods on their work agenda for the Fall
16 2024 NOSB meeting. I'm going to add to your trailer there,
17 Mindee.

18 And, you know, it's really just time for the organic
19 seed policy to catch up with the progress that has been made in
20 organic seed availability by requiring improvement in organic
21 seed sourcing on an annual basis and taking action to protect
22 and enhance the integrity of the organic label. Thank you so
23 much for your commitment to this board and for the opportunity
24 to provide comments.

25 CHAIR SMITH: Boom. I think you're the winner.

1 Winner. Yes.

2 MS. MCCLUSKEY: I practiced a couple times.

3 CHAIR SMITH: Yeah, winner, winner, organic chicken
4 dinner.

5 MS. MCCLUSKEY: You got to stick to the script.

6 CHAIR SMITH: That was good. Nate?

7 BOARD MEMBER POWELL-PALM: Thank you for your
8 comments. Do you think there's a chance that we're looking at
9 this at too high a level and it's really a logistics question?
10 That we don't have the businesses in place to do this work at a
11 regional level?

12 When I think about wheat in Montana, there -- it's a
13 pretty localized industry. Most of our varieties are publicly
14 owned. The seed house is actually doing the work, contracting
15 the seed, cleaning it, have no space in organic. They're not
16 in organic.

17 And so, do you think that there's a certain amount of
18 getting ahead of ourselves before we identify either through
19 survey or through just outreach, possibly through TOPP, an
20 understanding what is that seed infrastructure out there and
21 what is the capacity to have a robust organic seed supply chain
22 before we go a more stick route rather than a carrot?

23 MS. MCCLUSKEY: Yeah, it's a great question, Nate,
24 because it is really crop-by-crop, right? Which is why we are
25 recommending an organic seed working group to develop a

1 timeline to assess, crop-by-crop, what organic seed
2 availability is so we can understand with confidence how to
3 close the loop crop-by-crop. And so it really, it depends on
4 the crop, in my opinion. And in our data from organic -- from
5 the organic seed project, we do see that it is definitely by
6 crop or by crop, what the availability is.

7 And so, I think that there's more research that needs
8 to be done. We are planning to conduct another organic seed
9 report as I mentioned. We'll begin gathering data in 2024.
10 No, excuse me, 2025. But it -- it's a good question and it
11 varies.

12 BOARD MEMBER POWELL-PALM: Do you think it's a better
13 job for OSA to gather that information rather than a working
14 group on NOSB if we're looking to move quickly?

15 MS. MCCLUSKEY: If we're looking to move quickly, I
16 think that it is both and Organic Seed Alliance is doing that
17 through our, you know, through our report. There -- that
18 report has been, Mark, in the past, it was funded by an OREI
19 grant, actually, that we paired with OFRF from, so that 2022
20 report.

21 I think that there is a role, absolutely, for Organic
22 Seed Alliance to play. I think that there are a lot of
23 dynamics, including inside business practices that are really
24 challenging for us to be able to have transparent conversations
25 with seed companies about, as well as handler and producers.

1 BOARD MEMBER POWELL-PALM: Thank you.

2 MS. MCCLUSKEY: Yeah.

3 CHAIR SMITH: Thanks so much for your comments.

4 MS. MCCLUSKEY: Thank you.

5 CHAIR SMITH: Next up, Jeffrey Block, followed by
6 Lori Stern, then Meggan Hain, and then the last speaker today
7 is Maury Johnson. We have four more, guys. Then we have an
8 awesome reception to get to, so.

9 MR. BLOCK: Hi, my name is Jeff Block. I have a
10 couple of affiliations that are important for this. Number
11 one, I'm the organic production manager for Grow Alliance. We
12 are a large, independent contract seed company. My main
13 project is working on organic hybrid corn seed. Secondly, I am
14 the organic committee chairman for the American Seed Trade
15 Association.

16 The issue that I'd like to bring to your attention
17 for this comment is on organic seed usage. And Harriet and
18 Cathleen really set me up because they touched on a couple of
19 the topics that I'm talking about.

20 OSA has done fantastic work in tracking organic seed.
21 The lack of growth in seed usage is a critical issue for
22 organic agriculture, and I agree with Cathleen. In the last
23 years, it really appears we're an industry in crisis. The
24 usage could be even dropping of organic seed.

25 In my role as organic committee chairman for ASTA, we

1 have taken some informal surveys of the group during our
2 meetings the last couple of years. Among other relevant seed
3 topics, seed usage has come out as the top issue from feedback
4 of the committee members. This is clearly an issue overdue to
5 be addressed. On that note, I would like to echo Cathleen as
6 well. It's critical the NOSB push the NOP to take a look at
7 the strengthening organic seed guidance put forward in 2018 and
8 2019.

9 One important thing to add is a caveat that it --
10 seed usage is a nuanced issue. It must be looked at on a crop-
11 by-crop basis because of the different constraints and
12 availability on the crop. Things such as different agronomic
13 needs and different pollination mechanisms create different
14 availability.

15 I'd really need to make a quick pivot to my other
16 affiliation to show an example. As the organic production
17 manager for Grow Alliance, I work with a network of organic
18 hybrid seed growers. This season, beyond what we've contracted
19 with client seed companies, we have available hundreds of acres
20 of fertile certified organic seed corn production ground with
21 highly experienced growers that we cannot use and we do not
22 have contracted demand.

23 We are one of the most experienced, high-quality
24 organic seed corn companies. We can produce a myriad of
25 varieties of organic hybrid corn of all maturities that work

1 well in organic farms. Field corn is one of the crops that the
2 organic seed industry has the knowledge and capacity to produce
3 high-quality seed.

4 We hear from client companies that they have bags of
5 varieties of good organic corn seed sitting on the shelves,
6 unsold, despite there being large amounts of organic corn acres
7 being planted this year and every year. Organic corn does have
8 a higher cost of production but nevertheless, there's solid,
9 established, tested organic production methods. And as these
10 growers become more experienced, the cost of production is
11 going down.

12 Harriet's comment about equivalency like really
13 pertains to the organic corn seed industry because a lot of
14 these varieties we produce are very much equivalent to
15 conventional varieties that are being used for organic
16 production.

17 Really, in closing, a robust organic seed industry is
18 a fundamental and foundational part of creating a sustainable
19 future for the entire organic agriculture. So I really urge
20 the NOSB and the NOP to make seed usage a priority issue.

21 CHAIR SMITH: Thanks so much for your comments. You
22 have a question from Dilip.

23 BOARD MEMBER NANDWANI: Thank you for your comment.
24 It's very simple, quick question. Can you tell a little bit
25 about how do you go for high commercial production for these

1 organic seeds? What's the difference between conventional seed
2 production versus organic seed production? I know you said GM
3 methods and other methods, but --

4 MR. BLOCK: It's really, I mean, the production is
5 the same other than we're doing hybrid corn production in an
6 organic environment. So the difference is basically the fact
7 that we are doing it under organic agronomic conditions.

8 In my company, the way that we've done it is, you
9 know, Grow Alliance was -- is an established hybrid corn seed
10 company. So what we did is we hired organic growers and we
11 have taught them how to produce hybrid corn seed. Taking these
12 conventional methods, adapting them, working with the organic
13 farmers to adapt them to the methods. So there is a learning
14 curve, you know. It's part of this whole organic corn seed
15 industry is one of the reasons the cost of production is high
16 is because there is a learning curve and learning how to do it.
17 And that -- it takes time. You know, our yields have gone up
18 every single year as we work with these growers as -- to teach
19 them the different constraints of seed production.

20 BOARD MEMBER NANDWANI: So basically on the organic
21 farm, certified organic farm and following the NOP practices.
22 Thank you.

23 MR. BLOCK: Yep.

24 CHAIR SMITH: Brian, go ahead.

25 BOARD MEMBER CALDWELL: Yeah, thanks. This is really

1 an important issue. And we've heard a lot of consistent, but I
2 guess, anecdotal information, from a lot of our other speakers
3 about stresses and maybe reductions in organic operations of
4 different commodities basically in the U.S., it sounds like.
5 And I'm just wondering whether a decline or a leveling of
6 organic seed usage could be reflecting basically a plateau on
7 the -- just the general production in the various sectors.

8 MR. BLOCK: That could be. I mean, I don't know
9 either way. It's a subjective opinion, you know? Like, I
10 mean, that's quite a possibility. That's something that's kind
11 of hard to track.

12 BOARD MEMBER CALDWELL: Yeah, and I guess the follow-
13 up would be that the information, that gathering of crop-by-
14 crop seed usage is going to be really valuable to understand.

15 MR. BLOCK: Absolutely. Very important.

16 CHAIR SMITH: You have a question from Amy.

17 VICE-CHAIR BRUCH: Hi, thanks for your time today.
18 This is very interesting. I have raised organic seed corn
19 before, and I can attest it can be done.

20 MR. BLOCK: Yes.

21 VICE-CHAIR BRUCH: I wanted to put a plug in for
22 organic white corn. That is one thing that there's still some
23 decent markets for, organically, and we're just struggling to
24 find any organic white corn. I know there's some testing,
25 there's some trials. But what's the status on production for

1 organic white corn at enough volume for us to use?

2 MR. BLOCK: That's a good question. I can't answer
3 that question. We actually don't -- and our company hasn't
4 worked with organic white corn to tell you the truth, so yeah.

5 VICE-CHAIR BRUCH: Hey, big opportunity then.

6 MR. BLOCK: Wish I could help you guys. Yeah.

7 CHAIR SMITH: Thanks so much for your comments.

8 Okay. Lori, you're up next, followed by Meggan Hain,
9 and then Maury Johnson.

10 MS. STERN: Good afternoon. Lori Stern, Executive
11 Director at Marbleseed. I'm well aware I'm standing between
12 everybody and our -- an amazing reception, so I'll be quick.

13 So, the regenerative narrative and climate concerns
14 are eclipsing the value of two organic practices. These
15 include practices of holistic soil-based systems, third-party
16 verification, and auditable inputs that make up USDA-certified
17 organic, as well as commitments toward equity and farm
18 viability for human-scale farmers in the United States. In
19 this spirit, we would like to propose the following. Organic
20 is climate-smart agriculture. Organic farmers are conservation
21 and climate heroes, early adopters of many conservation
22 practices. Increasing biodiversity is foundational to organic
23 production, from soil to beneficial insects and pollinators.
24 Climate mitigation, including natural seed and livestock
25 selection, will be critical for farmers, along with access to

1 organic seed supply, the theme. We need to support current NOP
2 policies and create new ones to fully demonstrate organic
3 farmers' role in climate and conservation and continuous
4 improvement in this area.

5 Number two, organic is regenerative. A truly
6 regenerative farming system is organic at the foundation.
7 Regenerative involves using whole-farm, soil-based systems and
8 diversified approaches, including managing fertility, saving
9 seeds, and generally reducing off-farm inputs. We must uphold
10 the organic standards that prohibit GMO and other technologies
11 and input that consumers do not want or trust and support those
12 climate healing -- support those that climate healing requires.
13 New policies need to demonstrate commitment to the environment,
14 animal welfare, and farmworker rights within organic to do the
15 right thing and stay relevant to consumer concerns. Government
16 programs, including NOP, need to fund organic as the food and
17 farming system that should be supported.

18 Three, increasing and expanding access to certified
19 organic through domestic grower groups. So grower groups I
20 know has come up as an issue, and I just wanted to bring
21 another perspective. So amid concerns about growth
22 certification, we would like to frame it as access to organic
23 certification, challenges of land tenure, use of incubators in
24 collective spaces to find the beginning farmer experience in
25 the United States.

1 Beginning farmers are more diverse and most already
2 have a deep commitment to organic practices and climate health.
3 Full-time farming is a challenge due to lack of fair pay for
4 farmers at smaller scales, the scale at which most enter
5 agriculture. Shared infrastructure and buying along with
6 centralized record keeping make grower group certification more
7 feasible. It also gives farmers the experience of what will be
8 required to certify on their own should they have the
9 opportunity. We need to connect organic to value chains and
10 local food with dignity efforts.

11 Although the NOP is in ag marketing, third-party
12 verification of the practices that were intended at the outset
13 to protect the environment, human health, and animal welfare
14 are more critical now beyond preserving consumer confidence in
15 the organic market. This is also about evolving the standards
16 to address untested technologies, farmworker rights, and equity
17 in accessing both the label and healthy food.

18 CHAIR SMITH: Thanks so much for your comments. Hang
19 tight. You got a question from Amy.

20 VICE-CHAIR BRUCH: Hello. Thanks for your time
21 today. This is really helpful information. I had a question
22 on your comments on grower groups.

23 I've been in discussion with a few people that
24 actually have some concerns about the marketing opportunities
25 that folks that participate in grower groups have just because

1 they only have one outlet for their crops. So that price
2 discovery is a little more challenging. They have one price,
3 essentially, and not the ability to negotiate.

4 Could you expand a little bit on your knowledge on
5 market opportunities for those that do participate in those
6 grower groups?

7 MS. STERN: So the comments come mostly from a lot of
8 the beginning farmers that we're working with that are
9 potentially part of incubator farms. And then those farms are
10 certifying as a group and then often going direct-to-consumer
11 with those products. So it's a much smaller scale than, I
12 think, probably what you're looking for as an answer.

13 VICE-CHAIR BRUCH: Thank you. There's a lot of
14 diversity within that term. So I appreciate your comment.
15 Thanks.

16 MS. STERN: Yeah, absolutely. Thanks for the
17 question.

18 CHAIR SMITH: Thanks so much, Lori. I appreciate
19 your comments.

20 MS. STERN: Thank you, guys.

21 CHAIR SMITH: Meggan Hain, followed by our last
22 commenter, Maury Johnson.

23 DR. HAIN: All right. Well, thank you guys for the
24 opportunity to speak to the National Organic Standards Board.
25 My name is Dr. Meggan Hain. And I am a veterinarian and animal

1 care specialist with Organic Valley. And I'm here today to
2 talk about the meloxicam petition.

3 So I came to organics because I believe in working in
4 harmony with natural systems is better for the animals, plants,
5 people, and planet. But in my role, my primary responsibility
6 is to advocate for the welfare of my patients, organic animals,
7 and to advise my clients, organic farmers, to provide the best
8 care for those animals. If, as a veterinarian, I recognize a
9 situation on an organic farm which may result in poor welfare
10 for the animals, it is my responsibility to address it, which
11 is why I'm here today to ask for the addition of meloxicam to
12 the National Organic List.

13 Why meloxicam and why now? Well, let me explain. So
14 the meloxicam petition was originated from a collaboration of
15 organic partners which started with three veterinarians who
16 were concerned about research which showed that natural pain
17 relief tinctures commonly used by organic farmers did not
18 provide effective pain control. While these tinctures were
19 easy to give, they only lasted a short period of time.

20 This research has also been recognized by animal
21 welfare certification programs which have started to prohibit
22 the use of natural pain tinctures. In order to ensure that
23 organic farmers have easy and effective pain management options
24 to do what is right for their animals, we decided to petition
25 for the addition of meloxicam to the National Organic List, and

1 as it is recognized as a gold standard for pain control in
2 livestock.

3 Meloxicam is a non-steroidal anti-inflammatory
4 medication. While this is the same as aspirin and flunixin
5 flunixin or Banamine, which are already allowed in organics, it
6 has advantages over either of these. Aspirin only lasts about
7 six hours in ruminants and can cause gastric ulcers with
8 repeated use. Flunixin lasts up to 12 hours, but must be given
9 either in the vein or transdermally, both of which require
10 precautions or skills to administer.

11 In my experience as a veterinarian, farmers are busy
12 people, and if the treatment is time consuming, it is less
13 likely to be done, which may mean unnecessary suffering for the
14 animals. Meloxicam lasts between 24 and 48 hours. It's a
15 pill, so it's easy to give, and it has few side effects, which
16 makes it a win-win.

17 Meloxicam can be used in addition to lidocaine and
18 potentially a sedative to provide optimum pain control for
19 routine procedures such as disbudding or castration. While we
20 recognize that the ultimate solution for procedures such as
21 disbudding would be the use of pole genetics, these solutions
22 will take time to achieve. We still need useful tools to
23 ensure that farmers are able to do what's right for their
24 animals today.

25 As you consider the meloxicam petition and other

1 livestock sunsets before the committee, I ask that you remember
2 that as an organic industry, one of our primary
3 responsibilities is to ensure the welfare of organic animals.
4 Please balance the purity of the organic philosophy with the
5 practical solutions which will allow organic farmers to take
6 proper care of their animals. Thank you.

7 CHAIR SMITH: Thanks, Meggan. Nate has a question
8 for you.

9 BOARD MEMBER POWELL-PALM: Thank you, Dr. Hain. Is
10 there an instance in which there'd be an incentive to overuse
11 this material?

12 DR. HAIN: No. So, I mean, the only thing this would
13 be used for would be sort of pain control. So it's certainly
14 one of those things that there's only a few things that it
15 would be useful for, i.e., those situations that are painful
16 for an animal. Relieving the suffering of animals is always
17 going to be in our advantage within organics.

18 BOARD MEMBER POWELL-PALM: Thank you.

19 CHAIR SMITH: Thanks so much.

20 DR. HAIN: Thank you all.

21 CHAIR SMITH: Okay.

22 MR. JOHNSON: Last.

23 CHAIR SMITH: Woo-hoo. We did it. Almost.

24 MR. JOHNSON: I don't have a joke. I don't have
25 worms. Just me.

1 I did see something though. I was traveling across
2 Indiana or Ohio somewhere on the way up here and I saw this
3 sign that says don't trust atoms, A-T-O-M-S, because they make
4 up everything.

5 Good afternoon. My name is Maury Johnson. I am a
6 fifth generation to operate a farm in the pristine Hans Creek
7 Valley of Monroe County, West Virginia. The farm has met with
8 a few challenges over my lifetime, but nothing like the last
9 few years with the developers of the Mountain Valley pipelines
10 -- gas pipelines. They decided they wanted to build across my
11 pristine agricultural area.

12 I wish to convey some of the harms caused by MVP and
13 the Federal Energy Regulatory Commission, FERC. From the very
14 beginning in 2014, I informed MVP and FERC that I was an
15 organically-managed property. That management was not only
16 critical to my aquifer located in Clark's topography, but also
17 the health and life of my critically health impacted aunt who
18 lives nearby.

19 The pipeline contractors first acted like they had
20 never heard of organic land or organic plans early in the
21 project, even though MVP filed an organic plan with the FERC.
22 Upon meeting with representatives in 2015, 2016, 2017, 2018,
23 2019, 2021, all the way up to 2023, they -- and including
24 language in an agreement that talked about organic fertilizers
25 and non-GMO seeds and no chemicals on the property. The

1 pipeline company, as many contractors, refused to file a land
2 protection.

3 Fortunately, I do not depend upon the organic
4 designation for my livelihood. I have witnessed at least two
5 area organic farms lose their organic designation, and one,
6 Four Corners Farm in Franklin County, Virginia, abandoned the
7 farm several years ago and the family moved away from their
8 dream. In December 2023, MVP decided to abandon even more of
9 the required agreements and their great plan protocols, which
10 has led me into a months-long battle with the pipeline company.

11 I just came from Washington, D.C., where I, in the
12 past several months, I've had to hold meetings with fed
13 officials at FERC. MVP has damaged my farm and others. I have
14 been without usable water from my well for the last several
15 years. That's right. I have no usable water, no running water
16 in my house. Maude has also been hauling water for some
17 household uses for at least five years.

18 Other landowners and farmers across West Virginia are
19 reporting similar impacts and contamination issues. I'm
20 helping with that documentation.

21 I said my farm is organically managed. Under organic
22 designation, because I do not sell products over \$5,000, I
23 qualify for the TOPS program. I have hundreds of pictures of
24 the devastation of the pipeline noncompliance, many of which I
25 have shared with FERC, regional, national, and international

1 media outlets. I am here to ask that -- for help for myself
2 and for landowners across the USA facing these threats from
3 pipeline companies and others.

4 So, once again, I'm asking that you get the Secretary
5 of Agriculture to tell the FERC that farms like mine are
6 legitimate organic farms and educate them, MVP, and other
7 pipeline companies about NOP.

8 See, I practiced.

9 CHAIR SMITH: Thanks. Thank you so much for being
10 with us. We have a question from Wood.

11 BOARD MEMBER TURNER: Thanks so much for the
12 comments. Thanks for -- I'm sitting here just kind of blown.
13 My mind is blown by what you're talking about. I'm just
14 wondering, is this issue of legitimacy? Is that -- you're
15 saying this is a common issue that's happening with farmers
16 that have been designated to have certification? I mean, what
17 -- I'm curious why it's specific to organic.

18 MR. JOHNSON: So, all landowners face problems with
19 these pipeline companies, crossing a problem. It's a
20 particular problem, bad problem, for organics because we can
21 lose, and some have lost, their organic designation.

22 I have traveled -- I won an award last year because I
23 refused to sit quietly. They picked on the wrong landowner.
24 And I have talked with folks from West Virginia, North
25 Carolina, Ohio, Pennsylvania, Nebraska, South Dakota. This is

1 a common theme, especially for organic farmers. And with the
2 big push right now to build thousands of miles of hydrogen
3 pipelines and carbon pipelines, more pipelines, more
4 transmission lines, this is a problem that's going to come to
5 everybody's doorstep. And we -- I'm here to sound the -- I'm
6 asking for help from you all. But I'm also to sound the alarm
7 that we need to get on top of this. They put people out of
8 business and they don't care.

9 CHAIR SMITH: Thanks so much for your comments today
10 and for being with us.

11 MR. JOHNSON: Thank you.

12 CHAIR SMITH: You bet.

13 Okay, guys. We did it. A little bit off schedule,
14 but we did it.

15 You are all invited to a reception being hosted by
16 Organic Valley and several other industry partners. They're
17 all on this flyer. I'm not going to announce them all. It's
18 in the Monarch Lounge right here in this hotel.
19 So we can all head there in just a moment. We will be on
20 recess until 9 central tomorrow, Tuesday, April 30th. Thank
21 you for everybody for sticking with us in the room and for the
22 attendees on Zoom.

23 We're going to be using the same links tomorrow. So
24 please join us again. Same bat time, same bat channel.
25 And see you at the reception.

1 (Whereupon, at 6:13 p.m., the meeting was recessed to, to
2 reconvene on Tuesday, April 30, 2024, at 9:00 a.m. CST.)
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CERTIFICATION

This is to certify that the attached proceeding
before the:

NATIONAL ORGANIC STANDARDS BOARD

IN THE MATTER OF: NOSB Board Meeting, Spring 2024
PLACE: Milwaukee, Wisconsin
DATE: April 29, 2024

was held according to the record, and that this is the
original, complete, true, and accurate transcript which has
been compared to the recording accomplished at the hearing.



Elaine M. LaRosee, CDLR
Official Reporter

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UNITED STATES DEPARTMENT OF AGRICULTURE

NATIONAL ORGANIC PROGRAM

NATIONAL ORGANIC STANDARDS BOARD MEETING (NOSB)

SPRING 2024

Tuesday,

April 30, 2024

Hilton Milwaukee City Center - Arena

Wright Ballroom

9:00 a.m., CST

Day 4

National Organic Standards Board (NOSB) Members

Kyla Smith, NOSB Chair

Amy Bruch, NOSB Vice Chair (Virtual)

Nate Lewis, NOSB Secretary

Brian Caldwell

Jerry D'Amore

Carolyn Dimitri

Kim Huseman

Mindee Jeffery

Allison Johnson

Dilip Nandwani

Nate Powell-Palm

Logan Petrey (Virtual)

Franklin Quarcoo

Wood Turner

Javier Zamora (absent)

USDA/National Organic Program Staff

Dr. Jenny Tucker, NOP Deputy Administrator

Michelle Arsenault, Advisory Committee Specialist

Erin Healy, Director, Standards Division, NOP

Jared Clark, Acting Assistant Director, and

National List Manager, Standards

Andrea Holm, Agricultural Marketing Specialist, Standards

Heather Kumar, NOSB Technical Support Staff

Johanna Mirenda, Agricultural Marketing Specialist,

Standards

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

2 (Time: 9:00 a.m., CST)

3 CHAIR SMITH: Good morning. Good morning, everybody.
4 Welcome to day two.

5 I hope everybody had a fun night last night, good
6 reception, lots of teas, cured meats, always fun times. We
7 have a full day today. And welcome back to our Zoom
8 participants. And good morning, Logan and Amy.

9 Okay, we have a full day today. We are going to hear
10 from the Livestock Subcommittee and Materials and Policy
11 Development Subcommittee. That's all before lunch.

12 And then when we get back from lunch, we are going to
13 hear from a compost panel and then round out our day with the
14 Crops Subcommittee. So I'm just going to be passing the mic
15 off a lot today, which is good, because I did a lot of talking
16 yesterday. So I'm going to pass it over to Brian Caldwell. He
17 is the chair of the Livestock Subcommittee.

18 BOARD MEMBER POWELL-PALM: Thanks, Kyla. Do we need
19 to do roll call? Do we need to do roll call?

20 CHAIR SMITH: Michelle says no.

21 BOARD MEMBER POWELL-PALM: Okay.

22 BOARD MEMBER CALDWELL: All set? All right, good.

23 Just a couple of quick words before we start. A
24 little report, the Livestock Subcommittee has really been
25 focusing on the sunset reviews for the last six months. But I

1 wanted to say that we really are keenly aware of the stresses
2 on livestock producers caused by the widely fluctuating grain
3 prices. And over the past three or four years, I know we've
4 lost in New York State quite a few of the smaller dairies, and
5 I don't think they're coming back, mostly in the plain
6 community. And I just really hope that the Strengthening
7 Organic Enforcement Program will begin to stabilize supply and
8 demand in a way that we can move forward in a really positive
9 way. And I'm so thankful that that is all happening.

10 I want to point out that the Livestock Subcommittee
11 will be missing -- we will be losing two of our most
12 experienced and knowledgeable members at the end of this year,
13 so please recruit people to serve on this Board who are
14 knowledgeable, deeply knowledgeable in livestock. And we will
15 then try to recruit them to be on the subcommittee. Really
16 appreciate that.

17 And after the sunsets, we will have a sneak preview
18 at the Meloxicam petition. So everybody will be really excited
19 about that.

20 All right, now let's start with the sunsets. And
21 we'll start with Atropine and Franklin, you're first. Thanks.

22 BOARD MEMBER QUARCOO: Good morning, everyone.

23 BOARD MEMBER CALDWELL: I would love it if you would
24 do that or somebody. Yeah, thanks.

25 BOARD MEMBER QUARCOO: So the first thing is

1 Atropine. It's listed under 205603, synthetics allowed for use
2 in livestock. Atropine is actually used for taking care of
3 livestock when it comes to organophosphate poisoning.

4 But I'll talk about some of the restrictions shortly.
5 It's an animal medicine drug use classification. And you can
6 use it by law only under the written consent or oral order of a
7 licensed veterinarian. There are also restrictions like a mid-
8 withdrawal period of at least 56 days after administering to
9 livestock. Also, if dairy cows, there's a milk discard period
10 of at least 12 days. So all of these restrictions, I'll come
11 back to them later, and that's how they help.

12 The last TR was in 2019. So let's talk about what it
13 is. So it is a naturally occurring alkaloid produced by plants
14 in the nightshade family. It is isolated from what we call --
15 primarily from what we call the deadly nightshade, Atropa
16 belladonna. It's used as a component in both human and
17 veterinary medicine for a range of treatments, but the main one
18 that I talked about earlier is used as a treatment for
19 organophosphate poisoning.

20 Now, there are a number of regulations. I will not
21 go over them, but like I said, you are to have a licensed
22 veterinarian permit it to be used. And it's usually used in
23 very small quantities.

24 The primary source is assessed by extraction from
25 plants in the nightshade family, and it yields what we call a

1 racemic mixture. It has -- okay, it reflects the polarized
2 light left and right. Level rotary to the right, level
3 rotatory to the left. But the racemic mixture, it combines
4 both of these. And that's what the actual atropine is.

5 It can also be synthesized in an acid-catalyzed
6 esterification reaction between tropine and tropic acid. But
7 the primary source is from plant extracts.

8 International acceptance is listed for use in Canada
9 as a health care product in production aids. But it has to be
10 as a medicine from herbaceous plants. European Union, not
11 explicitly mentioned. Codex, it is not listed. IFOAM is not
12 listed. Japan is not listed.

13 So let's talk a little bit about the human health and
14 environmental issues associated with atropine. They are used,
15 first of all, because of the restrictions associated with it.
16 You cannot use it unless a licensed veterinarian authorizes
17 you. And in small quantities, especially milligrams in which
18 it is used, it's not likely to cause a lot of environmental
19 problems. There are no reported studies on the persistence or
20 concentration of atropine in the environment. What else?

21 It is largely degraded to tropine and tropic acid
22 prior to excretion. And human beings, just like animals, we
23 excrete it in the same way. It's regularly excreted in urine.
24 It has a short biological half-life in hours.

25 So I want to emphasize that it is approved for use

1 only when ordered by the -- I know this is the third time I'm
2 saying that, so, and then there's small quantities in which it
3 is used. So it's not likely to accumulate in the environment
4 and cause problems.

5 Committee discussions previously in written comments
6 were submitted in the spring of 2019. All commenters
7 recommended releasing it. And the materials satisfy our offer
8 criteria. And NOSB supports releasing it. And currently, the
9 comments that we've received are all in support of atropine.
10 So that's about it, if there are any comments or questions.

11 BOARD MEMBER CALDWELL: Okay. Last call, comments,
12 questions. All right, Franklin, well, you're up again for
13 hydrogen peroxide.

14 BOARD MEMBER QUARCOO: All right. So hydrogen
15 peroxide also listed at 205603. Synthetics allowed for use in
16 livestock production.

17 Okay, the last year was in 2015. What is it actually
18 used for? It's used in -- this agricultural disinfectants
19 containing hydrogen peroxide are being used for disinfecting
20 livestock, housing surfaces, and production equipment.

21 Give me a second. Okay. It's permitted for use in
22 organic livestock production as a disinfectant, sanitizer, and
23 medical treatment.

24 It is also permitted for use in products labeled as
25 organic or made with organic ingredients. How is it

1 manufactured? It is manufactured using what we call the
2 anthraquinone auto-oxidation process.

3 It's a two-step process. The initial one is a
4 catalytic reduction of an alkyl anthraquinone with hydrogen.
5 So it's a reduction reaction.

6 And then it forms a hydroquinone. And then this is
7 followed by auto-oxidation of the hydroquinone in air to
8 regenerate the anthraquinone. And the hydrogen peroxide is
9 released.

10 The simplified version is just an addition of
11 hydrogen and oxygen to form hydrogen peroxide. When you
12 simplify it, that's what it is. And you take out the
13 anthraquinone and other components.

14 International acceptance, it's allowed for use in
15 Canada as a production aid in livestock production. Let me
16 look at the other places. European Economic Community, not
17 explicitly mentioned. And a few other places, CODEX not
18 explicitly mentioned. And that's about that.

19 Now, talking about what is the main primary innate
20 ingredient in hydrogen peroxide, when we talk about ancillary
21 substances.

22 Some other products are listed, like salicylic acid,
23 phosphoric acid, benzoyl alcohol, acetic acid, citric acid, and
24 there's one that's butoxypropan-2, xaloxopropan-2-0. It's
25 actually an alcohol, or alkanol, basically.

1 Let's talk about human health and environmental
2 issues associated with it.

3 One of the things about it is that it is inherently
4 unstable, which I'm going to get back to. It's unstable. The
5 oxygen bond is weak, so it's unstable.

6 So at typical pesticide concentrations, it's expected
7 to degrade to water and oxygen. And degradation, it degrades
8 both in aerobic, that's when there's oxygen, and anaerobic
9 conditions. And when it degrades, the soil half-life is about
10 four hours in soil containing petroleum products.

11 So I've talked about the half-life, so I'll not go
12 into that again. But when it is released into the environment,
13 degradation, it's usually because of light catalyzing a
14 breakdown of the product. And it breaks down, and then there
15 are also chemical reactions with organic substances.

16 Now, one important thing that I want to point out is
17 that light, oxygen, ozone, hydrocarbons, and free radicals in
18 the atmosphere, the immediate -- they facilitate the hydrogen-
19 peroxide formation in quantities that are far larger than
20 anything that we can produce. So that's an important point to
21 note about hydrogen peroxide.

22 A lot of studies on skin sensitization, which
23 suggests that hydrogen peroxide is not likely to be a
24 sensitizer to mammals.

25 So I already talked about the half-life, but let me

1 now talk about, in soils, it's usually both in conditions where
2 you have oxygen and out - without it we have about one to seven
3 hours. So this is not a very stable compound. It breaks down
4 pretty quickly, which is good, so it's not persistent.

5 It is considered slightly toxic to practically non-
6 toxic to birds on an acute oral basis, which is a good thing.
7 It is also slightly toxic to aquatic invertebrates, practically
8 non-toxic to fish on an acute exposure level. In contrast to
9 the birds and all of these other micro-organisms, which is what
10 is needed for, they are very sensitive to hydrogen-peroxide,
11 which is both a good thing and a bad thing.

12 It's a good thing when you are trying to disinfect
13 something, but some micro-organisms, like mycorrhizae and other
14 things are beneficial, some micro-organisms are also slightly
15 affected. But when it comes to animals, the quantities in
16 which they are used and how they are released, you are not
17 likely to run into that. When it comes to the plant session,
18 I'll leave that to my colleague to discuss what happens when
19 they are released in larger quantities.

20 What else? So I'll move. There have been a number
21 of studies -- the EPA has classified it as grass, like
22 generally recognized as safe. There are some inhalation
23 issues. Basically, if folks follow the recommended safety
24 practices, you should be fine.

25 It's unlikely to cause chronic toxicity in humans

1 because it's rapidly broken down. Another thing I want to
2 quickly mention before I get to the end is that it is actually
3 used in dealing with moderate spills. So when there's an oil
4 spill in an aquatic environment, hydrogen peroxide is used in
5 the cleanup process. It's also being used to treat wastewater.

6 So most of the time, we are worried about what it
7 will do. But here's a case where they are actually putting it
8 in water to deal with a problem. So it tells you how we should
9 feel about it. So that's about most of the major things I want
10 to say about that.

11 In the fall 2019 meeting, the Livestock Committee
12 received comments in favor of it. And the current comments
13 received are also in support of releasing the product. That's
14 about it. If there are any questions.

15 BOARD MEMBER CALDWELL: Yeah. Franklin, thanks. I
16 really appreciate your thorough and careful thinking about all
17 this.

18 I just wanted to point out that I think that hydrogen
19 peroxide is a really important tool in the sanitizer suite and
20 probably the most benign, simply as you pointed out, because it
21 disappears very quickly into oxygen and water. So great.

22 Other comments, questions?

23 All right. Nate Lewis, iodine.

24 SECRETARY LEWIS: Let's see here. Iodine is listed
25 at 205-603-A as a disinfectant and then again at 205.603(b)(4)

1 as a topical treatment, typically in the form of teat dips.

2 As we all know, iodine has excellent antimicrobial
3 qualities. It's used for surgeries, as a disinfectant during
4 surgeries, and then most commonly used as a pre- and post-
5 milking teat dip to support udder health in dairy animals.

6 Let's see. Typically, iodine doesn't show up as just
7 pure iodine. It is complex with a variety of iodophors. And
8 then there are often a number of excipients added to iodine
9 formulations. These excipients are allowed via the national
10 list at the excipient allowance. But that excipient allowance
11 does pave the way for some less-than-desirable materials to be
12 included in those formulations. Among those are a class of
13 substances called nonylphenol ethoxylates, which I'll refer to
14 as NPEs for the rest of this introduction.

15 I thought it was kind of interesting that -- well,
16 the things I find interesting might not be shared among
17 everybody. But iodine itself is fairly -- it's really harsh to
18 animal skin. So typically, moisturizers are added, and one of
19 the most common ones is glycerin. But then we also find out
20 that there are some formulations that use lanolin, which I
21 thought was kind of just an interesting sort of cross-species
22 mixture.

23 So anyway, the glycerin that's used as a moisturizer
24 is allowed also on the national list at 603(a)(12), only
25 produced through the hydrolysis of fats and oils. Teat dips

1 are used around the world. All our trade partners allow
2 iodine-based teat dips. There are ancillary substances, as
3 I've already explained, primarily allowed via the excipient
4 clause. And while iodine itself is not particularly toxic or
5 poses very acute concerns for human health and the environment,
6 those excipients, namely NPEs, do.

7 And NPEs are well known to be toxic to aquatic
8 organisms. They bioaccumulate in plants. And they've been
9 shown to exhibit estrogenic properties in human studies.

10 So these are things that really -- these are a class
11 of substances that really don't align with organic values and
12 organic principles. And every effort, in my opinion, should be
13 made to try to exclude them from the inputs we use in the
14 organic production practice.

15 As part of this work, the subcommittee did get a
16 limited scope TR to look at NPEs specifically in iodine teat
17 dip. That TR identified iodine teat tips as the largest
18 potential contributing source of NPEs on dairy operations. So
19 if we think about the way these things would flow is they're
20 used on a cow that's then flushed into a manure lagoon, which
21 is then sprayed onto a field. And these NPEs have a direct
22 path to the runoff on a farm and would sort of accumulate into
23 those waterways. So it really, for me, is a particularly
24 concerning element of the use of this substance.

25 We want to acknowledge and make sure the dairy

1 producers out there recognize that we completely support the
2 continued use of iodine as a critically necessary tool. And I
3 did not hear anyone on the subcommittee raising their hand to
4 support any sort of delisting motion.

5 What we spent much of our time talking about was
6 whether there would be room to propose an annotation on iodine
7 teat tips to exclude those formulations that include NPEs as an
8 excipient.

9 And based on public comment, I think that's something
10 that we should continue to consider and potentially bring
11 forward in the fall would be a parallel motion to annotate
12 iodine and exclude nonylphenol ethoxylates from those used on
13 organic dairy animals or organic livestock in general.

14 I want to highlight one comment in particular from
15 Beyond Pesticides that I think provided some pretty good
16 language for that potential prohibition, which would be to not
17 use the nonylphenol ethoxylates, but use the broader umbrella
18 term of alkylphenol ethoxylates. So that's something I want to
19 explore a little more, but I really appreciated that level of
20 granular detail that they provided in public comments.

21 We also heard in public comments that it does not
22 appear like it will be a challenge for producers to find
23 formulas that are compliant with such a restriction. It may
24 add another layer of compliance review for certifiers and their
25 relationships with operations on their specific materials lists

1 and systems plan. But certifiers do this all day long for lots
2 of other materials. So while I really appreciate not wanting
3 to overload certifiers with all the new rules and all these
4 different things, this one seems fairly straightforward in
5 terms of how a review could be done. Typically, nonylphenol
6 ethoxylates or alkylphenol ethoxylates, which is the broader
7 class, are listed on MSDSs. So the review is, again, very
8 straightforward. These are not sort of hidden in a formula.
9 They're usually listed pretty explicitly on an MSDS for a
10 product.

11 So anyway, these are all the concerns we'll be
12 weighing as we consider whether or not or how we would move
13 forward with a restriction on this substance. But I think it
14 would move the needle a little bit on reducing the impact
15 organic dairy farms are having on the environment to restrict
16 this substance somewhat. And I think that's about it. I'd
17 entertain questions or comments from folks.

18 BOARD MEMBER CALDWELL: Should I call on people?

19 CHAIR SMITH: Yes.

20 BOARD MEMBER CALDWELL: Okay. Allison?

21 BOARD MEMBER JOHNSON: Thanks, Nate. This is
22 helpful.

23 How does the NPE issue here interact with the inerts
24 process? It sort of -- it feels like jumping ahead to add the
25 annotation and restricting them, if we could then just sort of

1 have that be high on the list of inert review, but I know
2 there's a staging issue.

3 SECRETARY LEWIS: Great question. They're actually
4 distinct issues. So nonylphenol ethoxylates and iodine teat
5 dips are not allowed via the list four allowance. They're
6 allowed via the excipient allowance, which I don't have that
7 reference at the top of my list. So NPEs are on list four.
8 NPEs are also allowed excipients. And so whatever we do with
9 inerts will not affect iodine teat dips.

10 And so we may in the future want to take up
11 excipients and relive the joy of inert ingredients, but in
12 livestock products. In that case, we will probably want to
13 address NPEs as a whole. But in this particular situation,
14 because it's not related to the inert ingredient issue, I think
15 it justifies the consideration of a specific annotation. But
16 it's a great question and good clarification for the Board.

17 BOARD MEMBER POWELL-PALM: Yeah, Kyla.

18 CHAIR SMITH: Thanks, Nate.

19 As the Livestock Subcommittee is deliberating on how
20 to frame this up, I just wanted to point out MOSES's comments.
21 They had some good feedback and good questions to think about
22 relating to excipients versus complexing agents versus are we
23 listing task numbers and all those things and just pointing out
24 what's currently in the ACA best practices document.

25 So I would just encourage the subcommittee to take

1 all those points into consideration. Thanks.

2 SECRETARY LEWIS: Appreciate the reminder.

3 BOARD MEMBER CALDWELL: Other comments, questions? I
4 guess I wanted to thank Nate again. Really, really good
5 thinking on this.

6 And can you remind me of -- there's inert excipients,
7 and then there's one other group of additives that are mixed
8 with -- there's one for food handling materials and one for
9 medicines. And then inerts are for pesticides. I can't
10 remember how that works.

11 SECRETARY LEWIS: I'm not exactly sure. Is it
12 ancillary substances or nutrients?

13 BOARD MEMBER CALDWELL: Ancillary substances. Yeah.
14 So -- and ancillary substances are for process products?

15 SECRETARY LEWIS: Well, there is a recommendation
16 related to ancillary substances used in process product
17 ingredients and how to do the review of those substances.

18 BOARD MEMBER CALDWELL: Excellent. I just wanted to
19 kind of try to get it clear in my own mind and lay it out for
20 people that this issue of things that are mixed with main
21 ingredients is a big one. And I'm pretty sure that excipients
22 comes up next year for sunset review. And as I recall, the TR
23 said there are 8,000 excipients listed.

24 So these are tricky to deal with, but we're dealing
25 with them, so that's great.

1 I also wanted to point out that Nate is on every
2 single subcommittee. So he kind of knows everything, and we
3 appreciate you putting in all of those hours.

4 SECRETARY LEWIS: Just to correct for the record, I
5 do not know everything.

6 BOARD MEMBER CALDWELL: Okay. All right. So any
7 other questions, comments?

8 Okay, we're going to move on to me, and I'm going to
9 talk about magnesium sulfate.

10 And that is listed at 205.603 as a disinfectant
11 sanitizer in medical treatments. It is used for several
12 veterinary purposes, mostly deficiency of magnesium and also
13 digestive issues. And the one thing that came up while I was
14 reviewing this that -- just kind of was a little bit of a
15 question for me is that it can be either a mined or synthetic
16 product.

17 And I think we need to get some feedback from the
18 community about the availability of mined products, which if
19 they were widely available and in common use, we might be able
20 to get rid of this listing. But as far as I know, most of the
21 products are synthetic, and I'm just not sure how available
22 mined natural products would be.

23 But it's essentially a very benign substance. It's
24 been on the national list since 1995. Magnesium sulfate is
25 just that magnesium ions and sulfate ions are just ubiquitous

1 in nature, and there's no toxicity associated with the
2 compound. So it's good, I believe, in environmental reviews.

3 It's allowed by Canada and the EEC. And the other
4 ones that we always check, which is IFOAM and Japan and Codex,
5 don't list it. Written comments were that five were in favor
6 of relisting, and one specifically said we should investigate
7 this issue of whether there are non-synthetics available first.
8 And zero people called for delisting.

9 So I think that covers it pretty well. It's
10 definitely essentially a benign substance that has some
11 important veterinary uses and has been in wide use for some
12 time.

13 So any questions on that one? All right. So Nate
14 Powell-Palm, fenbendazole.

15 BOARD MEMBER POWELL-PALM: Thank you, Brian.

16 I am one of those diehard livestock people who are
17 going to be leaving, so I wanted to echo Brian's call for
18 finding those folks who are excited about dairy, excited about
19 poultry, just excited about the potential that animal
20 agriculture has for organic.

21 I have been privileged to be working with Kim on a
22 lot of these different materials, and it's given me the chance
23 to think about our role as an organic community in ensuring
24 that when we have livestock, living beings, as our partners in
25 food production, how do we treat them as well as we possibly

1 can?

2 And so we had fenbendazole, which will be used as a
3 parasiticide. And you all can read what's up there. But the
4 big thing that I realized over this time was how lucky we are
5 to have veterinarians who are dedicated to studying and
6 understanding this issue. How do we do livestock agriculture
7 right in organic?

8 So I want to say thank you for all the veterinarians
9 who serve the organic community.

10 Kim, could you tell me what a very wormy cow looks
11 like?

12 BOARD MEMBER HUSEMAN: I was about to ask you that.

13 Well, she's probably pretty young and mangy. And
14 with the proper treatment, she doesn't have to be mangy and
15 gant and sickly.

16 BOARD MEMBER POWELL-PALM: And since you're going to
17 be doing moxidectin, I feel like we can have this little
18 conversation right now. When we're thinking about practices
19 that are preventative for making sure we don't get parasiticide
20 outbreaks, we have a toolbox. Could you tell us a little bit
21 about what that toolbox includes?

22 BOARD MEMBER HUSEMAN: So the parasiticides?

23 BOARD MEMBER POWELL-PALM: For the parasiticides.

24 BOARD MEMBER HUSEMAN: Yeah. So we have
25 fenbendazole. We have moxidectin, and ivermectin was removed

1 from the national list. So we have two.

2 BOARD MEMBER POWELL-PALM: Yeah. And in discussing
3 these materials with our veterinary community, this is a pretty
4 good set. We have the materials we need in order to make sure
5 that we are able to address parasite loads. We also have a lot
6 of preventative practices that are going to be essential.

7 But this -- and when I think about me as a cattle
8 raiser, when you look at a young animal who just cannot thrive
9 because they've got a parasite load, I'm so grateful that we
10 have these tools in order to relieve those young animals of
11 that pressure. We still want to focus on preventative
12 measures, but in thinking about how are we proceeding with
13 making sure organic is the animal welfare rule, the animal
14 welfare standard, these materials give us a lot of support.

15 BOARD MEMBER HUSEMAN: And just to add on to that, I
16 really appreciate the comments we got from the community.
17 Pasture grazing is so important for our animals, and being able
18 to continue to pasture graze and be able to treat when there's
19 a concern. Obviously, proper rangeland rotation is helpful.
20 Everyone we spoke to has an OSP. They have an emergency plan,
21 and it includes using these parasiticides.

22 So really appreciate the support from the community
23 to point that out and to bring that forward. I just feel like
24 these are so essential to not only the beef industry, the dairy
25 industry, but let's not forget that we also have sheep, the

1 wool industry, and organic goats as well. So the Montana
2 farmers that want to speak about their four-legged friends that
3 are used, the smaller four-legged friends that also have the
4 benefits of these parasiticides. I don't want to leave those
5 out either, but we've worked collectively.

6 We have a buddy system on our sunsets where there's a
7 presenter. Then there's also a secondary person that helps to
8 overlook the sunset for just a second set of eyes as we present
9 these. And Nate and I buddied up on this. So you'll hear from
10 us again in a little bit on a couple other projects. But this
11 has been a great one, I think, that we both support in the
12 community.

13 BOARD MEMBER POWELL-PALM: One quick note, or longer
14 note, that the community made was how -- in organic, kind of
15 building off of the testing question that CACS has been
16 discussing, how can we know what's out there? And I think that
17 we heard from veterinarians as well as other folks that fecal
18 testing, to understand what that parasite load is, is a really
19 great tool. And I think as an inspector, I've not done a lot
20 of examination of fecal tests to try to understand when and how
21 are we making these assessments.

22 And so it seems like a point of improvement to have
23 more education to producers, to bring that discussion more to
24 the floor of certification. And that was something that we
25 heard reflected in both written and oral comments. And I'm

1 going to kick it over to Kim to see if there's anything else
2 for moxidectin.

3 BOARD MEMBER CALDWELL: Well, let's go to questions
4 now about this one, fenbendazole. Yes, Jerry.

5 BOARD MEMBER D'AMORE: Thank you. Fenbendazole, in
6 my first year, was right up front, and it was the thing that
7 told me that there can be horrors in this. And it was with
8 chicken layers and the worms in the eggs. And I called you and
9 said, hey, I need help. I really need to understand. Is there
10 another way to get this done? And at that point, you said to
11 me, yeah, just increase the range. Just give them more space.

12 It seemed that you almost said that here, but it
13 didn't come across quite that clearly. You're obviously
14 dealing with something that becomes more acute, and it has to
15 do with death rather than worms and eggs. Would that be a --
16 help me understand that distinction if that's not right?

17 BOARD MEMBER POWELL-PALM: Yes. So for the livestock
18 species that we're talking about in this listing, they're going
19 to live a lot longer than a chicken. And so we're going to
20 have periods of production where they're going to be more
21 susceptible as they're getting out onto the pasture.

22 And so when we think about a heifer, say, a young
23 calf, or a calf that's just getting out onto pasture, it's just
24 a much weaker animal than, say, a full-grown dairy cow, who's
25 going to have some built-in resistance. And so spreading them

1 out is one path. It's definitely the best path to try to get
2 as much range, as much space, move them out around as much.

3 But if, for some reason, they do pick up
4 parasiticides, it is a heavy load to bear, and especially for
5 animals that are going to live maybe 15 years, to protect this
6 period of their production and make it so that we can have it
7 so that they're not mangy and weak and suffering, it seems like
8 a really good tool to be able to have, not for slaughter, as
9 the listing clearly states, but for a milk or fiber-bearing
10 animal that's going to go on to be a breeder stock or produce
11 milk or fiber. Thank you.

12 BOARD MEMBER CALDWELL: Other questions?

13 Well, I have a comment about this. And that is that
14 I was involved in writing the NOFA-New York's first set of
15 organic standards in the early '80s. And this was
16 parasiticides -- oh, did I miss somebody?

17 Oh, excuse me, Amy, I'm sorry. Go ahead, Amy. Then
18 I'll rant.

19 VICE CHAIR BRUCH: No, go ahead, Brian. That's fine.
20 I just had a comment, not a question. Go ahead.

21 BOARD MEMBER CALDWELL: Okay. Well, I'll be quick,
22 Amy, actually.

23 But parasiticides was an important issue that we were
24 wrestling with then. And it still is. And this is almost 40
25 years later.

1 But I wanted to point out that our technical
2 assistant, Heather, is doing a comprehensive review of the
3 literature about parasiticides and basically management,
4 particularly oriented towards organic methods to reduce and
5 control parasites in grazing livestock. So this gets back to
6 the question of when we put our research priorities out, how do
7 we get that information back that may be out there in the
8 research community?

9 They may have done a study in 2014 that is very
10 relevant, but we don't necessarily capture that. Well, Heather
11 is going to look for those. And we really appreciate that.
12 And that is a way that we're trying to close this loop, this
13 information loop that's really, really important to moving
14 forward with all our sunsets and all our management techniques.

15 So Amy, go ahead. Sorry.

16 VICE CHAIR BRUCH: That was a great point, Brian.
17 That's really helpful to understand that work's being done.
18 And thank you, Heather, for helping us with that.

19 I was just going to say thanks to Kim and Nate. That
20 was a pretty awesome delivery of a sunset. You represented the
21 livestock producer voice very well, and it was really
22 digestible for this grain farmer to understand the importance
23 of the substance. So thank you.

24 BOARD MEMBER CALDWELL: So Nate.

25 SECRETARY LEWIS: I think the comment I'd like to

1 make about parasiticides in general is sort of a foreshadowing
2 of some work that I'd like to see the Board do probably in the
3 CACS committee with support from livestock, which would be to
4 sort of draw the line between all of the pieces of the
5 regulation that currently exists related to parasiticides. So
6 we have a definition around the routine use of parasiticides.
7 We have a prohibition on that practice in the livestock health
8 care standard.

9 We have with OLPS, a requirement that producers have
10 a parasite management plan. And we have some tools on the
11 national list with some complicated annotations. So I think
12 that's enough pieces of a jigsaw puzzle to end up with
13 something that could be really useful to try to harmonize
14 approaches. So I look forward to doing that work.

15 BOARD MEMBER CALDWELL: Great, thanks, Nate.

16 Other questions, comments? Okay -- well, oh, sorry,
17 Amy, I'm not used to looking at that. Go ahead.

18 VICE CHAIR BRUCH: No problem. Thanks for including
19 me in the discussion.

20 No, Nate, I was just going to say I added that to the
21 punch list. I think that highlights the nature of how the
22 Board is morphing into cross-collaboration between
23 subcommittees. So that was a good example of where CACS can
24 assist livestock. And maybe we'll also hear some elements of
25 that later on today with compost. So thank you. I've got it

1 on the punch list.

2 BOARD MEMBER CALDWELL: Great, that sounds really
3 good.

4 Okay. We will move on to Kim, who is going to talk
5 about moxidectin. And Kim is our other highly valued colleague
6 who will be leaving us at the end of this term. And boy, we're
7 going to miss Nate Powell-Palm and Kim Huseman very much. So
8 go ahead, Kim.

9 BOARD MEMBER HUSEMAN: Thank you, Brian.

10 Well, Nate and I kind of doubled down on
11 fenbendazole, and without repeating moxidectin, I'll just say
12 that regionally, what's available for a parasiticide, it's more
13 of a choice of which one you grab off the counter or what you
14 have available.

15 I'll point out, just going a little bit more
16 formally, I think, through the listing, there are guardrails
17 around slaughter animals and prohibition on that front. The
18 milking guidelines, there's a component around that. It's 36
19 days following treatment of goats, sheep, and other dairy
20 species, cannot be used -- the products cannot be used --
21 milking products cannot be used following treatment. In
22 conventional livestock, it's 10 to 14 days.

23 So there's definitely guardrails that have been put
24 up. It's been well-evaluated. Moxidectin, when it came on the
25 national list, it took a little bit of time and evaluation,

1 making sure that it was used as a parasiticide.

2 So I feel like there was a lot of work that had
3 already been done on that front. And yeah, I think, really,
4 it's interchangeable, Brian. So if there's other questions, we
5 can proceed.

6 BOARD MEMBER CALDWELL: Questions on moxidectin? I
7 don't see any, and I'm looking at Amy.

8 So Nate Lewis, peracetic acid and peroxyacetic acid.

9 SECRETARY LEWIS: All right. Peroxyacetic acid,
10 peracetic acid, PAA, is listed as disinfectant sanitizer and
11 medical treatment as applicable, 205.603(a)(24).

12 PAA, peracetic acid, is sort of the 2.0 version of
13 the substance Franklin weighed in on with hydrogen peroxide.
14 It's a mixture of hydrogen peroxide and acetic acid, which is
15 the acid in vinegar. But similar to hydrogen peroxide, it
16 breaks down into benign -- it quickly breaks down into benign
17 substances in the environment. It is also unstable, so it does
18 require the inclusion of some additional substances. These are
19 regulated by FDA and EPA as approved as sanitizers.

20 So I think it sort of maybe goes into maybe a fourth
21 bucket, Brian, of inerts, excipients, ancillary substances, and
22 then sanitizer stabilizers? I don't know. But in any event,
23 it remains necessary in livestock production. I personally
24 feel like there's a critical need for producers to have a suite
25 of sanitizing materials to help guard against resistance for

1 sanitizing on their farms, but I think with that, I'll handle
2 any questions.

3 I think there was one other thing that's in a similar
4 vein to what Franklin described with hydrogen peroxide being
5 used in cleanup. Peracetic acid has been effective in
6 degrading toxic compounds in lake sediments, which I think has
7 some interesting relevance to just its fate in the environment.

8 So with that, I'm happy to answer questions, but this
9 material remains necessary in production.

10 BOARD MEMBER CALDWELL: Questions for Nate?

11 Once again, another really important tool in the
12 suite of sanitizers. So great, thanks, Nate.

13 Nat Powell-Palm is going to do two at once, xylazine
14 and tolazoline.

15 BOARD MEMBER POWELL-PALM: I inherited these two
16 materials when we had a subcommittee switch around. So Amy got
17 us started off with these materials a couple of semesters ago.
18 And I really appreciate, again, kind of as a call out to folks
19 recruiting members and future members of the Board, Amy did a
20 really great job dissecting exactly what these materials mean
21 to the livestock community, even though she is not a livestock
22 producer.

23 And that's kind of the magic of the Board, with
24 someone who is -- this is not their expertise, being able to
25 get down and into the details enough to give us a

1 recommendation for where we want to see this go. Xylazine is
2 an anesthetic that's going to be used during surgical
3 procedures. And again, when I go back to our animal welfare,
4 I'm really glad that we have this material, so that if an
5 animal does need to have a surgical intervention by a
6 veterinarian, we have a tool to keep it so that we don't have
7 any incentive for producers to not have the necessary medical
8 treatment executed.

9 Tolazoline is what reverses xylazine, so they marry
10 up. Any questions?

11 BOARD MEMBER CALDWELL: Questions? I guess I have
12 just a quick comment, and that is that, again, so many of these
13 medical materials are used in such tiny amounts. You know, if
14 you took the whole country together, it might be, like, I don't
15 know, a pint or something. I don't know what. Something like
16 that, so that the environmental impact is almost always small.
17 And we do have to be on the guard for sort of repeated, non-
18 necessary use. But for operations, there's not going to be a
19 lot of that.

20 But yeah, so I just wanted to kind of point out that
21 the animal welfare aspect of this is so important, and the
22 environmental impact, and as far as we know, human health
23 impact is very small. So that's a positive for these
24 materials.

25 Any other comments? Oka.

1 Now we go back to Kim for oxalic acid and oxalic acid
2 dihydrate.

3 BOARD MEMBER HUSEMAN: I'm going to lean into what
4 you just said for just a quick minute, though, Brian. I grew
5 up on a farming ranching operation in southeastern Wyoming,
6 where we had 300 head of cow-calf pairs. It was conventional.

7 But as a little girl, my dad was pretty insistent
8 that we be free help. And so at 3 o'clock in the morning, in
9 the middle of snowstorms, we were out pulling calves. And so I
10 have a -- my mom, we'd go to the Z&W feed mill and pick up our
11 125 baby chicks every spring as well.

12 But my point to this is animal welfare and being
13 present and caring for animals is just a soft spot for me. So
14 you'll find that I'm a huge advocate for what we can do. I'm
15 just going to prelude here for the fall. What we can do for
16 these animals is, I think, very important. But one animal that
17 I'm not familiar with is bees. So Wyoming is not a large bee
18 production space.

19 And I kind of wish that oxalic acid dihydrate were
20 pushed into the next semester. And for all the people that are
21 wanting to be on the Board, you don't talk about excipients,
22 but if we can talk about how to control varroa mites in bee
23 production, this is one potential opportunity for that. And
24 then the other two are going to be coming up next year for
25 sunset.

1 So oxalic acid dihydrate is on the national list to
2 use as a parasite control for apiculture, so in the bee
3 industry.

4 The other two opportunities that have been presented
5 on the national list are formic acid. And the last one, I'm
6 going to forget how to say this, is SOEs, which is the sucrose
7 octanoate esters. Those two will be coming up for sunset on
8 the next session.

9 So this one is part of that. But to go back to it,
10 the oxalic acid dihydrate is used as a varroa mite control in
11 bee hives, as well as when you're moving bees. It is --
12 studies have shown that it's more effective than formic acid.
13 And there was an opportunity to remove the sucrose octanoate
14 esters from the national list. It's still on the national
15 list. More to come there.

16 But all of that to say that oxalic acid dihydrate
17 seems to be a choice, a top of the choice, for helping to
18 control the mites and bees. There were two comments for the
19 spring on this particular substance and both were supportive of
20 relisting.

21 That's all I've got on bees.

22 BOARD MEMBER CALDWELL: Yeah, looks like we have a
23 question from Wood.

24 BOARD MEMBER TURNER: Can you just give a quick
25 primer to those of us who are less connected to the livestock

1 activities sort of why the -- what's going on with the
2 apiculture standards within NOP?

3 BOARD MEMBER HUSEMAN: If someone has the full
4 rundown of this and would like to provide Wood a context, that
5 would be better than me.

6 Jared, do you have?

7 MS. HEALY: I can answer. So we currently have the
8 market development rule. These were -- apiculture was
9 initially kind of packaged as the third within that. It was
10 not included in the market development rule. It is on -- I
11 believe it's on the long term list. If we can double check
12 that, Jared, if you don't mind checking that real quick.

13 But we are not currently working on it. We did do
14 some research. It's an extremely complicated topic.

15 BOARD MEMBER CALDWELL: All right, so oxalic acid is
16 the acid that gives a bite to rhubarb. And formic acid is what
17 you smell when you step on an ant hive. So those are -- that's
18 just to know what these materials are that we're talking about.
19 Pretty common in nature, but used in a synthetic way.

20 Nate, yeah.

21 SECRETARY LEWIS: I just want to acknowledge that
22 despite the program's reluctance to move forward on rulemaking,
23 there remains organic honey in the marketplace. So whether a
24 standard or not, I don't want that to be used as a
25 justification for leaning in a sunset direction or a removal

1 from the national list. These remain, in my opinion, necessary
2 substances to produce organic honey, even in the absence of a
3 formal standard for apiculture.

4 BOARD MEMBER CALDWELL: Thanks, Nate. Yeah, good --
5 really good point. Okay. This should be a fun one.

6 Nate Powell-Palm is going to talk about methionine.

7 BOARD MEMBER POWELL-PALM: Thanks, Brian. When I was
8 21, I came from Montana where we really don't have chickens.
9 So I did some inspections in the Midwest, kind of on the
10 Iowa/Illinois border. And I saw my first house of about 7,500
11 birds. And I was just so excited reading that OSP, being like,
12 what could this possibly look like? I've only ever seen these
13 barns from the outside. I've never gone inside.

14 And the thing that struck me most about walking that
15 barn for the first time was just how clean it smelled. That I
16 went to school in Iowa, I had always heard my friends blaming
17 the chicken houses for why it stunk so bad. And I could say,
18 that's not organic's fault. Organic is doing it right.

19 And I think that when we look at the materials that
20 enable us to provide a house that has ammonia management, a
21 house that is going to have comfortable birds that are not
22 pecking each other, that are giving the time and consideration
23 for how do we, again, treat these partners in food production
24 rights. Methionine is one of those near magical substances
25 that we have to help make sure that we're executing animal

1 welfare to the highest potential possible.

2 And so as a central amino acid, because we're not
3 able to provide all of our birds all of the insects that they
4 would need, to also expect them to produce 300 eggs a year, we
5 have this helper. And this helper is really -- I see it as a
6 catalyst for making sure we can do everything else really well.
7 Any questions on methionine?

8 BOARD MEMBER CALDWELL: Nate?

9 SECRETARY LEWIS: I don't have a question. I have a
10 comment.

11 BOARD MEMBER POWELL-PALM: Please.

12 SECRETARY LEWIS: So I sit in the resource
13 conservation seat for my day job, working with the Washington
14 Farmland Trust in aiming to preserve one of agriculture's most
15 critical resources, which is farmland. But when I'm not
16 working doing that, I'm working on my own personal farm. I've
17 been an organic broiler and layer producer for over 20 years in
18 Olympia. And this last winter was the first year that we
19 decided to fully confine our laying flock indoors for
20 environmental concerns.

21 We sit on Puget Sound. I look at the world's largest
22 shellfish producer. And water quality is critically important
23 to me and my neighbors.

24 We also had a really serious outbreak of avian
25 influenza that is now showing to be expanding into other

1 species and into humans. And we just felt that it was our
2 responsibility to confine our laying flock.

3 I'm also trying to keep feed costs down as protein
4 prices rise. And one of the ways I'm doing that is by sourcing
5 local grains from my community and doing a small-scale
6 fermentation of those whole grains rather than grinding them.
7 That makes up about 30 percent of our ration, I'd say.

8 And what I noticed was when this approved and
9 compliant confinement occurred, and I would continue to feed
10 these grains, we were observing some of the behaviors that we
11 have heard from producers around what a methionine deficiency
12 looks like. That's nervousness, feather pecking, et cetera.
13 Once I added a premix, those symptoms went away.

14 So I think that experience underscored for me the
15 necessity of having methionine on the national list. But it
16 also got me thinking about whether or not the current
17 annotation serves us. Two pounds is an arbitrary number. It
18 has no basis in science. It luckily has been working for the
19 industry is what I hear, based on the ability to average that
20 over the lifespan of the flock. So I'm encouraged by that.
21 But it doesn't resolve the issue that it's an arbitrary cap.
22 It has no connection to science.

23 And I just want the Board to -- I want to challenge
24 the Board to think about annotations around how does it serve
25 the community. Is this really moving the needle or is this

1 just providing another hardship for producers who don't need
2 anything else? So I'm going to be working with the livestock
3 subcommittee to consider bringing forward a parallel proposal
4 without the annotation on methionine for the fall meeting. And
5 I just wanted to share that with the community so that they're
6 aware that that's something that I'm going to be pursuing in the
7 subcommittee level, that conversation and that potential.

8 BOARD MEMBER CALDWELL: Yeah, Kim.

9 BOARD MEMBER HUSEMAN: Nate, looking forward to this
10 next semester on the livestock subcommittee. It's going to be
11 a fun one. I think another component to this in listening to
12 the community about the high level of soy that's provided in
13 the diet to try to get to a certain amino acid profile, you
14 know, looking at -- we have this as a research priority too,
15 but looking at alternative protein sources to help bring about
16 a better amino acid packaging. So we did hear from the
17 community that there's not a lot of organic sunflower meal
18 production in the U.S. I want to challenge that a little bit.

19 Canola meal, some other alternative proteins that
20 aren't a one-for-one replacement or a solution wholeheartedly
21 -- holistically, but a part of that solution package too. And
22 really putting some emphasis on what we can do as a community
23 to support other protein production meal products.

24 BOARD MEMBER CALDWELL: Great. So, Wood.

25 BOARD MEMBER TURNER: Thanks. I want to just

1 acknowledge, first of all, what I'm going to miss, obviously,
2 we're leaving the Board at the same time, but the storytelling
3 that you guys do to sort of help bring this livestock to life
4 for those of us who aren't as close to it is meaningful.

5 And Nate, you've got to -- Nate Lewis, you've got to
6 pick up the pace here in your storytelling because these guys
7 are pretty good at it.

8 I just want to acknowledge, and I'm jumping ahead a
9 little bit to research priorities, but I just want to
10 acknowledge that this has always been on the research
11 priorities list, natural alternatives. And I just want -- can
12 you put this -- can you put that in context? I know you just
13 -- I think you just addressed it, Kim, if I'm not -- if I was
14 hearing you correctly, just in terms of sort of what is the
15 research potential here? Like what is happening in this space?
16 Is it -- I mean, I always ask the question, and again, I'm
17 getting into a different subcommittee here, but why not do it
18 now?

19 You know, are these things -- are these priorities
20 that just stay on the list because they just stay on the list
21 because we want to see something happen and we're waiting for
22 somebody to sort of step up and do the research, or is there --
23 is there something happening here?

24 And I just -- I'd love for one of you to just address
25 that, if you don't mind.

1 BOARD MEMBER POWELL-PALM: I think over the last, oh,
2 I'd say two years, Kim and Amy and other folks on the Board and
3 I have had a series of discussions around both the pressures
4 placed on feed prices, now the pressure placed on low grain
5 prices, and the question that I think Dr. Benbrook articulated
6 so well that we need more crops in our rotations.

7 And so we've been asking the question, what -- it's a
8 lot harder to make a novel food product from a, you know,
9 quirky crop than it is to just feed that crop to, say, a
10 chicken and make something that everybody loves. And so as
11 we're thinking about the research priorities, building on what
12 Kim was saying, we have the potential to feed so many different
13 crops that are so agronomically helpful to chickens or to dairy
14 cows or any other livestock.

15 And so I think we've evolved a bit in this
16 conversation for not necessarily just where do we find
17 alternative sources of methionine, but how is methionine a
18 catalyst for realizing a much more diverse landscape for the
19 feed production that we're doing for these animals. Building
20 off of soybean meal, I look at southeast Wyoming right now that
21 has a glut of millet, a great livestock feed, but not enough
22 nutritionists who are brave, telling their clients, try out
23 this in the ration or try out a different crop in the ration.

24 And I hope with the research priorities, we're able
25 to grab those feed researchers and try to figure out how to get

1 more of these ideas for how can we make really good balanced
2 rations out of a much more diverse range of crops so that we
3 can help those grain producers marry up this goal of a more
4 diverse landscape that results in a more resilient system that
5 we've all been talking about.

6 BOARD MEMBER HUSEMAN: If I'm going to add on to that
7 a little bit, Wood, I always like to use the imagery of if you
8 are a grocery shopper and you're tasked with going into a
9 grocery store to buy ingredients to make a cake, the
10 ingredients that you buy versus the ingredients that I would
11 buy might be different, but they both will make a cake.

12 And I'm not trying to underscore the education, the
13 depth of knowledge, and the expertise of a nutritionist, but
14 that's how I always looked at a nutritionist is their goal is
15 to provide a well-balanced, highly effective diet for the
16 animal, and generally that's at being conscious also of cost.

17 And there's a program called Concept Five. There's
18 more programs too. And they'll set limitations of, we can put
19 this amount of this product in, we can put this amount of this
20 product in, how do we get to this finalized diet?

21 And I'm not saying that alternative protein sources
22 are the 100 percent solution, because they're not. There's
23 still synthetics that have to be involved or animal byproducts,
24 which animal byproducts are not allowed in organic diet. It's
25 a veg fed program. But I'm just saying that there's a

1 multitude of ways to get to a solution to help create a stable
2 environment, a more stable environment where grain prices are
3 stabilized, where producers feel like they're in a stable
4 market, that there's availability within their sector, and that
5 there's ways that we can bolster this community of domestic
6 production to be self-sufficient. And all of these pieces are
7 super important to that.

8 And I think Nate's comments and what we're going to
9 work on this semester is a piece of that puzzle too. And my
10 goal is to help provide a stable organic environment in the
11 U.S. that the farmer, the producer, and the consumer can all
12 feel comfortable about.

13 BOARD MEMBER CALDWELL: Great, thanks. Allison.

14 BOARD MEMBER JOHNSON: Thank you. I think with so
15 many of these materials, we're weighing trade-offs and at the
16 risk of continuing the trend of sharing information that's only
17 interesting to the speaker, I'll just mention, I'm doing a lot
18 of work on reducing neonicotinoid use, and was recently looking
19 at the Environmental Protection Agency's analysis of impacts of
20 neonics on endangered species.

21 And one of the major environmental sources is poultry
22 litter. And so, being the food nerd, I go, why in the world
23 are there neonics on poultry litter? And it's to control a
24 beetle that can spread diseases. And so, of course, Google,
25 how do organic producers deal with this beetle? And it's

1 keeping the poultry house clean and using a lot of
2 environmental controls.

3 So it's an insect that could be a source of nutrition
4 that the chickens like to eat, but it also introduces disease
5 risks and a lot of other concerns. So this is one where
6 looking at insects is a great option, looking at other grains
7 is a great option, and then continuing to have this mix of
8 options, I think, makes a lot of sense, because the trade-off
9 is more pesticide use, more other materials that are really
10 concerning.

11 BOARD MEMBER CALDWELL: Thanks, Allison. Yes,
12 Carolyn.

13 BOARD MEMBER DIMITRI: Just to bring this back to
14 your explicit question, Wood, which was about research
15 priorities and how this is playing out. And when I was at the
16 project director's meeting last week, there was a scientist
17 from ARS who's working in a team and they're actually working
18 on this particular problem and it's in development. And I
19 already promised Nate Lewis that I would send along any
20 publications and his contact information.

21 BOARD MEMBER CALDWELL: That's fantastic. That's
22 good news.

23 Any others? Okay.

24 Well, I think I'm up for trace minerals. And trace
25 minerals are synthetics that are used in small amounts, mixed

1 with feed rations or fed free choice to basically balance and
2 strengthen the rations that animals get. And so from this,
3 what we've been talking about earlier, they have a small
4 environmental impact. And in fact, they make the manure from
5 livestock operations actually have a better balance of
6 micronutrients than if they weren't fed, which is something
7 that I used to think about as a vegetable producer. They're
8 allowed by Canada, the EEC, Codex, IFOAM in Japan. Canada
9 makes the explicit annotation that they must be without EDTA or
10 EDDHA, which are chelating agents, and we'll be talking a
11 little bit more about those later on in the meeting.

12 In terms of our written comments, we had quotes like,
13 almost all producers use these and "essential" were comments
14 that people gave. Five comments were in favor of relisting.
15 Zero to delist. But a few of the relisting comments were
16 requesting an annotation to restrict the usage to situations
17 where the forage was poor quality. And my just quick comment
18 on that, my personal comment on that is that I think that would
19 be really hard to enforce or oversee and not sure that it's
20 super productive.

21 But anyways, I think that's covering it. Any
22 questions on trace minerals?

23 All right, and now I will move along to vitamins.

24 And kind of similar in some ways to trace minerals,
25 basically used in feed rations to enrich them and make them a

1 really good full balance for the livestock. They are synthetic
2 and used relatively in small quantities again.

3 In the written comments, five were in favor of
4 relisting. And there were several comments that pointed out
5 that vitamins B and K are not really needed by ruminants
6 because they are produced by bacteria in the digestive process.
7 So there's no current annotation about vitamins B and K.
8 There's no restriction for their use, but that is something to
9 think about.

10 Vitamins are allowed, again, by all the other
11 certification programs that we check: Canada, EEC, Codex,
12 IFOAM, and Japan. However, there's a big issue with vitamins
13 that we're, again, this is the kind of thing that we're going
14 to run into more later on in this meeting. But there was a TR
15 request for vitamins, asking about whether excluded methods
16 were used in the production of vitamins.

17 And we received the TR after these reviews were
18 written, and I don't think they've been posted yet online. But
19 the spoiler alert is that several of our vitamins do have high
20 probability of having excluded methods being used in their
21 production. And those are three of the B vitamins: B2, B8, and
22 B12, vitamin C, and vitamin E.

23 And so we're going to really have to work on this one
24 for the fall, and that TR will be available for you all soon.
25 And so we'll be looking forward to a lot of comments on that.

1 So what would normally be a slam dunk, in my opinion, is maybe,
2 you know, some questions about it.

3 Any questions from the Board about that? Allison.

4 BOARD MEMBER JOHNSON: Thanks, Brian.

5 I don't know, I think what you just said about FDA
6 answers the question that I was forming, but I'll just
7 highlight tomorrow in handling, we'll be talking about nutrient
8 vitamins and minerals, which is one listing for handling. It's
9 interesting that it's broken into trace minerals and vitamins
10 for livestock, and I think the annotation here is a little bit
11 clearer as far as looking to specific food additive
12 regulations. The handling one is sort of like, if it seems
13 like a good idea to you. It seems like that is actually kind
14 of working okay in handling, but yeah, be curious, and we
15 should make sure that we have some alignment and strategy in
16 how we deal with these.

17 BOARD MEMBER CALDWELL: Great, thanks, Allison. And
18 Nate Lewis.

19 SECRETARY LEWIS: Oh, I was just going to mention
20 that I think they're broken out because of the way that AAFCO,
21 the American Association of Feed Control Officers, identifies
22 the materials. And so, yes, there's a little more definition
23 in the live -- it's sort of ironic, I suppose, if that's the
24 right word, but that there is a little more definition and
25 clarity around what you can feed livestock than there is around

1 what you can feed humans.

2 BOARD MEMBER JOHNSON: Yeah, I was having that
3 reflection as well. I'm like, wow, there's actually pretty
4 clear rules for animals, but not people. Sounds like FDA.

5 BOARD MEMBER CALDWELL: Okay, more questions about
6 vitamins. Well, now, for a quick sneak peek, we'll have Nate
7 Powell-Palm and Kim Huseman talk briefly, because we're coming
8 up to our break, about meloxicam.

9 BOARD MEMBER POWELL-PALM: Yeah, that's great. We
10 received a petition, and I think the thing I found most
11 remarkable was in -- I've gotten -- I've learned more about the
12 business of food over the last few years and how competitive it
13 is. And so when I saw who was petitioning for this material,
14 it was basically the entire organic dairy industry and folks
15 who had obviously figured out how can we, for the betterment of
16 the animals that we're serving and partnering with, identify
17 ways to improve animal welfare.

18 And so hearing from those really well-researched
19 companies who provided the petition for meloxicam, Kim and I
20 spent weeks just poring over all of the data, the incredible
21 amount of resources that they provided; and thinking, it's just
22 incredible timing, kind of at this semester in Livestock
23 Subcommittee to be thinking again about animal welfare. Are we
24 making it so that we can reasonably say we're doing all that we
25 can to provide pain relief to these animals?

1 And when I think about, and Carolyn's going to side-
2 eye me as I maybe cry, but when I think about the sort of
3 extraordinary act that dehorning a baby calf is, I just can't
4 think that there's enough pain relief, that we can ever do
5 enough to really provide a meaningful justification, excuse,
6 help to get this animal through that. But as we've heard, it's
7 a necessary procedure. And so, the more tools we have in the
8 toolbox to provide relief, I think it's our obligation to
9 consider it.

10 And I am really excited to spend the next semester
11 thinking about how do we consider this material for use in
12 organic? And are we -- should we be looking for even more?
13 How do we, as a community, assure ourselves, assure our
14 customers that we are doing everything we possibly can to
15 better animal welfare?

16 BOARD MEMBER HUSEMAN: So, I'll just add to that. So
17 on -- whoops, I knew I was going to lose this. It was posted
18 to the federal, oh, thank you -- it was posted to the federal
19 registrar April 23rd, I believe, the petition for meloxicam to
20 be added to the national list as a pain reliever in livestock.
21 As Nate mentioned, it was submitted by industry folks in the
22 dairy community from a multitude of organizations and included
23 a significant amount of detail to it. And it's been mentioned
24 in public comment several times.

25 So if it was confusing, like, where did meloxicam

1 come from? It's not on any of the work that we've been doing.
2 It was posted, like I said, after the close of being able to be
3 added to the spring semester. But it's something that we want
4 to put a lot of emphasis on over the summer to see where we can
5 go with pain management for the livestock community.

6 BOARD MEMBER POWELL-PALM: The only thing I'd throw
7 on there, and it should build on what Kim said, lots of times
8 we receive petitions from manufacturers who want to sell
9 something. And I thought it was fairly remarkable that really
10 no one of the petitioners are going to financially benefit from
11 its use. It's straight up a means of trying to improve the
12 states, the condition of dairy cattle.

13 BOARD MEMBER CALDWELL: Great. Well, thanks so much,
14 you two. And we are glad that you're going to be on the case
15 for a little while here.

16 So I want to thank the Livestock Subcommittee for all
17 their hard work, and thank you all for your questions and
18 comments. And Kyla, I'm going to turn it back to you.

19 CHAIR SMITH: Great, yep, I just want to echo that.
20 I feel like sometimes livestock hasn't had some interesting
21 things to work on, and it sounds like now you do. So that's
22 awesome.

23 We're going to take a break. We're going to come
24 back at 10:35. And I'm going to try to keep us on track. So
25 see you at 10:35.

1 (Recessed at 10:23 a.m.; to reconvene at 10:36 a.m.)

2 CHAIR SMITH: Okay, everybody, we're going to get
3 started. Okay, up next, we are going to move to the Materials
4 Subcommittee, and I'm going to turn it over to Franklin. He's
5 the Materials Subcommittee Chair.

6 BOARD MEMBER QUARCOO: Thank you. Welcome,
7 everybody, to the Materials Subcommittee session of today's
8 activities.

9 We have one proposal and two discussion documents.
10 The proposal is on a technical review template update that will
11 be led by Mindee. And we have a research priority session that
12 will be led by Wood. And then an in-depth ingredients part of
13 our work that will be led by Nate.

14 So I'll go over to Mindee.

15 BOARD MEMBER JEFFERY: Thank you so much, Franklin.
16 I really appreciate the Materials Subcommittee and all the work
17 that everyone has done to bring forth this effort. I
18 appreciate the program. I appreciate the technical review
19 folks.

20 First, I'd like to look if we can take the slide down
21 to the vote. Thank you so much.

22 And looking at that vote, that is one of the most
23 tragic typos I have ever made in my life. So I beg your
24 forgiveness in that the Materials Subcommittee is 100 percent
25 clear that nobody voted no on this initiative, and that is an

1 absence. You can see it reflected in the notes from February
2 when they're posted. And again, that one hurts my feelings,
3 and I apologize.

4 So the Materials Subcommittee has been engaged with
5 the topic of updating the technical review template for two
6 years. The first draft was a compilation of the feedback we
7 received from the community that creates the technical review
8 for us when we request information. In this version, the
9 additional questions in the template are direct suggestions
10 from stakeholders who engaged with the discussion document.

11 In our discussion as a full Board, we externalized
12 our clarity that the TR template is a tool for the Board and
13 can be updated without a proposal. In the interest of
14 collaboration, we brought the document forth for another round
15 of comment.

16 An important note reiterated by stakeholders in
17 written comments, technical review is an NOSB mechanism for
18 upholding our mandate. The NOSB Policy and Procedures Manual
19 states a subcommittee cannot proceed with a recommendation to
20 list a material if it is determined that there is insufficient
21 valid scientific information on that material's impact on the
22 environment, human health, and its compatibility with organic
23 principles.

24 In this round of comments, oral and written, we have
25 some support from certifiers in the public comments, concerns

1 from a material review perspective, and requests for more time
2 to evaluate the implications of the additional questions in the
3 template.

4 There are also some very specific suggestions which
5 materials can consider. There were many comments from
6 different sectors of our stakeholder community in full support
7 of this version of the template. The technical review process
8 is a tool for the Board to make recommendations.

9 We engaged in a long process around this update
10 because we are interested in collaborating with other entities
11 and how the technical reviews are informing organic decision
12 making. Specifically in regards to excluded methods, we
13 understand that the biotech industry and the proliferation of
14 new technologies in the food system without peer-reviewed
15 safety testing, like the evaluation on novel proteins, looking
16 at this issue and asking these questions is the task at hand
17 for the Board. We've been requesting unanimously for many
18 years through the public process of stakeholder engagement in
19 line with the mission of the NOSB on how, from an
20 infrastructure perspective, to be the leader in GMO disclosure.

21 This is the ask from the consumer. The excluded
22 methods question are geared towards the now of the Materials
23 Subcommittee's intention to tackle fermentation and the
24 enormity of technological developments entering the food system
25 across all of our subcommittees.

1 I encourage everyone to reread the public comments
2 from Friends of the Earth. Without overarching federal
3 engagement towards organic schools of transparency, we sit
4 facing a whole new set of challenges with great potential to
5 disrupt the organic marketplace. I do not want to go through
6 another 15 years of explaining to the consumer the enormity of
7 what organic is offering the food system beyond non-GMO. I do
8 not want to have to contextualize how we go about explaining
9 how we protect ourselves from biotechnology because it's so
10 deep in the weeds of who we are as an organic system, it's
11 nearly inaccessible to their understanding, and we build their
12 trust on transparency and consistency.

13 I witnessed very painfully brands choosing natural
14 over organic because they felt like the butterfly seal was
15 enough to make it in the marketplace. I don't want to live
16 with the backlash of what will happen to the organic
17 conversation if we are not out in front of these issues.

18 This technical review process can demonstrate the
19 Board's work with great confidence, addressing consumer
20 concerns around biotechnology and many other areas of technical
21 review that is our mandate under our criteria under the law.

22 The template provides transparency for material
23 review process towards sound NOSB recommendation while leaning
24 into consistency in our review processes.

25 I'm happy to hear all your questions.

1 BOARD MEMBER QUARCOO: Thank you. Brian?

2 BOARD MEMBER CALDWELL: Yeah. Mindee, I wonder if
3 you could just say a few words about transparency or the lack
4 of it in terms of government labeling requirements and that
5 kind of thing or government sharing information or not,
6 requirements for maybe some of these new technologies.

7 BOARD MEMBER JEFFERY: Well, I don't see the
8 government in any agency providing us with transparency around
9 where biotechnology appears in the food system. I think the
10 USDA recently said, you don't have to disclose CRISPR in seeds.
11 So issues like that.

12 And then like -- and what's really hard for a
13 consumer to know, like you see it a lot in the conversation
14 between brands. Like one brand's a non-GMO brand and the other
15 brand clearly has some of these novel proteins, but the
16 consumer doesn't know that. And so there's often mistakes
17 going on. And so it's really hard to read the systems and
18 really hard to find these technologies.

19 And I feel like the consumer is asking organic to do
20 this work for them. And I see it as a job that the government
21 should do as a public trust. That like transparency in the
22 food system and transparency at evaluating new inputs in the
23 food system should be something that we should accept and know
24 about. But I don't see it out there.

25 So like the Impossible brand is generally recognized

1 as safe, but my understanding is they self-declared, because
2 when the FDA looked at their protein list, they only submitted
3 one protein and there was 42 other proteins and they said, you
4 guys have more proteins there and Impossible said, oh, I can
5 back out and self-declare.

6 So it's a really complicated regulatory system out
7 there that doesn't lend towards transparency in any predictable
8 way. So that's why organic has to do this work because we have
9 the excluded methods prohibition and we have to do this work of
10 discovery for ourselves.

11 To my understanding, this is the only way we can do
12 this work of discovery is through this technical review
13 process.

14 BOARD MEMBER CALDWELL: Great, thanks. So just to
15 kind of filter it down in my brain, previously with some of the
16 more classic GMO traits, like Roundup resistance, glyphosate
17 resistance, the government required extra testing and
18 identification of those in say even seed identification. But
19 now with some of these new techniques, CRISPR is one that you
20 mentioned, that is not going to be clear necessarily to the
21 casual observer and sometimes even to the close observer.

22 So that's kind of what's -- one of the big changes
23 that's happening now in addition to the just general
24 proliferation of new techniques. So great, thank you.

25 BOARD MEMBER QUARCOO: Allison.

1 BOARD MEMBER JOHNSON: Thank you. Mindee, thank you
2 for your dedication and patience and work on this proposal. I
3 know it's been a long time coming and has taken a lot from you.
4 So we're grateful to you for seeing it through.

5 This is going to get tricky. I think -- I was just
6 pulling up the number. So when the original NOP rules were
7 proposed in 1997, they got 275,603 public comments, which at
8 the time was the highest number of public comments USC had ever
9 gotten. And a lot of it was because people wanted to keep the
10 big three out: so GMOs, sewage sludge, irradiation. And those
11 continue to be, I think, really fundamental pillars of the
12 organic rule.

13 But GMOs are getting complicated. Excluded methods
14 are getting complicated. And the only way that we can remain
15 diligent in doing our job and setting lines in a thoughtful,
16 science-based, and proactive place is if we have information
17 about what's going on.

18 So I think we heard in public comments that it's
19 going to be hard. There may be acknowledgment of gaps in
20 information, like walls that we hit up against, but at least
21 knowing where those places are, even that is informative. So I
22 think the proposal's in great shape and I'm really grateful to
23 you for bringing it forward.

24 BOARD MEMBER QUARCOO: Nate.

25 BOARD MEMBER POWELL-PALM: Oftentimes I feel like on

1 podcasts where folks don't know what organic is and they're
2 trying to explain it to each other, you hear this confusion
3 about GMO. I mean, I feel like -- and it's embarrassing to
4 admit, but my own -- members of my own family have often said,
5 GMO is always organic, but organic isn't always GMO; is that
6 right? And I'm just like, if those are my people saying that,
7 how much work do we have to do? To be able to say that from
8 the beginning we had this very lucid in our minds, what is the
9 obligation that we owe to consumers for transparency? And
10 that's a huge point and selling point for our market.

11 I really appreciate this proposal, really appreciate
12 the work you did, but I wanted to say that I don't think we've
13 given you enough credit for having such a close understanding
14 of what consumers are asking of us. And I think that is the
15 heart of the retailer's seat for understanding where are
16 consumers and how can we try to do everything we can to meet
17 their expectations.

18 So thank you for leveraging those 15 years of insight
19 to bring us this great work. And it was not an easy lift,
20 appreciate it.

21 BOARD MEMBER JEFFERY: Yeah, thank you.

22 I had a lot of fun in October for a really long time,
23 making up games to play with the customers about, you know,
24 what's the difference and what are we talking about here? And
25 so, you know, it was fun in a lot of ways because the

1 contentiousness of this issue really made me have to explain
2 organic in so many different ways.

3 And customers had a lot of fun. They would come into
4 the store and say, we want to outsmart a good earthling. We
5 have a question. And groups of them with their kids and people
6 would come upstairs and be like, Mindee, somebody wants to take
7 you down. Can you answer this customer question? So it is
8 fun.

9 And I do really appreciate the opportunities I've had
10 to just talk to people about this, but it is so painful
11 watching the marketplace not understand the beauty of the
12 organic system and our opportunities in democracy with this
13 regulatory framework. So thank you.

14 BOARD MEMBER QUARCOO: All right. I have a queue
15 going here. Amy, Nate, Jerry, and Kyla.

16 Amy.

17 VICE CHAIR BRUCH: Thank you, Franklin.

18 Mindee, thank you so much for your tireless efforts
19 in keeping excluded methods in the conversation so organic can
20 keep them out of our program. So thank you so much for all
21 your work.

22 Couple of things. I do share the same sentiment as
23 Nate Powell-Palm with my social circles. There is still
24 confusion about the difference between organics and non-GMO,
25 and we need to clear that up.

1 I did notice on Erin's presentation yesterday with
2 some of the marketing information that's extraordinary for the
3 conversation of organics, we do state non-GMO under one of the
4 pillars, that organic is non-GMO. So I think we owe it to the
5 community to keep this in the spotlight, and I appreciate that
6 you're doing that.

7 Can you highlight -- I believe there was, we didn't
8 have this formally approved as a standard, and that's I know
9 what we're discussing right now, this proposal on updates to
10 the technical report, but I believe handling leveraged some of
11 the questions that are proposed in this full rollout this round
12 for some of their sunset reviews.

13 Could you talk about some of those questions that
14 were asked in handling and the results of receiving that
15 information?

16 BOARD MEMBER JEFFERY: Yeah. I felt like we did a
17 lot of strategy across subcommittees with our technical review
18 requests, sort of proof of concepting these extra questions for
19 ourselves. And so there was vitamins, microorganisms, yeast
20 and enzymes, and citric acid. And so I felt like it was a
21 really diplomatic way to get a lot of people on the Board
22 looking at these questions and looking at the results of the
23 information that we got.

24 And so I was really happy with that cross-
25 collaboration and with that level of investigation into the

1 requests that we're making. So I'm really happy that we got to
2 do all that. And I'll just say, Alison or Brian, as the
3 Handling and Livestock Subcommittee chairs receiving those TRs,
4 did you want to say anything about that or --

5 BOARD MEMBER D'AMORE: I'd be happy to, but we'd have
6 the same conversation again in a couple -- well, tomorrow at
7 this time, and I'll take any lead that you give me. I just
8 want to lend my voice to the work that Mindee's done and the
9 passion. I can't elaborate because I'm just flat overwhelmed.

10 Thank you. So I can speak to -- I think we have a
11 huge issue. I think the TR, particularly the one for
12 microorganisms, enzymes, and yeast helped us see that very
13 clearly. And for me, it was particularly painful to go through
14 that simply because I do not have some of the background that
15 other folks have in terms of certification and inspections and
16 all.

17 When I got that TR to look at, it freaked me out. I
18 needed help from my own subcommittee to get right about what I
19 was looking at and to put it into context. It's that
20 complicated and, for me, that important.

21 BOARD MEMBER JEFFERY: Same, Jerry. I can't do this
22 work without the level of experience that we have on this Board
23 and collaborating. Totally appreciate so many people in that
24 way.

25 SECRETARY LEWIS: And I'll offer -- I'll dive into it

1 a little more when we do the citric acid sunset report out
2 tomorrow, but just for the purposes of this subcommittee and
3 moving this proposal forward, I just want to acknowledge that
4 we, as the Board, use these TRs to evaluate substances that are
5 petitioned and as part of our legally required duty in the
6 sunset review, but these TRs are also used by primarily
7 certifiers who are the front lines of our non-GMO claim.
8 They're the ones making sure every seed planted on an organic
9 farm is a non-GMO seed.

10 They're the ones making sure every ounce of citric
11 acid used in a formula to keep your pesto green is made from a
12 non-GMO source, et cetera. So the more information that we can
13 provide to certifiers to make sound decisions, I think the
14 better. And I think in the citric acid sunset exercise where
15 we incorporated some of these questions as a trial, we got a
16 lot more information. And I am hoping that that additional
17 information will make certifiers' jobs easier in saying yes and
18 no to particular formulas within the context of an operations
19 system plan.

20 I think that underscores a commitment that I'm
21 willing to make as a second year on the Board and I will be
22 here for three more years after this, that this isn't carving
23 the TR template into a stone tablet. This is a necessary
24 update, and it's something that I personally commit to
25 revisiting should the impacts of these additional questions and

1 the information they yield be problematic for the certification
2 community and their evaluations of systems plans.

3 So this is not, yeah, again, carving into the stone
4 tablet of TR templates, this is an iteration and a continually
5 evolving effort to keep GMOs out of organic and substantiate
6 that claim that we hold dear to the industry.

7 BOARD MEMBER QUARCOO: Thank you. Kyla.

8 CHAIR SMITH: I'm jumping on the Mindee praise
9 bandwagon, but I also wanted to just say that information
10 related to these extra questions that have been added has been
11 previously provided in TRs, not to the depth and level that we
12 will get now, but it's been there. And so it's not that this,
13 I don't know, information hasn't been known, it has.

14 I want to echo Nate's point about certifiers using
15 the TR templates, and that -- especially in cases where
16 something isn't black and white. I mean, we live in the grey a
17 lot. And we heard from public comment that that is when this
18 additional information is most valuable to certifiers to create
19 those consistent decision-making around exclusion methods in
20 material review.

21 And we have more work to do, like we have more things
22 to figure out because we need to have more policies and
23 procedures, particularly related to fermentation. And I know
24 that that's something that the Materials Subcommittee wants to
25 work on.

1 So, yeah, I just am echoing, I think, that we can
2 move this forward and we will keep evolving, and I appreciate
3 your diligence.

4 BOARD MEMBER QUARCOO: And one last question from
5 Dilip.

6 BOARD MEMBER NANDWANI: Thanks, Franklin.

7 It's not a question, it's just a comment what other
8 fellow Board members have said that I echo. You know, thanks,
9 Mindee, for your leadership on this one.

10 And I would say that this is very timely, because
11 we've been dealing and discussing a lot of -- some of, if not a
12 lot, challenging materials and let's say excluded methods. So
13 this is very timely. I'm not sure when was the last we updated
14 the TR.

15 When I review my materials, I read sometimes TAP, I
16 think, and now and then we say TR, and I'm not sure when was
17 the last TR was reviewed. So this is really, very timely. So
18 thank you for leading on that, I appreciate that.

19 BOARD MEMBER QUARCOO: Yeah. Yes, I made a mistake
20 of leaving my comments about Mindee's to the end, so now I have
21 to follow everybody else. And Mindee is one of the most
22 persistent and unwavering people I've met, and especially on
23 this issue of TRs and excluded methods.

24 And when I got on the Board, she quickly drew me
25 close, started teaching me the ropes. I still don't know my

1 way around. I'm still groping in the TAP, she's still helping
2 me.

3 But I 'm sure it's going to be an ongoing process.
4 And Wood, who is about to go for their research priorities, has
5 also been showing me the ropes, and I'm very grateful.

6 So that takes us to the discussion document session.

7 CHAIR SMITH: We've got to vote.

8 Okay, first vote. So give me a minute, I've got to
9 put my glasses on.

10 So this -- can you make the slide bigger on the
11 screen, please? Thank you so much. Okay, so this motion comes
12 to the full Board from the subcommittee.

13 Motion to accept the proposal on TR template updates
14 for handling and crops and livestock. It was motioned by
15 Mindee and seconded by Nate. We're going to start the voting
16 with Kim.

17 BOARD MEMBER JEFFERY: Do we need a motion to go to
18 the vote now on this proposal?

19 CHAIR SMITH: I don't think so. It comes, motioned
20 and seconded.

21 Okay. Yes, Nate?

22 BOARD MEMBER POWELL-PALM: You betcha.

23 CHAIR SMITH: Dilip?

24 BOARD MEMBER NANDWANI: Yes.

25 CHAIR SMITH: Franklin.

1 BOARD MEMBER QUARCOO: Yes.

2 CHAIR SMITH: Nate Lewis.

3 SECRETARY LEWIS: Yes.

4 CHAIR SMITH: Allison.

5 BOARD MEMBER JOHNSON: Yes.

6 CHAIR SMITH: Brian.

7 BOARD MEMBER CALDWELL: Yes.

8 CHAIR SMITH: Jerry.

9 BOARD MEMBER D'AMORE: Yes.

10 CHAIR SMITH: Carolyn.

11 BOARD MEMBER DIMITRI: Yes.

12 CHAIR SMITH: Wood.

13 BOARD MEMBER TURNER: Yes.

14 CHAIR SMITH: Mindee.

15 BOARD MEMBER JEFFERY: Yes.

16 CHAIR SMITH: Logan.

17 BOARD MEMBER PETREY: Yes.

18 CHAIR SMITH: Amy.

19 VICE CHAIR BRUCH: Yes.

20 CHAIR SMITH: And the Chair votes yes.

21 SECRETARY LEWIS: 14 yes; zero no; one absent. The
22 motion passes.

23 CHAIR SMITH: Back to you, Franklin.

24 BOARD MEMBER QUARCOO: Okay. So we move on to recite
25 priorities for 2024. I hand over to Wood.

1 BOARD MEMBER TURNER: Thanks. I -- you know, I just
2 didn't join the chorus on that last round, but I just wanted to
3 say I -- you know, I'm reminded every day that this is -- what
4 we're doing is imperfect. It's always been imperfect. And as
5 one of the foundational documents of this country, we're always
6 on the quest to be more perfect. So I appreciate what we just
7 did, and I appreciate where we're going, and so many different
8 things, including research priorities.

9 It's an imperfect process. I've said this several
10 times over the last several years in terms of trying to think
11 about how to make this document more useful, less perfunctory,
12 more reflective of changes that are happening, more reflective
13 of new perspectives. And, you know, I think we continue to do
14 that. And I think, you know, part of having worked on it now
15 myself in this subcommittee for a couple of years, I sort of
16 feel I'm getting more and more clear about it. More and more
17 perfect, I guess. Not anywhere close to that yet, but trying
18 to.

19 So, you know, we've done a few things this time that
20 I think are reflecting that. One of the things that you all
21 know is that we've tried to add something to the mix here that
22 I really want to say my appreciation to Brian for bringing this
23 idea forward. The idea of trying to prioritize the priorities,
24 sort of categorize the priorities a little bit more clearly,
25 adding some nuance to sort of the list as it is, what are the

1 priorities that we in subcommittees think are the most
2 important, need the most attention. What is the signal we
3 could send to the community to say please -- please move
4 forward on these ones if nothing else gets done, move forward
5 on these priorities. And still maintain kind of a core list of
6 ongoing priorities that probably are part of that quest toward
7 more perfection, you know, that are never going to get done
8 necessarily, but could always use more insight.

9 So I want to thank everybody for being involved in
10 that in subcommittees, sort of in this latest discussion
11 document, trying to do some of that ranking, if you will, you
12 know, in our subcommittees by prior -- in our priorities by
13 subcommittees, so thanks for that.

14 The comments were fairly limited this time. I think
15 we only heard a handful of comments from the community and
16 specifically related to any of these. I mean, there was
17 generally strong support in those comments that we did hear. I
18 thought there were some interesting things to consider, two
19 comments in particular: one that suggested that we add some
20 dimension to kind of an ongoing piece of research around BPA,
21 really adding phthalates and plasticizers to that research
22 priority. I think that's an interesting one and consistent
23 with I think a lot of the things that we're trying to do from a
24 Board perspective. I'd love to hear any thoughts on that.

25 Another comment that was focused on the need to --

1 under -- elevating some of the priorities that are
2 socioeconomic in nature, just to reflect some of the issues
3 that I think, you know, are really important to this community
4 and exist in a broad perspective -- from a broad perspective.

5 You know, there's one that I -- it's funny that I
6 mentioned the DPA, phthalates and plasticizers one, because
7 there's another one that comes up a lot in various forums about
8 how we use the research priorities to talk about this ongoing
9 issue of plastics in organic or plastics in agriculture. I
10 don't see that personally as a research priority. I see that
11 as just an imperative that we're all working on.

12 I don't know what the research actually is on that.
13 The research is, let's find pathways out of this. And I, you
14 know, tell me that I'm wrong.

15 I'd love to hear others tell me that that's -- to me,
16 that's not what this list is intended to do. The list is
17 intended to sort of provide some granular ways to sort of dig
18 in on specific things that do need research. I'm not sure we,
19 correct me if I'm wrong, I don't think we need research on
20 whether, on how to get plastics out of our food system.

21 But anyway, I'll leave my comments at that. I --
22 again, thank you all for being involved in the process. And I
23 just want to see if there's any questions or comments on the
24 document and feedback that we've heard.

25 BOARD MEMBER QUARCOO: Mindee?

1 BOARD MEMBER JEFFERY: I just wanted to say thanks
2 for your work on this. When we first came on the Board and
3 Steve Ila was recruiting us all quickly into leadership
4 positions, he asked me about being the Materials chair. And I
5 said, no way, I can't do research priorities. Wood's going to
6 be great at that. And it's really played out. And I
7 appreciate your passion and the updates you've made. And thank
8 you so much for your focused work on this.

9 BOARD MEMBER POWELL-PALM: When I first got on the
10 Board, I could not understand what the point of research
11 priorities was. And I'm starting to get a little bit -- I'm
12 feeling okay for myself on that confusion because the through
13 line is not there yet. And I really appreciate hearing from
14 Mark Lipson saying, like, where is the research?

15 And I really appreciate you, Wood, for continuously
16 helping us ask that question. What does this mean? Why are we
17 doing this? What does it result in?

18 And so the prioritization, I think we allowed
19 ourselves to say there are certain things that we don't really
20 have questions on anymore, or they're so big that maybe they're
21 not really an ask to the research community. And I'm really
22 excited at the prospect of this becoming a much more useful
23 list, that we will actually see papers come out of this, see
24 research that means something come out of this.

25 And so I encourage all future Boards to take this

1 work very seriously and figure out how do we get more of a
2 dialogue with the research community so that we can be more
3 useful in our articulation of what we need.

4 CHAIR SMITH: Yeah, on a similar theme, I feel like
5 we're maybe starting to get some information back and more of
6 that would be really valuable. So we heard from Aaron
7 Sullivan, the public comment about the research being done on
8 alternatives to celery powder. Carolyn mentioned some stuff
9 coming around with the methionine.

10 And so I don't know how best to continue to ask for
11 that feedback loop, but I encourage -- I don't know, anybody to
12 just keep working on that.

13 And then I just wanted to highlight, and maybe this
14 is part of it, is that one of the comments noted that we
15 haven't had someone from NIFA come since 2022, and perhaps
16 having someone come back to speak to us at an upcoming Board
17 meeting would be useful.

18 BOARD MEMBER TURNER: Yeah, you stole my thunder on
19 my parting comments.

20 CHAIR SMITH: So sorry.

21 BOARD MEMBER TURNER: I was going to ask for a NIFA
22 presentation at the fall meeting, so I'm formally doing that
23 now. So thank you for bringing that up.

24 And thanks also for the loop back on celery powder
25 and methionine, because I do think there are applied examples

1 that we're hearing all the time from folks, and I forgot to
2 mention that, so thanks.

3 BOARD MEMBER QUARCOO: Yeah.

4 BOARD MEMBER DIMITRI: So I mean, I guess I'm
5 extremely fortunate because I was able to go to the OREI
6 project director's meeting last week and then come here, but,
7 you know, we're still talking about the role of the food techs,
8 but could that be one of their activities is they go to that
9 meeting, which is held every year, and then they give a report
10 back to the Board about the research that's ongoing?

11 BOARD MEMBER TURNER: I think it's a good suggestion,
12 and maybe for the time being it's a combination of both. Let's
13 get NIFA back out to talk to us in an open Board session, but
14 also maybe make that a priority, because I think it does need
15 -- I mean, I think we were in that uncomfortable period in 2022
16 where we said, to your point, Nate, what's going on? What's
17 happening here? Can we hear from the research community?

18 And, you know, all of a sudden it's two years later,
19 two-and-a-half years later, and we need to hear from them
20 again, but I think a more regular check-in would be really
21 helpful and would be meaningful to all of us, because it's hard
22 to track all this. It really is hard to keep track of all of
23 it.

24 And I know it finds its way into our work, I know it
25 finds its way into TRs, it finds its way into all kinds of

1 things, in so many ways, but it's hard sometimes to track it,
2 and so I like that suggestion.

3 BOARD MEMBER QUARCOO: Allison.

4 BOARD MEMBER JOHNSON: Thank you. I love the idea of
5 bringing someone from NIFA back. I wonder -- I want you to
6 hear them, but I wonder about next year, actually, as I
7 remember having them come as one of my early meetings, and it
8 was a nice way to kind of get introduced, so as we onboard new
9 members, it might be valuable to have them hear from NIFA early
10 on.

11 You can always come back. One thing that stood out
12 to me in public comments yesterday was equivalent seed
13 varieties in organic, and that Europe is getting ahead on this,
14 and I wonder if research on equivalents of organic and non-
15 organic seed varieties should be on the crops list, and this
16 might be another food tech assist job to start digging into the
17 details on Europe and give us more information to get into
18 that.

19 BOARD MEMBER NANDWANI: That's fine.

20 Carolyn has already mentioned, and I think Kyla also,
21 I see the value of updating these research priorities, really,
22 and it's a good idea to have Matt back or somebody from NIFA to
23 share them and see what other solutions they may have, but it's
24 a good idea to have Matt back to have a presentation in a
25 future meeting, so it's really valuable. Thank you.

1 BOARD MEMBER QUARCOO: Brian.

2 BOARD MEMBER CALDWELL: Yeah, thanks, Wood, for all
3 your great leadership on this. This is wonderful, and I
4 really, closing the loop, bringing the information back really
5 strikes a chord with me because I used to work for -- used to
6 be a cooperative extension educator, and that was supposed to
7 be part of our job. Now the extension system in our country
8 has really diminished over the last 20 years in terms of, I
9 don't know, the overall kind of grasp that it has on things.
10 And in my experience, I also don't see eOrganic or even ATRA as
11 prominent as they used to be, and those were vehicles to get
12 the information back to the farm community. So I see this as a
13 really important part of the whole thing.

14 It's, okay, we got -- we asked for the research.
15 Some of the research has been going on for a while. Some of
16 it's new. Some of it's happening. Let's collect that and get
17 that back to the farm community and just the very broader
18 organic community in our case, and it's a tough job, and I
19 really think that the work that Heather is -- we sort of had
20 done a little trial project, again, with the parasiticides on
21 this, and I'm really looking forward to getting that
22 information and then seeing if we can promulgate that
23 information to the extension, ATRA, eOrganic, to get that back
24 around to all the farmers.

25 So anyways, just wanted to throw that in there, and I

1 think it's -- I think this is a powerful tool, so I appreciate
2 it.

3 BOARD MEMBER QUARCOO: Up next is Nate, but I'll
4 quickly inject myself in there before that.

5 Yeah, and when that information gets to the farmer
6 and they have good results, we want that feedback as well,
7 because sometimes research is done in a research environment
8 and when it goes into an actual farm environment, it's not as
9 applicable, or it doesn't yield the results not in that kind of
10 environment, so when it goes into a natural farm and it works,
11 that feedback is also good, and it's still data being collected
12 on the outcome of that.

13 Nate Powell-Palm.

14 BOARD MEMBER POWELL-PALM: Thank you, Franklin.

15 Building on Brian, I think that the other casualty of
16 a diminished extension system is there's not good information
17 gathering as to what the problems are, and I think that's
18 something we've struggled with on this Board as well. I think
19 it extends everywhere.

20 I recently served as a grant reviewer, and in looking
21 at what researchers were proposing to fix for farmers, my job
22 was basically to say, is that a stupid idea? As a farmer, I'm
23 just like, nope, we don't need that. Zero funding. We don't
24 need that, we don't need that, and so how -- I would like to
25 task the community with really trying to survey farmers' hearts

1 and saying, what are your problems? How can we solve your
2 problems? Not what are our perception of your problems, but
3 what are you actually -- what will make you thrive?

4 And I think, you know, we're getting there, for sure.
5 I think that there's a lot more information to gather though.

6 In Montana, if we just gave \$100 million to solving
7 Canadian Thistle, how do we get rid of it? We would be endless
8 amounts more organic grain, and those sort of things that are
9 not sexy. They are boring, and they are needed, so just to
10 throw that in there.

11 BOARD MEMBER QUARCOO: Amy, thank you.

12 VICE CHAIR BRUCH: Yeah. Thank you, Wood, for
13 shepherding this work over the years. This is really
14 important. I look at everything on this list, and I'd love to
15 have answers and information to be circulated in the community,
16 so just kind of always elevating this list is half the battle.

17 I think we're making progress. I love these ideas
18 that folks are coming up with to try to cross things off the
19 list or at least circulate information. That's good.

20 One thing I wanted to highlight was a comment from
21 one of our webinar farmers that was very innovative. He's
22 actually in my area. He talked about some of the no-till type
23 farming that he's been doing with the roller crimper methods
24 and intercropping, et cetera. And we asked him how he received
25 his information, and he said Google through YouTube. YouTube

1 is how he was learning some of these techniques, and I wanted
2 to just thank Erin Silva in that process because she -- Kyla
3 mentioned her before on the celery powder, but she's been
4 really instrumental on communicating her research to farmers
5 via YouTube methods, and that is a popular way to exchange
6 information. So when we're looking at making this information
7 that we find through research priorities digestible, we need to
8 also leverage these new ways to reach folks, and one of them is
9 through YouTube and other methods, so that's been a pretty
10 powerful distribution of roller crimper information to farmers.

11 BOARD MEMBER TURNER: Franklin, I think you've missed
12 Carolyn. Carolyn had a question.

13 BOARD MEMBER QUARCOO: Okay, all right. But Jerry --
14 let's go to Jerry. I'll come up to --

15 BOARD MEMBER D'AMORE: Thank you.

16 What I have to say should have been said at the very
17 outset. We've sort of blown by where I really had an aha
18 moment, which was the idea of setting our priorities of our
19 priorities. And I've been around long enough to know that
20 we've been told by researchers that, hey, just tell me what you
21 want, and your priorities will be my priorities. Don't bother
22 to rank them.

23 I was there for that piece. So what I would like to
24 say is, attaboy, congratulations. We cannot abdicate setting
25 our priorities, one, two, three, four, setting and ranking

1 them. Thank you.

2 BOARD MEMBER QUARCOO: Carolyn.

3 BOARD MEMBER DIMITRI: Oh, great, thank you.

4 So this is kind of just a thought that I had
5 yesterday, and it came up again today, and maybe it's to put a
6 possibility in Jenny's ear.

7 So when people were talking about seeds and
8 cataloging seeds, organic availability by crop, that's not
9 really something that any researcher would do, but I think
10 there are nonprofit organizations that would do that really
11 well, especially if they had a cooperative agreement from the
12 Department of Agriculture to compile that information for them.

13 So that's just a plug, an idea, throwing it out
14 there, see where it goes.

15 DR. TUCKER: Okay. Are you talking specifically
16 about seed or research priorities?

17 BOARD MEMBER DIMITRI: Okay, I'm talking about seeds.
18 So in this conversation, someone started-- brought up seeds
19 again.

20 DR. TUCKER: Right. Yes. Okay. We actually did
21 that. Several years ago, we did fund -- we did a -- at the
22 time, I didn't know how to do cooperative agreements, so we
23 actually did it as a contract. They're much easier to do as a
24 cooperative agreement. We did fund OSA a small amount of money
25 to develop reports. We're not allowed to fund external

1 software development, but we can fund reports.

2 And from what I understood, that money actually was
3 helpful in OSA. I don't think a lot of people remember that we
4 even did that, but we did fund that. And our goal was to help
5 spark the process with the hope that then the private sector
6 would take it on.

7 So anytime we get a funding request, I think as has
8 been covered, our budget is now flat, right? And so that makes
9 trade-offs. We don't always talk about theory of constraints
10 here at Board meetings, but they are real.

11 And we have to have, think about trade-offs. And
12 when you choose to do this, you don't choose to do that, even
13 if you don't say it, right? And so we would need to --
14 cooperative agreements, if any, nonprofits have approached us
15 before with kind of proposals on what they would do, why they
16 would do it, what the deliverables would be. Anything a
17 cooperative agreement generates has to be for the public good
18 and in the public domain.

19 So certainly open to proposals on that, also
20 understanding the constraints of budgets.

21 BOARD MEMBER DIMITRI: Thank you. Excellent.

22 BOARD MEMBER QUARCOO: I want to make one last
23 comment and then we will have to move to the next. A number of
24 universities have a system where they have their faculty
25 members have research and extension appointments. And part of

1 that is to let them know, I mean, select relevant things for
2 their research. And then when they find stuff, they send it
3 back. So you are always in a situation where you appreciate
4 what is of utmost importance, research-wise, because you work
5 with the people who need it. So I think talking to a lot more
6 of these people who also help us to bridge that gap.

7 I would like to thank Wood for all the work on
8 research projects and his leadership on that. He's another
9 person I call at all times when I don't know what I'm doing.

10 SECRETARY LEWIS: You can do it next year.

11 BOARD MEMBER QUARCOO: Thank you. All right. We
12 will now move on to -- do we have to vote on? Okay.

13 We will now move on to inerts, and that will be led
14 by Nate.

15 SECRETARY LEWIS: All right. Update for the Board
16 and discussion on inert ingredients in organic pesticide
17 products.

18 Just a quick retelling of the most recent history
19 around this issue. Last spring, summer, the NOP directed the
20 Board to take up inerts and provide comments or recommendations
21 or opinions or some sort of recommendation by the end of 2024
22 in response to the comments the program had received in their
23 advanced notice of proposed rulemaking and PR around inert
24 ingredients.

25 We were able to include a few questions into the

1 docket for the fall meeting and receive responses. Those
2 informed the development of the discussion document that we
3 presented for this meeting we're in right now. And what we're
4 going to talk about today is a brief summary of the comments
5 received in the docket for today or for this meeting, some
6 ideas around subcommittee work in the near future, and what to
7 anticipate for the fall.

8 Before I jump into the specific comments, I do want
9 to sort of elevate that I did hear frustration from some folks
10 in the community around the pace at which we are deliberating
11 on this topic, and that really raised some hairs for me. I'm
12 very protective of my fellow Board members. We all come from
13 diverse backgrounds. Many people don't have exposure to
14 pesticides, let alone the inert ingredients. We don't know
15 which they are within those pesticides, let alone the arcane
16 and complicated regulatory system that goes into approving
17 those inert ingredients, let alone how we're going to proceed
18 on these various options. So I ask for patience.

19 We do have a deadline of this fall meeting, and I
20 want folks to respect the deliberative nature of the approach
21 we're taking to the work.

22 Okay. So we developed with the assistance of food
23 technologists, Heather and Isu, over the winter a spreadsheet
24 of inert ingredients. We referred to it as Appendix A, and we
25 asked for feedback on it. Some general themes of those

1 comments were that it was difficult to utilize the information,
2 there was desire for additional analysis on non-synthetics and
3 functional groups, there was a preference for the Board to use
4 commenters' own analyses, there was support for the approach to
5 have objective data for NOSB to analyze various options, and
6 comments were split on one of these issues that I'm
7 particularly interested in is whether we should evaluate
8 options based on the entirety of List 4, or only those inerts
9 reported to be currently in use by OMRI, WSDA, and PCO.

10 We asked about the guest speakers we are going to
11 invite to our upcoming subcommittee meetings. There were some
12 great suggestions around previous Board members who have worked
13 with inerts, toxicological experts, inert and pesticide
14 manufacturers and formulators, and representatives from EPA.

15 Questions around the accuracy of Appendix A,
16 particularly as it relates to inerts currently in use, that's a
17 difficult question to answer for even those folks who have that
18 privileged information. So I think we just need to acknowledge
19 that we are working with an opaque world of substances, and we
20 are going to try to shine the light into that dark closet as
21 much as we can.

22 Because of that, there's difficulty for stakeholders
23 to analyze the accuracy of the information. And again, do we
24 need to evaluate the entirety of List 4, or only those reported
25 to be currently in use? And then we did receive some valuable,

1 helpful, and helpful technical corrections from OMRI on
2 specific substances.

3 Board capacity and list management. Commenters that
4 were supportive of listing all inerts individually provided
5 ideas for increasing Board capacity or reducing Board demands
6 through support from NOP, and through the careful and
7 thoughtful grouping of substances. Supporters of the option to
8 rely on EPA inert approval with exceptions provided
9 descriptions of EPA current review processes and potential
10 exceptions that could be added to a listing.

11 And commenters generally did not appear to support
12 the endeavor to create another entity to hold and manage a list
13 of approved inert ingredients, aside from the EPA and/or the
14 national list.

15 And so before I jump into next steps, I wanted to
16 make sure there weren't any other public comments from the
17 Materials Subcommittee work group, which is myself, Brian,
18 Logan, and Franklin.

19 So before we jump into next steps, I would, if you
20 all have any additional specific comments you wanted to
21 highlight, and make some room for that right now. No? Okay.

22 So next steps for the subcommittee. For subcommittee
23 guests, this is on the very short term in the next few -- next
24 month or two, we have decided that we're going to invite
25 outside experts to provide information. So we are working to

1 identify and invite a toxicological expert, hopefully a
2 university researcher. We are in communication with EPA about
3 bringing an EPA staff member who's familiar with the current
4 way and policies and procedures that EPA uses to review and
5 approve inert ingredients in pesticide products. And we are
6 going to invite an inert manufacturer and a pesticide
7 formulator to answer questions. And we will be doing this in
8 the subcommittee setting. So all Board members are welcome to
9 attend such a meeting, but it will be in a subcommittee
10 setting.

11 And what to anticipate for fall 2024. The working
12 group's going to develop proposals for both options that
13 stakeholders mostly support, which is either to list all inerts
14 individually and the option to reference EPA lists with
15 exceptions. Subcommittee will consider and debate those two
16 options as they're developed and refined. And we may bring
17 forward both options at the fall meeting in a proposal for a
18 full Board vote.

19 I think that concludes my slides. And I'd be happy
20 to have the work group provide any more context or information
21 or open it up for discussion.

22 BOARD MEMBER QUARCOO: Mindee.

23 BOARD MEMBER JEFFERY: Can you externalize that from
24 a process perspective if we brought two forward? I haven't
25 seen that yet as a Board member, so.

1 SECRETARY LEWIS: It would be a novel approach.

2 BOARD MEMBER JEFFERY: I like it. I think it's
3 interesting and diplomatic. I was just curious. Roads
4 unknown?

5 SECRETARY LEWIS: I think to some degree, yes. I
6 think it would be deliberately approached so that both options,
7 which the program has indicated are valid options, receive
8 airtime. And in sort of straw polling of the Board, it does
9 not seem to be the case that we are arriving at a single
10 consensus position. And so to honor that, I think, giving both
11 options the fair shake is an appropriate way to proceed.

12 BOARD MEMBER JEFFERY: Is this where I get to wax
13 philosophical about how much I love this group and how we go
14 about doing this work?

15 BOARD MEMBER QUARCOO: I have a quick question. So
16 just so I understand the process, if we go that, in two
17 different directions, can the same Board member vote yes to
18 both options?

19 CHAIR SMITH: We don't know the mechanics yet, okay?
20 So we're going to be in communication with the program to make
21 sure that whatever path we do is functional for them in
22 rulemaking. And so we haven't had those conversations yet.

23 This is sort of at the proof of concept stage. And
24 so there will be more conversations. We don't want to, like,
25 trip over ourselves, but yeah, we'll figure it out.

1 SECRETARY LEWIS: Yeah, and rather than getting
2 distracted by a procedure, I think the takeaway is that we all
3 are committed to supporting each other in development of the
4 best possible proposal for each of those two valid options.
5 And how it is exactly we do the voting and the mechanics, I
6 think we'll figure that out.

7 BOARD MEMBER QUARCOO: Amy.

8 VICE CHAIR BRUCH: Okay. Yeah, oh, thanks, Franklin.
9 Oh, am I -- is it me?

10 BOARD MEMBER QUARCOO: Yes.

11 VICE CHAIR BRUCH: Something else, Nate. Okay.
12 Sorry, I'm trying to read the room here.

13 Anyway, thank you so much for the overview on where
14 things are at with the inerts. I know our timeline's really
15 accelerated here. Is there an opportunity to leverage the open
16 docket and get feedback from the community in advance of the
17 proposal -- the two proposals?

18 If we could air the two proposals on the open docket
19 first so we can see stakeholder feedback on that. So I'm just
20 trying to think of ways to execute this since our time is
21 short.

22 SECRETARY LEWIS: Yeah, it's a really good question.
23 I think that's a logistics -- it is a logistics challenge, and
24 I'll acknowledge it. I think I'm not particularly comfortable
25 with putting half-baked proposals on the open docket to be

1 sliced apart and put back together, and I'd rather develop full
2 ones that the subcommittee can consider and debate and vote on
3 within the subcommittee, which then would contribute to a
4 proposal for the fall.

5 But it's an interesting question around how to
6 leverage the open docket because of the accelerated timeline.
7 So let's do some good thinking on that.

8 BOARD MEMBER RUCH: Thanks.

9 DR. TUCKER: Okay, on the inerts topic, from a
10 program perspective, I want to actually repeat and reaffirm
11 what we said in the work agenda item on inerts. I know that
12 was a long time ago when we sent the work agenda item, but I
13 think it's worth just remembering that we have asked for as
14 many viable options as possible to feed into rulemaking, right?
15 We don't want just one -- we don't want to put -- I don't think
16 we want all our eggs in one basket on this.

17 We've got a whole rulemaking process we have to go to
18 after this, right? So we want as many options as the Board
19 considers viable to feed forward into rulemaking. Because if
20 we feed forward into rulemaking with lots of options, some of
21 the public is to weigh in, we do cost benefit analyses, we have
22 a lot of good trade-offs to deal with, right? Which is good,
23 we want multiple trade-offs.

24 If we only have one option, we go into rulemaking,
25 and for whatever reason, we can't get rulemaking through

1 because it's too expensive, it's whatever, then we're right
2 back where we started. And that's not where the community
3 needs us to be. So that's the program's input at the moment.

4 BOARD MEMBER QUARCOO: This is beautiful. This is
5 good. Allison.

6 BOARD MEMBER JOHNSON: Thank you. Thanks for all the
7 work that the working group, what's the right name? Yeah.
8 Working group has put into this. This is a really complicated
9 and important issue.

10 One, just reaction, Dr. Tucker, to what you just
11 said, and then one suggestion. I wonder, then, if we should
12 think about working in the negative, and actually vote on what
13 is not feasible. So then, we sort of take things off the table
14 and leave the rest on, could be another way to think about it.
15 And then, kind of along those lines, in the discussion
16 document, it says we could consider the individual ingredients
17 in groups, but ultimately, they would each need to be listed
18 individually.

19 We have a lot of groups of things that are already on
20 the list. So I'm wondering if you could say more about why
21 we're concluding that we need the individual listings, or
22 whether there might be some batches of very similar inerts that
23 could actually be listed as a category, without referencing
24 EPA's list.

25 SECRETARY LEWIS: Good questions, and ones that we'll

1 consider in the work group and get back to you on.

2 CHAIR SMITH: I mean, there's so many different ways
3 that groups are currently listed. And so, you have, like,
4 electrolytes, right? Then you also, that are just a group,
5 that don't have the, you know, little eye, whatever. And then
6 you have colors, which are grouped, and then individually
7 listed. So I think there's, like, all the ways. So we'll have
8 to think about the best way.

9 SECRETARY LEWIS: Yeah, and, sorry, I wasn't quick
10 enough on the draw there. But the way I had imagined the
11 individual listing working is that everything's listed
12 individually, but they're reviewed in groups. So the burden on
13 the Board is diminished significantly in the review process,
14 because all of the common functional groups are evaluated
15 together.

16 BOARD MEMBER JOHNSON: Do you mean on an ongoing,
17 like -- I picture headings with individual listings under them,
18 or something like that?

19 SECRETARY LEWIS: Perhaps, or, but I'm more thinking
20 about the sunset review process, that it wouldn't be, now let's
21 go to alkyl blah, blah, blah, blah, blah, and then we'll go to,
22 you know, so.

23 BOARD MEMBER QUARCOO: Wood?

24 BOARD MEMBER TURNER: I think we can leave it for
25 subcommittee work. I was just going to say, the grouping -- I

1 was persuaded by the group concept, too, or I was persuaded by
2 the group concept, but I also think one of the things we're
3 almost trying to remedy here is obsolete groupings of
4 materials.

5 So, anyway, it raises some questions, so I look
6 forward to the discussion as a committee.

7 BOARD MEMBER QUARCOO: Any other questions? No? All
8 right, thank you.

9 I'd like to thank the Materials Subcommittee for all
10 the work they've put into the various aspects of what you've
11 done, Nate, providing leadership on inerts, Wood, and Mindee,
12 and the entire group, and I'd like to thank you all. Thank
13 you.

14 CHAIR SMITH: Okay, before we move to the Policy
15 Development Subcommittee, in my humanness, in my first time
16 being the chair, I forgot to announce before we took the first
17 vote that the NOP did gather declarations from the Board, and
18 no Board members reported any conflicts of interest, so I just
19 wanted to state that for the record. Apologies for missing
20 that step.

21 And now I'm going to turn it over to Nate Lewis,
22 chair of the Policy Development Subcommittee.

23 Nate?

24 SECRETARY LEWIS: All right. Thanks, Kyla. Let's
25 see.

1 This is the first subcommittee that I have chaired,
2 and oftentimes the one with the driest material, so as an
3 effort to engage the audience, I've brought along a prop, which
4 is an organic cheese head labeled, I think, in compliance with
5 the new SOE requirements for bulk handling.

6 UNIDENTIFIED SPEAKER: Nate, you've got to look this
7 way. There you go.

8 SECRETARY LEWIS: And with that, we'll kick it off.
9 So the topics on this update are upcoming semester work plan,
10 future subcommittee topics, and then we'll go into the details
11 of the policy and procedures manual, which is before the Board
12 as a proposal.

13 Current and future subcommittee work. The PDS is
14 working on developing processes for food technologists' work
15 planning. So we are blessed to have the support of food
16 technologists' staff roles from the program, and we are looking
17 for ways to ensure their work planning is efficient and
18 supportive. So we're soliciting specific needs for specific
19 work agenda items from Board members. We're identifying
20 bottlenecks in areas where Board capacity can be supported,
21 like, for example, sunset reviews, identifying ongoing research
22 needs for the Board to fill in when specific requests are
23 minimal, and ensuring that work plans for food technologists
24 are full but not overwhelming.

25 The PDS is also engaging with the Office of the

1 Secretary and the Equity Commission to better understand how
2 the Equity Commission recommendations that were finalized a
3 couple months ago will be implemented agency-wide, and to
4 identify and embrace how the Board can lead, by example, for
5 other Federal Advisory Committee Act boards at the agency.

6 We have some granular work as well around refreshing,
7 doing a refresh on the member guide. This is an internal
8 facing document that helps Board members onboard and understand
9 processes so that they can succeed during their service. And
10 we're going to engage with the program on the sharing of
11 responsibilities for onboarding new members.

12 Just as a reminder, we are anticipating five new
13 Board members in 2025, and five more Board members in 2026. So
14 we will have 10 new Board members in the span of two years, and
15 some real effort and focus on the onboarding process is
16 something we're taking very seriously.

17 Now I'm going to turn it over to Amy to tee up the
18 updates to the Policy and Procedures Manual as her role as vice
19 chair.

20 VICE CHAIR BRUCH: Okay, Nate, thank you.

21 The Policy and Procedures Manual, the PPM, provides
22 procedures for the functioning of the NOSB and is designed to
23 assist the NOSB in its responsibilities. One of the
24 accountabilities, as Nate mentioned, the vice chair is to help
25 maintain the PPM and ensure its accuracy, and we tackled this

1 this past semester within the PDS subcommittee. The last
2 update to the PPM was conducted on April of 2022.

3 So moving on to the next slide, just to kind of
4 quantify the work that was done, most of the updates were non-
5 substantive in nature. Essentially, we worked on updating some
6 clerical avenues and technical edits for clarity. Also,
7 updates were made to better describe current policy and
8 procedures, and also more clarification on the roles and
9 responsibilities of individuals.

10 And with that, I'm going to pass it over to Nate now.
11 He's going to dive into a few more of the substantive comments
12 for more thorough Board review, and then touch on public
13 comments. This definitely was a collaborative effort amongst
14 the subcommittee, and I'm happy to make the updates here. So
15 go ahead, Nate.

16 SECRETARY LEWIS: So I'll just be highlighting a few
17 of the more substantive change. I'm not going to go through
18 every changed comma and addition of an S or deletion of a sub
19 or something like that. So I'll be focusing mostly on the
20 substantive changes.

21 This first one is about clarifying the roles of the
22 administrative team, and it sort of codifies the role that the
23 admin team has on working with the program to onboard new
24 members and provide outgoing Board members with the opportunity
25 to share experiences and feedback. So we certainly want to

1 make sure new Board members are given the tools they need to
2 succeed, and that outgoing Board members have an opportunity
3 for feedback. This just codifies the role the admin team has
4 in facilitating those two important responsibilities.

5 This update is reflective of the agency's
6 interpretation of the Federal Advisory Committee Act, and that
7 the resource conservation role, in which I sit, I'm one of
8 three, are special government employees. So this is some
9 language that acknowledges that we are SGEs, but that we are
10 all peers. And so this is a little bit more clarification
11 under that.

12 In the vein of clarifying duties and roles, we added
13 a responsibility to subcommittee chairs' duties to ensure
14 minority opinions are given opportunity to be represented in
15 meetings and in discussion documents and proposals. Conducting
16 business, we updated the sort of reasons for not attending a
17 meeting in person. There was actually a lot of discussion
18 about how to ensure full participation of the Board.

19 We are operating with a member absent, and that is
20 challenging. We are fairly limited in our ability to force
21 someone to participate. And we also all live through a Zoom
22 reality through pandemic and have become more comfortable with
23 virtual appearances and want to support that.

24 So rather than it only being a medical situation that
25 might allow a virtual presence, we wanted it to be more

1 inclusive around understanding that there are many extenuating
2 circumstances which can prevent travel. And while that's
3 preferred to be here in person, we want full participation in
4 the Board.

5 And then as a grammar nut myself, I love these types
6 of changes. We changed the word impugn to malign to more
7 accurately reflect the meanings of these words. And I will,
8 when I go into the specific, I think this next slide will sort
9 of dive into that grammar lesson for the day.

10 In public comments, we didn't receive too much
11 feedback. Not surprising as these are not earth shattering or
12 a huge course correction, but rather more smaller updates.
13 There was general support for the changes, and there was some
14 continued interest in requiring minority positions to be
15 presented.

16 In terms of malign and impugn, I think Beyond
17 Pesticides put it the best, which was that impugn means to
18 assail by words or arguments, oppose or attack as false or
19 lacking integrity. Malign means to utter injuriously
20 misleading or false reports about. So we want folks to be hard
21 on the issue, not on the person. And we use this word malign
22 to better describe what it is we're trying to avoid in public
23 comments.

24 And I think with that, we'll go to questions and
25 discussion. I'm chair, so I will also run the queue.

1 Nate?

2 BOARD MEMBER POWELL-PALM: Thank you, Chair. Could
3 we jump back to that last slide? In thinking about how to
4 facilitate the most collaborative space in public comments, do
5 we feel like there's a better word than individuals to
6 represent private entities as well? Or organizations,
7 nonprofits?

8 SECRETARY LEWIS: I certainly am not going to speak
9 for the collective we, but I think that's a good thing to note.

10 Allison.

11 BOARD MEMBER JOHNSON: Thanks. I just wanted to
12 speak to the SGE change specifically. We chose the wording
13 there carefully to indicate that USDA changed their
14 longstanding interpretation of the Board members classification
15 as representatives. So it's a recognition of the reality that
16 we're operating under, but not necessarily an endorsement of
17 that change in interpretation. But it does reflect the status
18 that is now present.

19 SECRETARY LEWIS: Any other comments? Amy, go ahead.

20 VICE CHAIR BRUCH: I was just going to make one
21 comment about some of the public comments we received. And one
22 of the groups mentioned, hey, the next time the PPM's updated,
23 let's consider these additional things. And that was kind of
24 the methodology that PDS used.

25 We had a running punch list over the last few years

1 as a starting spot to make these changes. And that's what I
2 recommend. The next time this is officially evaluated, we just
3 leverage that punch list from information from the community
4 that we collect and ourselves to then implement for the next
5 time this is reviewed.

6 But this is constantly reviewed, but not necessarily
7 officially updated as frequently. As we noted, the last time
8 it was updated was a couple years ago. So public comments that
9 were mentioned to us, we will evaluate those for kind of the
10 next round of official updates. So thank you.

11 SECRETARY LEWIS: Appreciate that addition and
12 commitment to keeping the PPM up-to-date and incorporating
13 continual feedback.

14 BOARD MEMBER JEFFERY: Thank you, Michelle. She
15 often keeps those suggestions in a list for us. Thank you.

16 VICE CHAIR BRUCH: Yeah, thanks, Mindee. Appreciate
17 that and thank you, Michelle.

18 SECRETARY LEWIS: We were going to vote on this. So
19 I'm not sure if we still -- maybe we'll go all the way back to
20 the beginning to get to our motion slide.

21 BOARD MEMBER HUSEMAN: I have a question.

22 SECRETARY LEWIS: Go ahead, Kim.

23 BOARD MEMBER HUSEMAN: Is the suggestion on
24 individual and adding the word company substantive enough that
25 it would -- can we amend that part before we vote?

1 SECRETARY LEWIS: Let's discuss that and bring it
2 back up in other business on Wednesday for -- let's defer the
3 vote to Wednesday so we can discuss that and make -- I'd rather
4 not make it on the fly if we can.

5 Mindee, do you have a follow-up on that -- does that
6 work for folks? Okay. I think that's a valuable comment and
7 let's just make use of that time that we have set aside.

8 Okay, I guess with that, I will turn it back over to
9 Kyla.

10 CHAIR SMITH: Great, that means we're early for
11 lunch, y'all. So good job. And I didn't say it but I do love
12 the prop. It certainly made this presentation more enjoyable
13 for me anyway.

14 Okay, so we are coming back at 1:30. When we come
15 back, we are going to hear from the compost panel and then we
16 will have a break and then we will go into the work of the
17 crops subcommittee agenda. And so have a great lunch and we'll
18 see you back here at 1:30.

19 (Recessed at 11:52 a.m.; to reconvene at 1:30 p.m.)

20 CHAIR SMITH: Okay, everybody, we are going to get
21 started. And welcome back from lunch. It's beautiful out
22 there today, huh? Hopefully you guys got some sunshine,
23 outdoor access.

24 I don't think I need, yeah. Okay, so we are going to
25 start our afternoon hearing from an expert panel on the topic

1 of compost. I'm going to hand it over to Nate Lewis and Mindee
2 Jeffery, both on the crops subcommittee to introduce the
3 panelists and facilitate the discussion.

4 SECRETARY LEWIS: All right, thanks, folks. I will
5 introduce each panelist in due time. I wanted to sort of tee
6 up the panel with a short conversation about why now?

7 Why are we talking about compost now? First and
8 foremost, it's always a good time to talk about compost.
9 There's a saying that compost by itself won't save the world
10 but you can't save the world without compost. And it's a
11 foundational material in organic production and something that
12 we always want to stay on the cutting edge of. We also have a
13 unique Board composition right now.

14 So Mindee and I are both certified compost facility
15 operators. I received my certification in 2004 and have been
16 composting on-farm animal processing waste, manure and bedding
17 and crop waste for close to 20 years. Mindee also is a
18 certified compost facility operator and manages a compost
19 facility in Northern California.

20 Climate change and waste reduction goals are top of
21 mind for everyone. Compost plays a critical role in those
22 conversations. It's important we do a timely revisiting of
23 standards to ensure they are current and relevant. Our
24 standards are based off of the EPA's 503 rule which was
25 developed in the '80s, I believe, for management of biosolids,

1 '70s.

2 So in some ways it provided a good path for some
3 reliable metrics but it is time for a relook at that and a
4 refresh.

5 We also have a new law in California linking
6 compostable packaging requirements with the federal organic
7 regulations. And so that sort of is a catalyst for asking
8 these questions.

9 And we have an ongoing obligation to ensure that
10 organic farmers have access to compost that meets their quality
11 goals. So we want to be thinking about new and novel ways to
12 prevent and mitigate the presence of compost contaminants.

13 So I'm going to pivot back a little bit and follow in
14 the footsteps of one of my mentors, Miles McEvoy, who always
15 talks about birds in all of his presentations. And if I can
16 get this to work. We'll, no -- sorry, we're having a little,
17 there we go.

18 So I want to talk a little bit, very briefly, about
19 the Australian brush turkey, *Alectura lathami*. This is a
20 wonderful creature, partly because of its beauty and stature
21 but also because the males of this species actually create
22 aerobic and active compost piles to incubate the eggs of the
23 females in the flock. And these piles can get really, really
24 big.

25 And a suitable male is, or a male that's successful

1 in his breeding endeavors is one who can manage his compost
2 pile at the proper temperatures to keep those incubating eggs
3 on the right track.

4 So it's really an interesting and relevant
5 discussion. And I also want to point out that even they
6 struggle with plastic in their compost piles.

7 So, just wanted to sort of add some levity to the
8 conversation and introduce everyone to the Australian brush
9 turkey before we dive in.

10 So today we have, for our -- I thought these -- I
11 added some affiliations here and I apologize for the version
12 challenges we're seeing.

13 But we have our compost panelists, Doug Currier, Dr.
14 Pat Millner, Matt Cotton, and Tim Dewey-Mattia.

15 Doug is with OMRI and I'll read his introduction.
16 Doug joined OMRI in 2011 and spent the first seven years
17 working to support brand name product review.

18 Since 2018, Doug has led policy and standards
19 development activities for OMRI, educational outreach and
20 certifier support. He also oversees other projects, including
21 the creation of technical reports for the National Organic
22 Program.

23 Next we have Dr. Pat Millner. Dr. Pat Millner is a
24 researcher at USDA ARS Beltsville. She is a research
25 microbiologist in an environmental and food safety laboratory

1 and does work in sustainable agricultural systems laboratory.
2 She has her Ph.D. in marine estuarine and environmental
3 sciences and microbiology from the University of Maryland and
4 has served as an expert consultant for a whole host of
5 government entities, including the U.S. Congress.

6 Matt Cotton has over 30 years in the organics
7 recycling industry. He works with public and private composters
8 on a daily basis to meet the challenges of large scale
9 composting. He's worked on statewide policy legislation and
10 regulation related to composting in California. Lead
11 instructor for U.S. Composting Council's Compost Operator
12 Training Program. Co-authored chapters in the composting
13 handbook. Among other things, has almost two decades on the
14 Board of Directors of the U.S. Composting Council, including
15 three terms as president.

16 And then last, and certainly not least, we have Tim
17 Dewey-Mattia, who is the recycling and public education manager
18 for Napa Recycling and Waste Services. Napa Recycling is the
19 local franchise hauler in Napa, California as well as the
20 operator of Napa's Recycling and Composting Facility and the
21 Northern Recycling Compost Facility in Yolo County, California.
22 Tim got his start in zero waste over 25 years ago first with
23 the Middlebury College Recycling Program and then for several
24 non-profit recycling organizations in San Francisco. He's been
25 at Napa Recycling for 18 years and works on all aspects of

1 program development, implementation, compliance, and outreach.

2 So with that, I think we'll -- oh yeah, I was going
3 to just give folks the agenda for today is you are in the
4 introduction now, then we'll have panelist presentations, 10 to
5 15 minutes a piece, and then we'll have a Board conversation,
6 Q&A and discussion with the Board members concluding at 3:30.

7 So with that, I will turn it over to Doug and give
8 you the thing.

9 MR. CURRIER: All right, hi everyone. I am Doug
10 Currier from OMRI and want to say thank you to Nate and Mindee
11 for the invitation, to Michelle for all the support, getting
12 this set up. I'm having a ton of fun getting to be up here on
13 this panel. We're going to break it down and talk compost.

14 Let's go see if this works. Yeah, so OMRI's mission
15 is to support the growth and trust of the global organic
16 community through expert, independent, and transparent
17 verification of input materials and through education and
18 technical assistance. So what I'm going to try to do here is
19 sort of set the stage for compost review and how we do it now,
20 and then kind of set the stage for the rest of the panel to
21 talk more about the ins and outs of compost.

22 So farmers, producers, we have a variety of different
23 stakeholders, and I just added a few here just to sort of
24 orient everybody.

25 So to me, 205, 203 is really the heart and soul of

1 compost standards because it has many different practices that
2 are required in organic production. I've added those here, and
3 it ranges from the addition of animal and plant materials, crop
4 rotation, good tillage, cover crops, all that good stuff.

5 There's also this contamination element, which we'll
6 definitely talk about more, and the management practice
7 standards have to prevent contamination of crops, soil, and
8 water. And so we cite this part of the standard quite a bit
9 whenever we're looking at inputs, and that includes compost.
10 There's also this must not use any fertilizer or composted
11 plant material that contains a synthetic substance not included
12 on the national list.

13 And so I just wanted to add this here as we start
14 talking about compost, because to me, this is a really
15 fundamental part of the organic standard. Oh, hang on, who's
16 that? Oliver? So I was told that Oliver might show up as we
17 start talking about compost and manure, and so sure enough,
18 there Oliver is.

19 Thank you, Bill Wolfe, for the permission to include
20 Oliver here.

21 So 205.203(c) is all about manure and compost. So we
22 have the raw manure standard here, and there's that days to
23 harvest or pre-harvest interval, whenever we're talking about
24 manure. And of course, composting manure is a way to mitigate
25 the risks involved with raw manure application, but raw manure

1 application is part of the standard, and there's that pre-
2 harvest interval.

3 203(c)(2), talking about compost, there are different
4 rules. And that is in NOP guidance at 5021. So yes, there are
5 compost standards at 203(c)(2). The NOP guidance goes further
6 and talks about other methods that are not included in the
7 standard, but are based in the standard.

8 So these are just a few examples of methods that we
9 see regularly whenever we're reviewing compost. So we have in-
10 vessel. We've got static aerated piles. There's windrow
11 methods. You'll see a theme here of time and temperature as an
12 important part of the methods that are used to make compost,
13 and we are, through our reviews, getting turning logs,
14 temperature logs, things like that that are demonstrating that
15 compost is being made and meeting a standard. Then we have
16 203(c)(3), which is uncomposted plants.

17 So I wanted to -- terminology is really important.
18 So I want to make sure we're all thinking about terminology in
19 the same way. So feedstocks is a term that you will need to
20 get familiar with. So that's the incoming materials that are
21 then composted. So these can range in their makeup, manure,
22 leaves, food waste. These are just a few examples of incoming
23 feedstocks that are then put through the composting methods
24 that we were just talking about.

25 This is all leading up to the actual method of

1 composting. So once these feedstocks are received, they're
2 going through that compost method. We'll hear more from actual
3 composters here later. But the finished compost is also
4 scrutinized. And it's scrutinized by looking at heavy metal,
5 arsenic, cadmium, lead here under the USDA standard. I can
6 talk about the Canada standard later if we want to go there.
7 Pathogens, fecal coliforms, and salmonella. And looking at
8 presence of contamination too.

9 We very much have a reactive system, I think, where
10 we're sort of responding to contamination. But there are ways
11 that we work with composters to ensure that they have a
12 contamination prevention plan so that we don't have to react to
13 contaminated compost through a complaint.

14 So, yeah, I added this slide in just to show how many
15 compost and compost-related product manufacturers that we work
16 with. It makes up a good part of our brand names product list.
17 And, you know, compost has been there from the beginning. And,
18 but we -- the compost, other than those sorts of -- the content
19 there after the number, that's our generic materials list
20 category. So, you know, you can see 183 of these products are
21 in our compost other category.

22 We also have this compost windrow category, which is
23 there to, you know, show that compost is meeting exactly what's
24 in the federal standard. Compost other is very much what's in
25 the guidance. So that 5021 guidance.

1 Compost tea, compost inoculants, you know, other, you
2 know, compost-related -- we've got a variety of different
3 products that are on our list and categorized.

4 Okay, so contamination. We have visible contaminants
5 and then invisible contaminants. So the visible contaminants
6 include plastic trash, glass, you know, things that, you know,
7 you don't want to see in a compost.

8 Invisible contaminants, so there's that fecal
9 coliform bacterium there. And that -- and then also there's
10 that chemical compound, which is paraquat.

11 So there are a number of known persistent herbicides
12 that, you know, you are not going to be able to see unless it's
13 actually showing up in plant growth. Damage, I guess, you
14 know, through starts -- vegetable starts are the big ones that
15 I've seen, or we've seen over the years. So just making a sort
16 of a distinction between visible and invisible.

17 I would -- you know, we can talk more about, but I
18 put contamination in quotes because that's a term that is
19 subject to interpretation to some degree, I would say. But,
20 you know, these are, you know, examples of what I think we
21 would all consider contamination.

22 So sorry if this is hard to see, but I wanted to just
23 note that we have a complaint process. And this is getting
24 back to that sort of reactive system that we kind of have right
25 now. But this is a fake letter. So don't worry, I'm not, you

1 know, outing anyone here.

2 But that is not a fake photograph. So that's taken
3 from a complaint that we've received over the years.

4 So I just want to note that there's requirements
5 that, you know, we have to have for what we consider a formal
6 complaint. And so just noting kind of what those are, and this
7 is all in our policy manual. So I guess I'm putting that in
8 here just to acknowledge that we take this seriously and we
9 have a way to respond to complaints whenever they come in.

10 I'm going to wrap up here and hopefully I
11 accomplished sort of setting the stage for this.

12 But I wanted to end by noting we've got a pretty
13 robust web search now on our website and we have a lot about
14 compost. And so just an example of going to our website, you
15 can filter and look for content related to compost.

16 Okay. That's my contact details. And with that,
17 I'll pass it to Dr. Millner.

18 DR. MILLNER: Good afternoon, and thank you to the
19 committee for inviting me to share with you the information
20 about composting. I'm going to focus on compost process, some
21 differences in maybe definitions and terminologies that have
22 been used over the years, and then move directly into the
23 microbiology and those kinds of standards that motivated the
24 development of a number of different process standard and
25 testing requirements for compost.

1 Okay, so this is a very basic sort of diagram of the
2 composting process, what it involves, how it's happening.
3 You're putting in materials, as were described, compiling them,
4 different configurations for different types, as we heard, and
5 materials coming out, so the finished product. And what do we
6 want? We want compost that is beneficially useful in
7 agricultural endeavors, and there are a lot of different types
8 of agricultural endeavors.

9 So, what's common about this? We call it a
10 thermophilic composting process. Why? Because there's
11 biological activity that's decomposing and stabilizing if the
12 process is being used correctly, organic matter that is exposed
13 to thermophilic temperatures, and that means at least 55 degree
14 centigrade conditions, that are a product of biologically
15 generated heat. Microbes decomposing the organic matter that
16 is heaped up in various configurations, depending on the
17 system, yielding a stabilized product that can meet pathogen
18 content, plant growth standards for beneficial uses.

19 So the compost product that's generated, it should be
20 an organic soil conditioner, as we all want. It should be
21 stabilized to a humus-like process, so, and processed so that
22 it can inactivate zoonotic, and what I mean by zoonotic
23 pathogens are those which can attack people and animals, as
24 well as plant pathogens, and also any errant weed seeds that
25 might have gotten into that product as a part of the input.

1 It should avoid attraction of insects and vectors at
2 the end of the process. So that goes to odors and volatiles.
3 It should enhance and maintain soil health and support crop
4 growth.

5 So if we want all those things to come out, we have
6 to have some measures, and a variety of different measurements
7 along the way through the process, and at the final product,
8 have been developed. These process and product quality
9 standards have been developed over a period of time with the
10 help of EPA activity-supported research, which has led to two
11 different ratings, one is a process to produce compost, and the
12 other -- to basic compost requirements, and one to accomplish a
13 further composting process.

14 Now, the Leafy Green Marketing Agreement in
15 California, and the U.S. Composting Council, through its STAY
16 program, as well as OMRI, have developed a variety of different
17 methods to evaluate the quality of the final products. So
18 these are just kind of breaking it down as to what happens in
19 these stages of composting.

20 One of the questions that came up when I was
21 introduced to talk to you all about this process, was that, are
22 there some standards for home composting? I am not aware of
23 any standards in the United States for home composting, as in
24 your backyard. That's a local issue. If somebody knows of
25 some that have been promulgated, I'd be interested in knowing

1 what those are about.

2 But for the larger industrial type of composting,
3 these are the steps that are easily discernible as individual
4 steps in the process.

5 So the material comes in, it goes through a
6 thermophilic process, goes through a curing stage where it's
7 matured and stabilized, then it may be dried or otherwise
8 screened to improve the physical quality of it, and then,
9 however it's going to be marketed and distributed.

10 Go back. So there are different standards, whether
11 it's the leafy green marketing agreement, which is specifically
12 for California and other leafy green growers, like lettuce and
13 herbs and that sort of thing. Some of these standards that
14 they have developed also apply to commodity, more attention is
15 being paid to commodities which have since received attention
16 because of foodborne illness outbreaks, such as cantaloupes, a
17 difficult product because of its netted surface.

18 There are other standards which are, like the FDA has
19 the FSMA standards now for food safety, specifically. So each
20 one of these areas, including the tomato gaps, all of these
21 have their own individual requirements that have to be met.
22 Some of them overlap, but you need to pay attention to those
23 depending on what jurisdiction you're operating in and what
24 kind of material you're handling, what crop you're growing.

25 I'm just putting all these things out here for your

1 reference and to kind of bring all of this together because
2 there are so many different types of rules and quality features
3 that have been developed by these different agencies.

4 So how did we get to the particular time and
5 temperatures requirements that we have? This was based on a
6 variety of research and some of which continues to go on as we
7 find that there are newer strains of organisms or
8 microorganisms that people are paying more and more attention
9 to in different kinds of production systems.

10 So back in the '80s, we had a lot of support from the
11 Environmental Protection Agency with regard to the development
12 of their rules about composting of sewage sludge. And those
13 have continued to be examined and reexamined over the years.
14 Just presenting here for your -- not that you're going to
15 remember all these little details here, but just so you'll have
16 this information to take under consideration.

17 There are a variety of different methods that people
18 used to determine when and how much temperature and how long
19 those compost piles need to be able to reach a certain
20 temperature in order to ensure that the pathogens of concern
21 are destroyed. So there are a number of different methods. I
22 just put this out here so that you can see and you can refer to
23 those different methods.

24 Well, how do we go about doing this? I mean, you've
25 got tons of material in some industrial-size operation piles.

1 We've also used these, other than thermocouples being placed
2 into the piles at various places or other types of temperature-
3 measuring devices, we've also used this kind of infrared
4 technology, where you point and shoot and determine. So as the
5 piles are opened up or cross-sections are made, you can get
6 kind of a profile of what the different temperatures are and
7 the effects of certain environmental conditions, whether it's
8 been rainy, whether it's been dry, what side of the pile has
9 received a lot of illumination from the sunlight and how that
10 helps to warm things up.

11 So with all of that background, I'm going to switch
12 now into an area that I was asked to talk about, which is
13 things that haven't been so compostable and are now under
14 review, which are the sticky labels that you see on the fruits
15 that you buy, the handheld sort of avocados and oranges and so
16 on. They have a little label on it and that label has a lot of
17 meaning. There's a background on all of that.

18 We now have a consideration of how to make those
19 labels compostable. So the big picture of this is that
20 agricultural exports go all over the world. There's a lot of
21 money spent on moving products around. There have been -- the
22 European Union has recently looked into how to improve the
23 compostability of these kinds of labels.

24 So they are using these labels for a very useful
25 purpose. The EU had considered whether they could be made into

1 something that would be home compostable. And this is why I
2 mentioned earlier that we don't have a standard for home
3 compostable in the terms that we have for the industrial type.

4 So I'm not sure that that's really going to be
5 something that we'll see in the near future approached here in
6 the United States, but it is something in the larger context to
7 consider.

8 There's a need for compostable labels for these
9 products because when they do go, lots of fruit and vegetable
10 material gets into a commercial composter, there are going to
11 be a number of these labels, and we'd like to see that they get
12 composted.

13 The issue is about the construction of the materials
14 that are going into these labels. So why are we using these
15 labels? This gives you some kind of background on why do we
16 use them. It helps to identify a whole lot of features about
17 where these products are going to, whether they're organic,
18 which is a really important feature of the label, and whether
19 they are certified in a number of different ways. So it can
20 also help with tracing if there's a need for a trace back for a
21 foodborne illness outbreak. So they're very useful sort of
22 tracking devices in a way.

23 So, in general, we're looking at where in the
24 composition of these labels can we actually make some
25 modifications to help move them more toward a compostable end.

1 And there are some problem issues with the adhesives in
2 particular, but also with some of the actual components in the
3 label.

4 So a unit out in our USDA Agricultural Research
5 Facility in California, it's a bioproducts research unit. Dr.
6 McManus has provided us with these slides on a research that
7 he's been doing over the past few years, looking at how to
8 overcome some of the challenges of developing a water-based
9 material coating system.

10 And there's some particular challenges with this.
11 One is the coating. One is the de-wetting of that, when you're
12 actually putting on the adhesive material. And the other was a
13 couple of other additional stages and the actual laminating of
14 the sticker so that it will stick to the fruit for the useful
15 life of that product.

16 So, the product -- the progress to date has involved
17 testing over 300 different formulations and processing
18 combinations to select which ones of the adhesives will
19 actually do the job that they're aiming to do, to make sure
20 that they'll stick for as long as their useful life is needed.

21 And some of the critical application problems are
22 with some novel kind of components that have had to be
23 developed. And those have been tested in a sort of pseudo-
24 industrial process. They do look like they can degrade, but
25 there's further work that needs to be done on that. So, that's

1 a work in progress, basically.

2 This is a pilot scale, just an assembly to show you
3 what it somewhat looks like in this process. If you have any
4 questions about that, I encourage you to contact Dr. McManus.
5 This is his contact information. And now I'm going to
6 transition into the next thing, which is, what are the
7 perspectives from the International Fresh Produce Association?
8 Dr. Max Teplitski has provided this.

9 In the Washington state, they had a number of
10 different industry groups communicating that, to the lawmakers,
11 that there were no viable alternatives to these stickers. But
12 Canada is also very interested in this, PLU stickers. And what
13 Dr. Teplitski has communicated, has said that there's a real
14 strong interest and a need for these compostable stickers. And
15 the stickers are an alternative to packaging for other
16 commodities that can be sold in an unpackaged way.

17 So the PLU stickers will allow the organic community,
18 in general, to reinvest into organic production and development
19 for new types of varieties of products. So the next generation
20 of these stickers is envisioned to carry a typical kind of QR
21 code, not just those barcodes that we're used to, to allow
22 packing for more information.

23 So, these PLUS versions are designed to ultimately
24 allow for traceability, trace back of where they were produced,
25 what do we know about the carbon footprint about those. And

1 another aspect will be, Dr. Teplitski told me that he had a lot
2 of information that he posted about these PLU stickers on his
3 LinkedIn website. So -- and he has some extensive information
4 that could be useful to people who are particularly interested
5 in this topic.

6 This topic came up for a vote last week. And the
7 final version was accepted by the EU Parliament. They did have
8 a provision in there for home compostability, which is why I
9 mentioned that in the beginning. We're not sure how that's
10 going to fare out. May ultimately have to be modified. It's
11 going to be up to some individual countries in the EU to
12 determine where they want to land on things about the standards
13 for these PLU stickers.

14 So this is a work in progress, and it's something
15 that is -- it will be occurring. It's just a matter of time
16 until the physicality of the production of these compostable
17 stickers occurs, and the research developments are progressive
18 enough to meet that demand.

19 The legislation to go with it will depend on a number
20 of things within the EU countries, and how that impacts the
21 rest of the world in terms of competition, possibly, for
22 importation and movement of commodities across borders.

23 So I think that pretty much concludes what I have.
24 Okay. This is not mine, actually.

25 Thank you very much.

1 If you have any questions, I will be around for most
2 of the day tomorrow, and I'd be glad to talk with anybody about
3 any aspects that are of interest about composting.

4 MR. COTTON: I'll say thanks, Pat, if Nate's not
5 going to. I'm happy to. Awesome, as always.

6 Always a thrill to be on the dais with Pat Millner.
7 She might just be a super talented microbiologist to you, but
8 for us, she is the go-to person on pathogens, so always a
9 pleasure. And can't thank you enough for having me here.

10 Not my first time testifying in front of the NOSB.
11 It's been a while, but always impressed. I got to listen to
12 most of Tuesday's comments, and just reinforced my respect for
13 you guys and the work that you guys do.

14 This is really hard, mind-boggling, granular work,
15 and you guys face it with aplomb and talent and research and
16 just a positive attitude, and it's inspiring, and I'm really
17 happy to be able to be a small part of that today, and I
18 appreciate the invite.

19 I'm going to switch gears really fast, and that's not
20 going to work. This will probably help. I could just do this
21 to myself, but am I doing it this way, or am I doing it? Now
22 it doesn't want to work.

23 Cool. We'll get this done eventually. So these are
24 just really quickly, this is my version of some comments that
25 have already been given by the U.S. Composting Council, the

1 CRAF, Ron Alexander, I generally agree with those.

2 We could harmonize the compost definition with
3 AAPFCO. Starting C:N ratio, yes, it's an important BMP, but
4 it's very rarely measured, and really not -- it's important to
5 composting, rarely measured, it's probably a lot to do with old
6 soil conservation data, trying to minimize volatilization of
7 nitrogen from composting. It's a thing, but having a number
8 there isn't terribly helpful.

9 PFRP, as Pat mentioned, pathogen reduction,
10 incredibly important criteria. I think it's working fine. I
11 don't think we need to go beyond that. The market can always
12 go beyond it.

13 It would be great to explicitly allow the commonly
14 used Kraft leaf collection bags, which are, do have writing on
15 them, so technically you could call them synthetic, but they're
16 incredibly common, especially here in the Midwest, way you
17 collect bags. And so we went to -- I went to my very first --
18 I used to hand stencil those back in 1986, my very first
19 composting operation, because we did not want to collect leaves
20 in plastic bags, so that's an improvement.

21 Don't think we need to look at additional
22 contaminants at this time without doing a lot more science and
23 research, but again, those comments have been discussed by
24 others.

25 Wanted to bring this up, this is pretty old data,

1 this is from 2016, back when NOP 5016 was being looked at, and
2 I was on the U.S. Composting Council Board, and I'm not now,
3 and just to be clear, these comments are mine, don't represent
4 anybody else, but at the time we surveyed composters, and I
5 guess I'd bring this up because the ability to sell compost
6 into organic is very important to composters. It's a very
7 important market, particularly in California, but across the
8 country.

9 Back in 2016, we surveyed a lot of large composters,
10 about 70 percent said they sold compost approved for use in
11 organic. It doesn't mean they sold to organic, but they sold
12 compost that was approved for use in organic. More than a
13 million tons at that time, it's probably more now, and you
14 know, only less than half of that went to certified organic
15 farms. Again, this is probably different, we haven't really
16 done a study, but it is being approved for organic, be
17 allowable in organic, is an important and premature quality
18 assurance step that many people really like and value. So
19 that's why we think this is important.

20 Nope. Anybody? Anybody?

21 We got two for one. So Nate wanted me to talk about
22 composting. Oh this will be fun. A lot of yard trimmings, a
23 lot of food scraps, a lot of manure composted, we have probably
24 5,000 permitted composting sites in the U.S. There may be an
25 additional 5,000, we don't tend to count ag composting site.

1 Maybe 200 accept food, which is a weak surrogate for
2 compostable acceptance. Excellent timing.

3 Oh, okay, what do you think? Look at that. So I
4 just said there's about 5,000-ish composting sites, the best
5 number we have, but there's less than 200 that take food and
6 less than that take compostable plastics, the real reason we're
7 here.

8 Just for reference, there's about 15,000 Starbucks.
9 Okay. You want to see that again? That was a good map. You
10 can look by state. Yeah, well there's -- this is the number of
11 composters that take food. And so by extension, potentially
12 compostable plastics. It's not one-to-one, it's a bad
13 surrogate, but not very many is my point. 15,000 Starbucks.

14 Turns out Starbucks isn't the only one who wants to
15 take the compostable plastics to compost. Just one generator.
16 There's 4,000 Walmarts. Walmart started selling compostable
17 plastics. There's, I don't know, 400,000 grocery stores.
18 There's a lot of generators, not so many composting facilities
19 is my point.

20 Where am I? Really? Why does this hate me? All
21 right.

22 So I'm going to switch to California. That's where I
23 do most of my work. We, and again, this is incredibly
24 important to our composters. We still landfill about 40
25 million tons. About 23 million tons of that is organic, not

1 all of its food. But all of that is dwarfed by manure, even
2 just from dairy, and we grow about 50 percent of all the U.S.
3 fruit and veg. And we do -- work I did in 2019, we do about
4 five or six million tons, again, of the permitted facilities,
5 not all the facilities, because we don't tend to count on farm.
6 We don't tend to count large ag folks if you're doing dairy.
7 Composters are different animals.

8 In California, about 65 percent goes to agriculture.
9 That is not like other states, but the vast majority of our
10 compost, this is from 2019, pre-pandemic, I would guess this
11 number's actually greater now than it was. I don't know how
12 many tons exactly goes to organic, but it's a significant
13 portion. And again, more goes through the process to become
14 allowable for organic, one, because in California we have CDFA
15 and we have Dr. Lee with us somewhere here from CDFA. You have
16 to be -- if you're going to make a claim that something is
17 suitable for certified organic, you have to register, get a
18 CDFA license, and register a product for CDFA. So it's not an
19 option in California. If you're going to sell organic, you
20 have to go through CDFA. And you're probably also going to do
21 OMRI.

22 So this is just a cool graphic I stole from a
23 magazine in LA. City of LA and there are 400,000 residents now
24 have access to green waste and food waste collection. I kind
25 of like what this graphic was saying, but that is the largest

1 curbside collection program of organics in the country. And at
2 the moment, they don't take bags. They don't take compostable
3 bags. They all get pulled out and landfilled.

4 So it's early days for Southern California. We've
5 been doing it in Northern California for quite a while, but
6 here's the hard part. And let me apologize in advance. I
7 speak really quickly. I will try to speak slowly. I will try
8 to describe three very robust and granular bills in a
9 relatively short amount of time.

10 But we've got three giant bills, very ambitious,
11 aspirational bills in California. SB 1383 was actually written in
12 2016 under Jerry Brown, but it's essentially food scraps
13 collection for everyone, everywhere, all the time. So we're
14 seeking a 75 percent organic waste recovery rate by 2025. So
15 super ambitious. We already probably collect more food waste
16 than any other state.

17 On top of that, we lay our SB 1201. And I get this
18 is an alphabet and numeric soup, and I don't expect -- there
19 won't be a test afterwards, but trying to explain how these
20 interact. SB 1201, among other things, defines compostability
21 specifically for compostable packaging by building on existing
22 standards, including allowance by NOP.

23 And then SB 54 is really trying to get at single-use
24 packaging and reducing everything packaging and plastic food
25 service ware sold in the state to be reusable, recyclable, or

1 compostable. That's a big lift. That's a huge thing, and
2 we'll probably be doing that for some time, but we're going
3 ahead as if it were easy.

4 So I'm going to go through these pretty quickly.
5 It's okay. It's what we do in California. Look, we had a 25
6 percent goal. We didn't meet it, so we went to 50 percent. We
7 didn't meet that, so now we're at 75 percent. Pretty soon,
8 we're going to be at 125 percent. Those are going to be
9 awesome. We have aspirational goals. We take climate change
10 seriously. We want to do better, but I guess I'm recognizing
11 that that's challenging.

12 SB 54, again, really looking at single-use packaging,
13 trying to get everything reusable, recyclable, or compostable.
14 You could do an hour on that, and you wouldn't cover all of it.
15 They just started meeting. There's an advisory Board. There's
16 a producer responsibility organization. It's a lot, and it's
17 going to -- if implemented as written, it's going to be a
18 dramatic change in how plastic packaging and food service wares
19 is sold and managed in the state. We'll see how that goes.

20 1201, which is really where we come in on this space,
21 defines compostability as having to meet ASTM standards free of
22 fluorine compounds, distinguishable from non-compostable
23 products, designed to be associated with recovery of desirable
24 organic waste, i.e. food waste. We don't want compostable cell
25 phone covers or sneakers. Everybody see the Puma compostable

1 sneaker that came out? Yeah, not a great idea. But
2 fundamentally accepted for use by organic in January 2026.

3 I want to take for a minute and just understand that,
4 again, I said we have 200. We have about 35 facilities in the
5 state that handle mixed materials, so ostensibly food waste and
6 potentially compostable plastics of the 250 or so that we have.

7 So if you guys do nothing, what I'm really here to
8 say is NOP should do what's right for NOP. Don't worry that
9 California has these ambitions. We'll be fine. There will be
10 plenty of compost for organic if all this goes away. We're not
11 trying to drive the bus. We're just -- what 1201 is
12 recognizing is that organic ag and the imprimatur that gains is
13 an important market for compost in California.

14 So you guys can do absolutely nothing and it'll be
15 absolutely fine, but we'll be talking about this for some time,
16 I'm sure.

17 Just for some context on compostable plastics, really
18 small part of the global plastics world. Roughly 400 million
19 tons or less than 1 percent of that, and yet we spend an awful
20 lot of time about it. It's super granular. There's different
21 formulations. Some of those are from corn or starch or other
22 fine materials. Some actually contain petroleum products,
23 which is confusing, and we have a thing called the plant
24 bottle, which is neither.

25 So there's a lot of, you can imagine the consumers

1 totally get this. Everyone knows exactly how to participate.
2 It's super clear. No confusion whatsoever. I noticed a bunch
3 of compostable stuff around the hotel. Starbucks has BPI
4 certified compostable straws, some eco products. There's like
5 four different -- Mindee's drinking out of one right now.

6 How many facilities are there in Milwaukee to take
7 those? Kind of zero. Maybe Compost Crusader will take some of
8 that sometimes, but pretty much there's no infrastructure for
9 it, and that's pretty much the case in many places around the
10 country, which is a challenge.

11 A lot of lookalikes. This one I liked. This came up
12 on LinkedIn the other day. Anyone want to guess which one's
13 compostable? This was from a composter who was actually a big
14 fan of compostable plastics, but it's frustrating because the
15 manufacturers are trying to make replacements, and so they want
16 to make them look alike. This is not a new idea. We've been
17 wrestling with this same idea since at least the late '90s, and
18 it has not really changed, but you cannot expect the average
19 consumer to look at those cups and make a distinction and put
20 that in the right bin, even if you have the right bin, which
21 most of you don't.

22 This is some data from some very pro-compostable
23 people that, I'm going to get the name wrong, but this is some
24 study done. In fact, Tim's was one of these sites. This is
25 nine facilities that accept food waste and compostable

1 packaging. This is the game of how you look at this stuff, but
2 I don't like this study. I don't think it's particularly good
3 or robust or scientific, but this is their data that
4 compostable packaging made up 22 percent by volume of this mix.

5 If you add all the other contaminants with that, if
6 you consider that a contaminant, that's more than all the food
7 waste together. So this collection system, whatever we're
8 doing, isn't working very well. And this has led many
9 composters to install something like this.

10 This is a brand of de-packager. There's many brands
11 of de-packagers now. In fact, there are more entrants into
12 this market because manufacturers are realizing that composters
13 want these because when they see the sea of plastic that comes
14 along, all the food-adjacent plastic that comes along, they're
15 looking to this.

16 And this -- no one -- that machine installed like
17 that costs you almost a million dollars. Nobody's buying this
18 for compostable plastics. They're buying this to get out all
19 the other stuff because, and I'll beat up my countrymen for a
20 minute, Americans don't want to sort or we can't figure out how
21 to sort correctly. We cannot put the right stuff in the right
22 bin, at least yet.

23 Unfortunately, when you use a piece of equipment like
24 this, it's very agnostic. It's based on texture and material
25 density and a lot of the food gets wasted. You can see it does

1 pull out a lot of the bags, the picture in the middle, but you
2 end up with not more food waste, but actually less food waste.
3 But composters don't have the time, the inclination, the
4 budget, the resources to hand-sort this stuff as much as they -
5 - some of them do. Tim does a combination.

6 They have one of these and they have hand-sorters as
7 well and it's a lot. It's a lot to ask a manufacturing system
8 that's taking a waste product and trying to add value so that
9 it's worthy to be put on an organic farm or on any farm for
10 that matter.

11 So here we are. Very aspirational collection of food
12 scraps. Really wanted to dramatically reduce single-use
13 plastics. We had another part of 1201 required CalRecycle, our
14 state waste agency, to see if you could bifurcate the
15 collection of organics, which, don't worry about that. It's
16 impossible. It didn't make sense. Bad idea.

17 But the state surveyed the 35 composters that take
18 mixed materials, got 24 responses, so 70 percent response rate,
19 and none of the surveyed facilities accepted compostable
20 plastics for processing into compost, which means they either
21 sorted them out one way or another, either before the
22 composting, during the composting, or after the composting.
23 They're just not -- actually most of it means they're sorting
24 them out they don't want them, or they're sorting them out
25 ahead of time.

1 And in addition to that, we've got to -- compostables
2 need to be an acceptable feedstock under the NOP, which is
3 where the VPI petition comes into, which is this bit of text.
4 You shall not offer to sell -- sell or offer to sell a product
5 in the state that's labeled as compostable or home compostable,
6 whatever that means. I'm not saying either, FYI. If it does a
7 number of things, including, as you said at lunch, on or after
8 January 26th, it's an allowable agricultural input under the
9 NOP.

10 So that's why we're here. That's why the petition's
11 here. That's the question we're asking, and I hope you're not
12 completely lost in the numbers. That's all I've got. I'm
13 happy to pass it off to Tim.

14 MR. DEWEY-MATTIA: Well, I'll just start off and say,
15 kind of echo everybody else, thanks so much for having us here
16 to talk about compost. I mean, you have a lot of things, and
17 look at the agenda, a lot of things on your plate. Compost is
18 big for us, but obviously it's just one portion of what you're
19 doing.

20 But this is significant, and we appreciate the
21 attention on it. We're a hauler and a recycler and a
22 composter, and we operate in regional facilities in Northern
23 California, and so kind of a lot of what I'll end up talking
24 about when this pops up here is kind of working off of what
25 Matt was just talking about. But I actually was thinking

1 about, there's a lot that we're doing, and compostable
2 plastics, I started, I remember 20, 25 -- 20, 25 years ago,
3 these were already existing.

4 They've actually been around for a while, and we were
5 dealing with them at special events in San Francisco. And my
6 whole thing was like, there's a lot of confusion and discussion
7 that goes on around this, and this is actually a really
8 important part of the process right now, that we're coming to
9 some type of decision, whatever it is, that will kind of
10 provide us as haulers, recyclers, composters, guidance on
11 really how to run our collection and processing programs in
12 California. So we appreciate it.

13 BOARD MEMBER JEFFERY: Tim, would you mind making the
14 distinction as you're referencing organic wastes in your
15 slides, there's a distinction between --

16 MR. DEWEY-MATTIA: Very good point, right? Like big
17 O, little O. It's interesting. So we use the term organics,
18 carbon-based materials that we can compost. Obviously, you use
19 the term organic, and a lot of the consumers kind of recognize
20 it on the food end of things, not as a waste processing.

21 And actually, a lot of our collection programs
22 specifically, we don't try to use that term organics to talk
23 about food scrap, yard trimmings, and soil, paper,
24 compostables, and try to come up with other terms because the
25 kind of technical term is organics as in organic waste. And so

1 that's a good point to bring up is that we often are talking
2 about organics in a kind of waste -- for carbon-based products
3 that are being discarded and then made into new things, one of
4 which is compost.

5 I can kind of give a little bit, my slides said these
6 things, but I can talk about them too.

7 So we operate publicly owned, privately operated
8 facilities. We're private operator of, and we're a hauler and
9 a recycler and a composter. And a lot of folks have seen the
10 close the loop, right? The kind of all the consumer, the
11 collection company, the recycle composter, and it goes all back
12 around to the producer. And so we're actually dealing with a
13 lot of -- three of those portions of it. So we see it on all
14 -- we see it not just on the composting end, but, and I'll flip
15 to the slide now, which is here. Perfect.

16 Great. So we're doing -- we're kind of doing several
17 steps of the process and it gives us a chance to really see how
18 all these products, including compostables kind of act. And
19 also looking at the -- we're not a landfill owner and operator.
20 So we're really trying to work with our communities.

21 We work in Napa, but also in a lot of regional
22 communities in the Bay Area and Central Valley, Sacramento
23 area. I'm trying to obviously hit all these mandates that we
24 have from the state and bring in more material to our
25 facilities to make quality end products, some of which are, you

1 know, cardboard and glass and paper recyclables, but also
2 obviously compost and compost that we can list for use in
3 organic ag.

4 We talked about CDFA and OMRI and we have products
5 listed for both at both of our facilities. We've put in huge
6 amount of upgrades at both our two facilities, millions of
7 dollars in both the recycling and composting end to try to deal
8 with the complicated mix of materials. And then obviously we
9 do a lot of work on the educational end with our customers
10 because that is super key here.

11 Our Napa facility, small 22 acres. We're fortunate.
12 We're in a really great location with really expensive land, 22
13 acres. So it's shoehorned in right on, kind of obviously in
14 wine country and right along San Francisco Bay. Composting
15 takes up part of that and you see that in this slide. And then
16 we have a single stream recycling where we park our trucks.

17 This is a lot of things happening at one site. We've
18 been able to fit in a covered area and static pile system on a
19 two and a half acre parcel to be able to compost food scraps
20 and other materials. And then our Yolo County facilities are
21 near Davis and Sacramento.

22 We operated a windrow facility in the region for
23 several decades previously and just opened this new facility at
24 the Yolo County Landfill. So public/private partnership.

25 2022, it's 180,000 tons per year. We filled that up

1 immediately and we're expanding now another 100,000-plus tons
2 per year. Shows you the demand in California for composting
3 facilities that will take a wide range of yard trimmings and
4 food scrap material from communities that need to hit these
5 target mandates that the state has put out there. And also we
6 have markets for that compost that we can produce.

7 This is our collection program in Napa. Actually, we
8 heard about SB 1383 so I won't talk too much about it.

9 This is actually -- part of that bill is to
10 universalize collection in California between different
11 communities so you don't have different color containers,
12 different collection programs everywhere, which is a common
13 problem not just in California obviously but around the
14 country. So the color schemes are being kind of universalized
15 to green, blue, and black or gray, and then the material
16 streams will be kind of become universal because of the SB 54
17 law. That's kind of the goal of it in kind of the coming
18 years, that packaging law that Matt was mentioning. So it all
19 kind of comes together.

20 We're trying to work, figure out what goes where. I
21 mean, and having that be something that all of our customers
22 know what to do with. It's the biggest -- we talk about all
23 this investment. I'll show you, I'm processing it, but really
24 the key is on the consumer and really before that, the
25 producer, the big thing. So that then the consumer can put it

1 in one of the three containers.

2 Obviously for organics, food scraps, yard trimmings,
3 that organics, we accept all materials. We do accept the
4 paperware which it's interesting for this discussion we're
5 having about the guidelines. I think we do need more guidance
6 on paper as well, not just compostable plastics as Matt pointed
7 out, but whether or not it's the collection bags but also
8 unlined materials like pizza boxes and food takeout ware. Like
9 kind of where's the guidance on what is acceptable and what
10 isn't. I think it could be useful to have that be figured out
11 a little bit more.

12 We talked about feedstocks a couple of times. This
13 is our feedstocks. I tried to kind of have various different
14 images. It's fairly typical. I mean, we have great pumice
15 because of winery operations in our Napa site. So that's a big
16 portion. But otherwise, a lot of California composting even
17 with co-collected material, where we put the food scraps in
18 with the yard trimmings, it's still -- we just have a lot of
19 green waste, yard trimmings. And we have year round
20 collection, right? Because in the winter, a lot of stuff
21 actually grows.

22 We've seen an increase in the amount of yard
23 trimmings and green waste that we've been collecting because of
24 dealing with fires in the last decade. There's just a lot more
25 brush clearing. So some folks look at the 80 percent yard

1 trimmings, only 10 percent food scraps. We actually have way
2 more food scraps in our mix, but we've also seen a huge
3 increase in the amount of just total inbound tons with yard
4 trimmings. So it's been interesting to see.

5 Residentially, you'll see that bottom image. And I
6 put the arrows to try to differentiate between a compostable
7 liner bag and a conventional plastic one. It's still mostly
8 yard trimmings.

9 But the food scraps are mandated. They're also an
10 important part of our process. And then for commercial loads,
11 like on that bottom slide where you see our de-packager down
12 there, you see in the back, you see a lot of green bags, right?

13 We accept certified compostable bags, even though a
14 lot of them are required to be removed. We put stuff through
15 that de-packager.

16 And then you see some packaged food. So straight
17 from an industrial food provider where there is a lot of
18 material going to landfill that just never even made it to the
19 stores. And that's now required to be diverted. And so we end
20 up having to put in investments for de-packaging. We got a
21 grant from the State of California to put in a de-packager.
22 And most of what we put through the de-packager is packaged
23 food. You lose about 20 to 30 percent of the food scraps when
24 you run it through there, but it removes the packaging and gets
25 the rest to composting.

1 A little bit about kind of the process for composting
2 in our two sites, same system. It's a covered aerated static
3 pile, right? So it's static, it doesn't move. Versus the old
4 windrow where we just would turn them with loaders. And then
5 there's blowers. You can see the blowers that blow through
6 from underneath that concrete pad.

7 The company that designs these systems, ECS out of
8 Washington State, there's several other ones that do it too.
9 And this is really becoming the type of composting that is
10 required by air districts if you're going to want to compost
11 food scraps and other materials and kind of deal with all the
12 pathogen reduction and also deal with any kind of air VOCs and
13 try to reduce those.

14 We run through actually five different points in our
15 process for removing contamination. The biggest contaminant is
16 conventional plastic, the plastic bags and other plastic. Just
17 like in a recycling stream, by the way, where it's also the
18 biggest contaminant. So I think you'll always hear -- you'll
19 hear this come up that plastic is a problem and we're trying to
20 deal with it in several different ways.

21 We have a de-packager. We have hand sorting on a
22 conveyor belt, not unlike a recycling sorting facility where we
23 have people do it. I know you could potentially use robots to
24 do that too in the future. And then we are doing screening at
25 several points in the process to try to vacuum out the light

1 stuff, which is the plastic film from the heavier stuff and try
2 to reprocess our overs. I have a stat at the bottom. 97
3 percent of what we screen are compost overs.

4 So, right, we screen three-eighths of an inch.
5 Anything smaller falls through the screen so we get compost
6 that we can sell. The stuff that's bigger, we can't reprocess
7 it because it has too much plastic in it, but it's still mostly
8 not plastic. And so we end up having to send a lot of the
9 wood, wooden bones and other stuff that didn't break down to a
10 small enough size off to a landfill as landfill cover.

11 So I think part of the thing -- I mean, we would like
12 to be able to accept certified compostables for certain usages
13 to try to reduce that number in our overs so we can reprocess
14 that fraction and make compost out of it again. I mean, that's
15 a big thing. We send a lot of organic material to the landfill
16 that we would love to put back into the soil.

17 So this is our end market slide. We have -- it's
18 interesting, you know, in Matt's slide, like 67, 70 percent
19 goes to ag. In our Central Valley, in our Yolo County site,
20 it's almost all of it. And a lot of it goes to nut tree
21 orchards is the biggest market.

22 Napa, Bay Area, North Bay Area, it's a lot more
23 mixed. Probably less than 50 percent goes to ag while the rest
24 goes to landscaping, home garden use, soil yards, re-blenders,
25 re-baggers. It's a very diverse market.

1 We sell, right, OMRI CDFA listed compost and people
2 look for that logo, I think even if they're not an organic
3 farm, pretty clearly, whether they're home gardeners or whether
4 they're just looking for that kind of seal to show that it's
5 kind of been vetted and they feel comfortable about it.

6 But also recognizing we sell \$14 a cubic yard. We're
7 a big bulk producer. There's other types of material --
8 there's other types of compost in the region that are higher
9 end. And I think those are out there. We're doing municipal
10 material, making one type of compost. There's other ones. And
11 it's -- I think the market can handle it for more compost and
12 we're trying to be able to kind of add that back into the soil
13 as we try to reduce greenhouse gas emissions and keep our soils
14 as healthy as possible.

15 There's a lot of words on here, and I would love to
16 get to discussion because I think hopefully you have questions
17 for us. A lot of these are the same types of things you hear,
18 kind of what Matt was talking about. We are trying to get --
19 hit these mandates, make more compost, divert food scraps from
20 the landfill to reduce methane emissions, right? That's a huge
21 goal here.

22 Trying to also kind of make the rules and make
23 everything make more sense for consumers and put the plastics
24 and the packaging folks in charge of trying to figure out what
25 to do with their problem materials, right? These are all the

1 things that we're trying to deal with while we provide a
2 service, basically a utility service to our community.

3 A lot going on. We've put a lot of investment into
4 the education and the programs and the facility. We're ahead
5 of the game, although a lot of communities are doing this as
6 well. We have some challenges, and I think the things to
7 remember with this is we're trying to divert more food scraps
8 and have less single-use plastic. And I think we still have
9 some ways to go to get people at home and at work and at school
10 to put food scraps into that green bin that we provide. And
11 this is kind of been our challenge.

12 And then we also obviously have an issue with too
13 much plastic. So how do we get there?

14 I'm touching kind of, there's a lot of discussion
15 there just on this compostable plastics and the compostable
16 products. This is just our take, my take on this one. This --
17 there's a lot of nuance, a lot of discussion. I think they
18 offer us the potential to get more food scraps and have less
19 overall conventional plastic if they are properly labeled.

20 There's a lot of big ifs, but this is true. If
21 they're properly labeled, if they're used for specific usages,
22 talk about fruit stickers. We think liner bags is very useful.
23 You can talk then maybe about certain types of food service
24 where not to replace single-use plastic. We do not want that.
25 I don't think anyone wants that.

1 But to get there obviously for us and it would have
2 to change in the rules. Otherwise, we'll have to kind of look
3 at what to do going forward in California and as a composting
4 site and as a service provider on what are the alternatives to
5 trying to collect using the compostable bags and what kind of
6 businesses and our other customers on the end can use it for
7 food service ware, hopefully reusable, but if not, what's the
8 alternative if it needs to be recycled or compostable and you
9 can't be labeled as compostable anymore in California.

10 So that's kind of like, there's a lot. I think
11 that's sort of what I had to say about it. But hopefully we
12 can talk more and you have some questions for all of us. So I
13 believe that is the end of my talk and all four of our talks.

14 So thanks again.

15 SECRETARY LEWIS: Let's all give our panelists a
16 round of applause for their contributions.

17 Those were really compelling presentations and I
18 think we asked the right people to show up today to shed light
19 on some of the thornier knots we're trying to untangle here as
20 part of this work agenda item. So I want to turn it over to my
21 fellow Board members to tap the resource that we've assembled
22 and have them answer the questions that you may have and
23 hopefully it spurs a conversation that brings us to the
24 conclusion of our allotted time.

25 Just as a time check, we have 50 minutes to have

1 questions answered. And so I think with that, I'll just open
2 it up and I'll be happy to start a running queue, for anyone
3 who may want to go first.

4 Okay, Brian, go ahead.

5 BOARD MEMBER CALDWELL: Yeah, question for Matt
6 Cotton.

7 And that is, a lot of this went by me, I'm afraid it
8 was pretty quick, but you had a slide that showed, I believe it
9 was sort of a comparison between the amount of dairy manure and
10 the amount of maybe food waste. I sort of missed it. So could
11 you just kind of either go back to the slide or just talk that
12 through?

13 MR. COTTON: Thank you for the question, Brian. I
14 believe that number I got from this interweb thing and I
15 believe it's 350 million tons of manure.

16 California's a huge dairy state. I know we're in
17 Wisconsin, that's probably heretical to say in Wisconsin as the
18 premier dairy state, but we also have a lot of cows, a lot of
19 dairy in California. So yeah, our amount of dairy dwarfs the
20 amount of -- there's obviously a lot more cows than people.
21 That's just fundamentally the issue, so --

22 BOARD MEMBER CALDWELL: Well, yeah, I don't think
23 there's more cows than people in California. That would be 40
24 million cows, but maybe there is.

25 MR. COTTON: There are a lot of cows.

1 BOARD MEMBER CALDWELL: That's a lot of milk. But so
2 what was -- I really don't remember, the key thing in my mind
3 is, so what was the comparison between that 350 million tons
4 and then what was the other category and then how much was it?

5 MR. COTTON: So we generate about 40 million tons of
6 garbage every year and about 350 million tons of dairy manure.
7 So the food waste is about five or six million tons and out of
8 -- the numbers, they don't add up. So these are all different
9 sources, different ideas, but the point is we have a lot of
10 different organic waste.

11 We compost a fair amount of that manure, we just
12 don't track it very well. So that's certainly a source for
13 people. People use a lot of manure. They use it directly.
14 They compost it, and I say compost it because I teach
15 composting classes and they don't always follow it the way we'd
16 like them to do it, but they do dry it and heat treat it to
17 some extent. So we have a lot of -- California's a very big
18 state. We have a lot of different organic materials to
19 compost. I'm not I'm sure I'm answering your question, but --

20 BOARD MEMBER CALDWELL: No, you are, and that's kind
21 of what I was -- what I'm trying to get out of my own mind is
22 just, so of the waste, the kind of usable waste stream that
23 we're dealing with, what are the proportions? And I can see
24 that apparently the dairy manure is huge, and are we kind of
25 like wrestling the whole system in order to just deal with that

1 2 percent of the waste stream? Yeah. And then even a smaller
2 percentage of that is this compostable issue.

3 MR. COTTON: Let me commit to getting, now you're
4 making me question the number. I apologize, I threw this
5 together pretty quickly. I'm going to go back and verify that
6 number, exactly how many cows we have and how much manure they
7 generate, versus the municipal stuff we have really good
8 numbers on, and I will get back to you on that.

9 It's an enormous state. We've got enormous, you
10 know, the world's largest agricultural production in the world.
11 So we use a lot of different organic products at a lot of
12 different times on different crops. We're trying really hard.
13 We've banned -- you're going to laugh out loud again. I
14 respect that, I would have done it myself. We're going to ban
15 open burning in the Central Valley again for the second time
16 because we still burn a lot of stuff, and we're trying to
17 incentivize growers, almond growers and grape growers to not
18 burn that stuff. The biggest thing we burn in the Central
19 Valley is grapes, partially because of the way we trellis them,
20 partially for lots of different reasons, but we still burn an
21 awful lot of grape waste. There's a tremendous amount of
22 organics that can be managed differently, but we have a vast
23 supply of organic materials.

24 We have a vast organic or agricultural production.
25 We use -- really, a very good researcher at UC Davis, Michelle

1 J. Russell, once at a workshop, referred to composting as
2 fairly niche in California agriculture, and I got really mad
3 when she said that, and I started thinking about it. I'm like,
4 yeah, she's really right. And Brendan Harrison, who's a
5 doctoral candidate now at Berkeley, was at UC Merced and did a
6 study, looking at the 1383, the big food waste diversion law,
7 and found, in looking at cities and doing this cool
8 mathematical map of cities and farmland, that it would take
9 about 14 years for us to exhaust. If we took -- if we
10 ambitiously went after all the organics in the state in 1383,
11 we wouldn't exhaust all the ag land for 14 years.

12 So we have far more farmland than we have compost.
13 In fact, we're likely, we have, and Tim didn't talk about it
14 too much, and in my other life, we talked a lot about, we have
15 a lot of incentive programs for people to use compost. We have
16 a healthy soils program, we've got a procurement program, we're
17 putting compost down for carbon sequestration.

18 We probably won't have enough compost, and we need to
19 do more. So lots of compost, I guess, is my message. Again, I
20 still don't feel like I've answered your question accurately.
21 I apologize.

22 MR. DEWEY-MATTIA: I was going to add on those
23 numbers, we manage -- the dairy manure is managed in sort of a
24 separate system than how we manage municipal solid waste, which
25 is the yard trimmings, the food scraps, right?

1 And so when we're talking about -- when we do a
2 study, we have good numbers from CalRecycle, the state agency,
3 on what's in the discard stream, and it's 50 percent organic
4 waste, and it's 35 percent food scraps, right? That's not
5 including all that dairy manure.

6 So I think when we look at -- we could divert all
7 that organic waste that we see through our municipal systems,
8 plus stop burning in the Central Valley and composting instead
9 and make way more compost, but there's still ways to use all
10 that compost so we don't have to worry about saturating the
11 market with compost.

12 MR. COTTON: If I could, to the ratio question, I
13 think the reason California passed 1383 and the reason Jerry
14 Brown signed it, the reason we're doing it is because food
15 waste in the landfill degrades anaerobically, it creates
16 methane, much more powerful than CO2 and is a global warming
17 gas. That's why we're focusing on that more than on the manure
18 per se. Manure's already been digested once, so that's where
19 that driver really comes from, is for the climate change.

20 BOARD MEMBER JEFFERY: Brian, the slides are going to
21 be in our fall.

22 SECRETARY LEWIS: Go ahead, Allison.

23 BOARD MEMBER JOHNSON: Thank you so much, Mindee and
24 Nate, for putting this panel together and for all of you and
25 your presentations. This is an overwhelming amount of

1 information, but it's extremely helpful.

2 I have so many questions, but I'm going to start with
3 two lines of questions. The first is building on the point you
4 made. So, is the availability of organic compliant compost in
5 California a factor that's limiting growth of organic? Do we
6 have enough organic compliant compost to serve pretty dramatic
7 increase in organic acreage over time?

8 MR. COTTON: That is an awesome question. I don't
9 know the answer to that. I doubt it. I don't believe that
10 would be a limiting factor.

11 BOARD MEMBER JOHNSON: Okay. Thank you.

12 MR. COTTON: We have a lot of compost. I think I
13 said that earlier to Brian. We have a lot of compost. And no,
14 I don't -- I think we're about 6 percent organic in California,
15 something like that. So, no, I don't believe that's going to
16 be a limiting factor. Access to compost. I mean, if there's a
17 limitation, it's that compost is heavy and it's hard to move
18 and it's a massive state. And we don't always have farms right
19 by feedstocks right by markets. So that, it's more of a --
20 it's a Yelp problem, not a supply problem.

21 BOARD MEMBER JOHNSON: Okay, super helpful. Thank
22 you.

23 And then, Tim, I heard you say that you're pulling
24 all the cups that look like this out right now because they're
25 not allowed and you have your organic compliant verifications

1 in place. My understanding is that a lot of composting
2 facilities pull out anything that looks like this cup because
3 you can't tell the difference easily between compostable and
4 plastic, and so it all goes to the landfill.

5 And I'm curious -- it seems to me that would still be
6 a problem if we added compostable plastics to the list. You'd
7 have this distinguishing between plastic and compostable.
8 Could we go paper and then it'd be easily distinguishable and
9 you could recycle the plastic and compost the paper? It seems
10 like adding the plastic to the list wouldn't fully solve the
11 problem, but I'm curious. I'd like to get feedback on that
12 impression.

13 MR. DEWEY-MATTIA: No, you're asking a good question.
14 There's a lot of steps here. I think if things were -- in a
15 perfect world, we wouldn't have conventional plastic
16 contaminating the stream and we could just get the things we
17 asked for.

18 We know right now the majority of what the plastic
19 materials that end up in our compost are not compostable
20 plastics, they're conventional plastics that will end up in our
21 final product. Now, we have done studies on the
22 compostability, whether they break down. They tend to do well,
23 the products, as long as you manage them properly. But we have
24 to pull them out for -- there's two reasons why they get pulled
25 out. Now, one is that we can't allow them for organic

1 production and we can't make two types of compost. It's not
2 feasible. You have to have all organic or none and we would
3 like to have organic compost.

4 So the other part is that they're going to get pulled
5 out anyway because they act like plastics. That's the point of
6 them. But we know some of them don't get pulled out no matter
7 how you try. And so then you have a certain amount of material
8 in your end product. I'd rather not have pieces of plastic in
9 the compost. So we're not going to ask people to put plastic
10 bags in the compost to collect their food scraps. We'd rather
11 have it be something that if it made it through our systems, it
12 would degrade. But it's not a good answer.

13 This isn't -- something needs to change and that's
14 why we would like to be able to use compostable bags. But if
15 not, we'd have to figure out what to do differently. In the
16 long run, I mean, hopefully non-recyclable, non-compostable
17 plastic goes away.

18 I mean, that's like a little bit pie in the sky but
19 that would be the preferable thing because it's not good for
20 anything in this sense on our end. I mean, and there are ways
21 to use reusable things. I think there's, but there's also
22 going to be some single use products that have to be some type
23 of product that's discarded. And so some of that should go to
24 recycling, some of it should go to composting.

25 And that's kind of, in California, it's really up to

1 the producers to figure out with guidance from the state. And
2 maybe they'll make decisions based on the marketplace. And I
3 think we are a part of that.

4 So there's a lot, that's a long answer, but single
5 use cups are problematic, right? I think there's, you could
6 have a whole discussion about that, but I do think there are
7 certain uses that we see as beneficial. Fruit stickers, liner
8 bags, some food service, where whether or not cups decide to be
9 compostable, I think it would be nice if they just had glasses,
10 right? And that probably will end up being the thing, but
11 maybe it's not appropriate to use PLA plastic for that cup,
12 like we use PET and recycle it. That's just a decision that
13 gets made by the folks.

14 It's interesting in this realm, you have a very
15 unique person, you as a Board, and USDA on our policies in
16 California, which is unusual for a lot of these, all of our
17 other recycling, but it's okay. I mean, it's just the reality
18 because it's agriculture. And so it's tricky, your decisions
19 on kind of what to allow, but there's a lot of nuance that goes
20 into it. And that's why you see certain facilities deciding,
21 we don't want to take it, we don't want to deal with it because
22 at some point it just becomes too much.

23 And I think we would be -- and that's okay if you
24 want to make compost and not take any packaging, it's up to
25 you. If we want to kind of push the envelope a little bit

1 further and try to divert more material and know we have the
2 processes to take it, I think that's why we would like to be
3 able to accept it.

4 But I don't want, right, we don't want compostable
5 shoes, car bumpers, all of the packaging in the grocery store
6 to go from plastic to compostable plastic, that I don't think
7 is going to be a solution.

8 SECRETARY LEWIS: Dilip, you're next.

9 BOARD MEMBER NANDWANI: Thank you, Nate.

10 First, I'd like to thank you all the panelists for
11 enlightening us on this interesting topic of recycling and
12 composting. It's really very valuable to us.

13 I have a couple of simple questions, rather
14 clarifications or some information. Since the first question
15 is on bacteria, this is to Dr. Millner. And the second, maybe
16 you can, probably one of you can answer that or add some
17 information.

18 You know, in organic, at the compost we make, there
19 is a rule, 131 to 170 degree Fahrenheit, the temperature. So,
20 in a lot of compost, they use microbial cultures, as you know
21 that, and you presented also.

22 Nowadays, there are some GM bacteria also available.
23 And my question is that, are you aware of that, that if those
24 temperatures, if those microbial cultures, they use it, are
25 they going to go away during that high temperature? Or are you

1 aware of those any GM bacteria or fungus, maybe? And when they
2 are processed in recycling, would that be still there? Or, you
3 know, because that's known as a GM product.

4 The second question I have with you is that on C/N
5 ratio, have you done any study on your recycle, when you make
6 this organic compost, that C/N ratio is within that, you know,
7 the limit we have like 30 to 100. Probably you have done that.
8 So, this is just for, I'm curious to know about that. So,
9 thank you.

10 DR. MILLNER: As far as the microbes are concerned, I
11 myself am not aware that people are adding GMO-type strains to
12 inoculants. I know that there are a number of inoculant types
13 that are available. But I have not heard of any GMO
14 specifically.

15 So, if you have, please let me know. In terms of
16 what will survive the process, definitely spore formers, like
17 bacillus. And there are a number of other bacillus-like
18 organisms that form thermoduric spores. So those will survive
19 this process.

20 The other thing to remember about microorganisms that
21 come to the situation naturally, there's a whole lot of
22 different microorganisms that come into this. Now that we have
23 microbiome studies, you can see that there's just an
24 innumerable variety of different kind of microbes that start
25 and still finish.

1 There are organisms that remain and that's not
2 unusual. You want microorganisms to remain there to continue
3 doing the beneficial processes that they do in terms of
4 degradation of organic compounds and the whole turnover
5 process.

6 The big thing to remember about this is that when
7 you're trying to get rid of pathogens, either plant pathogens
8 or zoonotic pathogens, is there are lots of studies done on
9 looking in different parts of the pile, how much time,
10 temperature, and so on. But you're dealing with tons and tons
11 of material. And your analyses at the end of that process are
12 as good as the number and the quantity of the individual
13 samples that you're able to analyze. And there's limitations
14 to that.

15 You can't analyze 100 pounds of it all at once. Have
16 to do samples, multiple samples from different locations. And
17 so when you take that into account and you're looking at a risk
18 analysis, you come to there's no 100 percent chance that you're
19 going to eliminate everything. You can't be that sure. It's
20 acceptable risk. That's what your target is.

21 What's an acceptable risk? You're not saying it's
22 absolute. Does that help?

23 BOARD MEMBER NANDWANI: Yes, it did. Just, did I
24 hear correctly that you mentioned that spores can still be
25 there in that high temperature, right?

1 DR. MILLNER: Right.

2 BOARD MEMBER NANDWANI: Thank you. Very helpful.

3 MR. COTTON: Thank you for asking me the easier
4 question. I appreciate that. And I want to be really clear.
5 My colleague, Dr. Rink, and I have taught composting for the
6 last 18 years, both the week-long operator training course and
7 a one-day course that we teach. We've been fortunate to teach
8 it all over the world. And he would absolutely, 100 percent
9 tell you that C/N ratio is really, really important. And the
10 science is there. The science has been done. It's relatively
11 old science. But there is an optimum starting C/N ratio in
12 composting, 100 percent.

13 I don't, the biggest fights Bob and I get into, and
14 he is the more academically credible person, he's been doing it
15 longer. He edited the composting handbook. It's just my
16 opinion. I don't find starting C/N ratio to be very useful.
17 So having it in the NOP, having it repeated by OMRI, having it
18 out there in the field doesn't really help.

19 It's not frequently -- most, and there's a -- the
20 composting family is a big family. And we're really small
21 backyard composting to a small, the core of the NOP membership,
22 the smaller growers that might do some composting on their farm
23 to larger or medium-sized to giant composters. The science is
24 absolutely there. I just don't think starting C/N ratio is a
25 very useful metric. I'd much rather people focus on porosity

1 for airflow or pathogen reduction or getting the right moisture
2 content.

3 The only way you can know for sure what your C/N
4 ratio is to send it into a lab. If they're going to send a
5 sample into a lab, I'd rather they send a finished compost
6 sample for pathogen reduction, for nutrient analysis, for
7 growth testing and emergence testing if they only had one to
8 choose. So yeah, the science is 100 percent there. Bob would
9 hate me for advocating this. He is right, but -- and the
10 science is there. Again, a ratio of 30 to 1, and I could show
11 you some work from 30 years ago showing that you will volatile
12 -- you will conserve the nitrogen, particularly in a manure
13 pile. You'll conserve that nitrogen with a 30 to 1 or greater
14 C/N ratio.

15 But you could absolutely, I would bet, if Tim
16 measured his starting C/N ratio, which he doesn't, it would be
17 much higher than that, and they do fine when you're doing 60,
18 80,000 tons a year and more at Napa, or at, excuse me, at Yolo.
19 So it's just not a terribly useful metric.

20 MR. DEWEY-MATTIA: And we actually have to test it
21 once in a while for this reason. We don't test it --

22 MR. COTTON: Right.

23 MR. DEWEY-MATTIA: -- like, because it's part of the
24 requirements to be OMRI or CDFA list. If we have to send off a
25 test, and it's different, we send a finished compost test,

1 right? You take the samples from your finished compost pile.
2 It's all 3/8 inch minus. I mean, you're inbound feedstocks,
3 like trying to fill a five-gallon bucket. It's a challenging
4 thing because you have wood, you have a bag of food scraps, and
5 it can -- I don't know if it's really an accurate test.

6 MR. COTTON: It's not --

7 MR. DEWEY-MATTIA: Representative, it's accurate of
8 that bucket, but representative of a huge pile, it's very hard
9 to measure in any kind of way that's reasonably useful, just
10 because it's an initial measure of this huge, giant pile of
11 feedstock.

12 And so we thought it was always sort of a less,
13 because you could do one test sample, and it would be much
14 different, but it'd be lower than 25 to 1, and it wouldn't be
15 that -- it would be from the same area, and you could have gone
16 and gotten a different one, and it doesn't really have any
17 effect on what our finished test, because the finished tests
18 also test for C/N ratio as well.

19 MR. COTTON: Right. And composting is a really
20 forgiving process, and if you're not, if your C/N ratio is so
21 out of whack that you're not getting the temperature, you'll
22 know because you're not going to be getting the temperature.
23 So you're going to focus on other things than dialing in that
24 C/N ratio.

25 And sure you can look at lab values or book values,

1 there's an appendix to the composting handbook with 7,500
2 carbon-nitrogen ratios, but it's just not something we focus on
3 when we teach the -- I've been teaching week-long compost
4 operator training classes across the U.S. for 15 years, and
5 it's not something we talk about. We talk about finished C/N
6 ratio, which is really important for ag application, sort of
7 nitrogen, lots of other things, but again, if you only had a
8 budget to do one test, I would much rather see that test at the
9 end of the process for pathogens, for nutrients, for compliance
10 with physical contaminants, metals, micronutrients, salts, pH,
11 organic matter, et cetera, so one better lab test than
12 starting.

13 If you're -- it's a good BMP -- again, science is
14 there, it's a good BMP, it's something we teach religiously,
15 and the finishing slide of our second lesson is C/N ratio 30 to
16 1 or 40 to 1, I get that, but having it in the rule, I think,
17 is probably not terribly useful.

18 BOARD MEMBER NANDWANI: Just for the record, BMP is
19 best management practice, right?

20 MR. COTTON: Yeah.

21 BOARD MEMBER NANDWANI: Thank you. Yes --

22 DR. MILLNER: I just was going to add to this, is
23 that with the pathogens, even though you're getting to an
24 acceptable level if you go through the process the way it's
25 prescribed, that doesn't mean that if there's another inoculant

1 that comes into that, a bird flies over, or a fox visits the
2 pile top in the evening, or some other intrusion that you're
3 not expecting, and that brings salmonella in there. It doesn't
4 mean that that can't regrow, and that depends to a great extent
5 on the moisture content that's there and the soluble carbon and
6 nitrogen that's available. In order for that to regrow, it
7 needs an acceptable type of soluble carbon. All that insoluble
8 carbon doesn't help salmonella, E. coli, or listeria. They
9 have very specific requirements.

10 So it needs to have some other evaluation at the end,
11 in addition to just the end point. Is it a carbon-nitrogen?
12 Is it -- what's your value for -- do you find a certain number
13 of E. coli, or whatever measure you're going to implement. It
14 reflects more the end product quality if you're looking at how
15 are you going to use that, and that ties into, as well, what
16 happens when you apply that for your plant production system?

17 It's remembering that you're mixing it with soil.
18 Whatever is in that soil is going to see those nutrients, too.
19 And that could be plant pathogens that are still in that soil,
20 or it could be some incidental salmonella, or whatever other
21 bug that happens to have been in that soil. If it sees soluble
22 carbon, it can regrow.

23 What's the most obvious source of soluble carbon in
24 that soil where you've got your plants? It's the roots.
25 They're constantly exuding nutrients, soluble nutrients that we

1 know bacteria love.

2 BOARD MEMBER NANDWANI: Thank you for scientifically
3 explaining that answer. I appreciate it.

4 SECRETARY LEWIS: Okay, we've got Amy, then Kyla,
5 then Nate, then Mindee.

6 Go ahead, Amy.

7 VICE CHAIR BRUCH: Thanks, Nate. I had several
8 questions, but the first one that I'll ask here in the queue
9 would be probably targeted to Doug, and maybe Pat, with your
10 expertise in pathogens. Kind of continuing on with the testing
11 and research, OMRI requires lab analysis from compost
12 producers, and we mentioned the leafy green marketing
13 agreement.

14 There was a public comment that said that the leafy
15 green marketing agreement has tighter windows of acceptability
16 for these pathogens compared to the NOP guidance right now. Is
17 that something we should look to mimic the leafy green
18 marketing agreement for those standards on pathogens, and
19 update that piece for food safety?

20 DR. MILLNER: For leafy green production, or herbs,
21 or certain other commodities like cantaloupe production and
22 that sort of thing, where we know there have been incidents of
23 recalls and foodborne illness outbreaks with certain types of
24 commodities, it's a whole system, so it's not just the product
25 or the compost that's added, or whatever other soil amendment

1 is added, but it's a whole process that they use, and there's
2 some studies that show it has to do with the type of
3 cultivation that they're using, because the type of cultivation
4 can throw some of the soil, amended soil or whatnot, up onto
5 the plant, and it gets into the core of, let's say, a romaine
6 lettuce seedling, and it remains there during the whole
7 production system, so it's not just the product, it's the whole
8 system. So I don't want to pin it on one thing like that, but
9 they have taken this into account when they're looking at how
10 that production system is operated in a variety of places in
11 California, because they've seen it in action.

12 I know that's not a final answer for you, but that's
13 the reality of it.

14 VICE CHAIR BRUCH: Okay, thank you. That's helpful,
15 and so I appreciate that.

16 SECRETARY LEWIS: Kyla?

17 CHAIR SMITH: Yes, hello. So I think I heard Matt in
18 his presentation say, like, you do you, California will figure
19 it out.

20 So, I think my question's for Tim. Like, come
21 January 1st, 2026, like, what does that look like for you, if
22 we keep things the same?

23 MR. DEWEY-MATTIA: Right, so if nothing changes, the
24 rules are the same. The first change that happens is that you
25 can't -- if it's anything that's not on the allowed list, no,

1 it wouldn't, so any compostable plastics or any non, any paper
2 that's not, you know, newspaper or recycled paper, wouldn't be
3 able to have a compostability, compostable label on it.

4 Right, so there'd be no labeling allowed on any of
5 these things that we see as certified compostable. Like, that
6 would be -- so that paper cup could still exist in California
7 for a little while, although I'll get to that, but it won't be
8 able to have the BPI logo on it, or anybody else's logo. I
9 think then what will happen in the next five years is that
10 since it's not recyclable or compostable, it will be banned by
11 SB 54. So that's the packaging law.

12 So that's what happens. So what will happen to us as
13 a recycler or a composter? We will have to figure out what the
14 guidance is, kind of based on what still exists and what we
15 accept, and we won't accept these things because they won't be
16 called compostable. This is most likely, right? So then it
17 won't be a compostable item anymore. So all these things that
18 are compostable products will probably go away.

19 That's my guess, but we don't know yet. So it's
20 interesting to -- it'll be interesting to see how it works out,
21 but that's the kind of most obvious.

22 SECRETARY LEWIS: Go ahead, Nate, and then Mindee.

23 BOARD MEMBER POWELL-PALM: That was my question.

24 But, Matt, is there a conversion factor for, say, how much a
25 ton of cattle manure becomes compost? Like what that ton to

1 yard conversion is?

2 MR. DEWEY-MATTIA: Yes.

3 BOARD MEMBER POWELL-PALM: And one you could share?
4 And I'm just trying to make sense of these numbers.

5 I want to just build off Brian's line of questions,
6 where are we really not talking about the right stuff? If
7 we're going to be growing organic acres in California, is it
8 really going to be a factor of cattle manure and orchard waste?
9 And this is something that is impactful for other reasons, but
10 not necessarily to be the nutrient source for agriculture.

11 MR. COTTON: Yeah, great question, great
12 clarification. I hadn't really looked at it from that
13 perspective. That's why these meetings are so awesome, because
14 different people, different perspectives can look at it in a
15 different way.

16 And I don't think -- I don't know what organic
17 growers, again, it's a massive state. We have organic growers
18 all over the state growing all sorts of different things in all
19 sorts of different ways, with different ways to amend their
20 soil and provide fertility. So there are plenty of them that
21 use manure, and there are plenty of them that use compost from
22 Tim's facility or any one of the other hundreds of facilities
23 we have.

24 So this affects, at the moment today, 35 or less
25 facilities. But we have ambitious plans to divert more food

1 scraps. There's an awful lot we think we can divert.

2 We expect -- I expect more of that to go to
3 composting than anything else. So one person -- there was a
4 really interesting article in the Fresno Bee, the heart of the
5 Central Valley, that said 13, because 13-3, weirdly, 13-3 is
6 not universally beloved throughout the state. Seems very
7 ambitious, especially if you're living in one of the rural
8 areas or not in the Bay Area or Los Angeles.

9 But there's a great editorial in the Fresno Bee that
10 this increased availability of food scraps and compost will
11 actually drive the price of compost down. So that is good for
12 farmers, organic farmers, international farmers, everybody. So
13 I expect the availability of compost to increase, but it's a
14 fair question, and it's one we don't -- I think Tim mentioned
15 it really well, we tend to put these materials in certain silos
16 and for years, the work that I did and to some extent Tim does,
17 if it went to a landfill, then we worried about it. If it
18 didn't go to a landfill, it wasn't on our plate, that was
19 somebody else's problem.

20 So yeah, we've asked several times. My colleague
21 Neil Edgar with the California Compost Coalition has asked to
22 do -- asked the state to do a larger organic inventory because
23 we have all sorts of organic materials we could look at, we
24 should look at the big picture.

25 But I think the manure is more managed because it

1 happens, most of it is already in the agriculture area, it's
2 dairy adjacent or on the dairy or close to. If you haven't
3 been to California, please come out, please come spend your
4 tourist money in California. Take the train from Sacramento to
5 Bakersfield and you will not have a minute where you're not
6 watching a vineyard or an orchard or an organic farm or
7 something going by. The range of our organic production is
8 astonishing.

9 So I don't think it's an either or, it's a yes and.
10 So we are composting more manure, we will continue to do that,
11 we're going to compost more food waste, going to continue to do
12 that. We're putting compost on rangeland which is something we
13 didn't talk about even 10 years ago. So the news is great and
14 it's a golden age for compost research. We're doing more
15 research, pure academic research at Davis and Merced and
16 Berkeley and UC Santa Cruz than we've done in years.

17 So we're really looking at, largely that's due to how
18 to grow plants better and what are the impacts of climate
19 change. What happens if you have less water? What happens if
20 it's a heating climate? So we're doing some really important
21 work right now and this is a small detour on that road but it's
22 an important one because we're always going to send -- a lot of
23 this material is going to go to ag, whether it's certified ag
24 or other ag.

25 So I probably didn't answer your question.

1 BOARD MEMBER POWELL-PALM: Well, I could tack one
2 thing onto that.

3 MR. COTTOM: I should mention too -- I apologize.

4 1383 definitely deals with, again, you only know the
5 space you're in. I deal with the waste side of it, the organic
6 waste side of it, the carbon based waste side of it. There's a
7 whole part of 1383 that deals with areas I don't really know a
8 lot about.

9 So we're not looking at just one piece of that. It's
10 a whole system. There's a part about carbon black and reducing
11 that. Again, not my space but.

12 BOARD MEMBER POWELL-PALM: Sure, sure. Kind of a
13 little higher level and I hope this isn't a useless question
14 but is there a reason that in thinking about where compost goes
15 that it has to go to our food, as opposed to all the other
16 biological eaters, lawns, roadsides, other places to think
17 this. Why do we have to divert something that is concerning
18 right to the source of something that we're going to re-ingest?

19 MR. COTTOM: Man, I can't thank you guys enough for
20 ever inviting me to this because I love -- that's a brilliant
21 question. I love that question. I have no idea what the
22 answer is. I guess we don't. And in most other states, I want
23 to be really clear, that data that I showed in California, the
24 pie chart, that's work I did for CalRecycle in 2019, that is
25 unique to California. That is not the case in most other

1 states. Even in Washington, most of their ag is on the other
2 side of the Cascades. You can't take urban compost over those
3 mountains and get it, in most cases, to the apple farms of
4 eastern Washington.

5 So in most cases, we don't. Do we need to? No.
6 Does it provide a great source of stabilized organic matter?
7 Absolutely. I don't share the fear that there's more risk than
8 there is reward. I think the use of compost, I think we could
9 have banned all organics from landfill just for the water
10 holding capacity benefits alone. There are so many benefits
11 and co-benefits of keeping it out of the landfill, putting it
12 on soil. I think the risks are real, and we face them with
13 science and determination and USDA and our good friends at UC
14 Davis and other places, and they generally don't prove to be
15 fatal.

16 We aren't seeing -- you know, Pat knows way too much
17 about pathogens and leafy greens and other things, but in
18 general, we're not seeing, most of the food scares you see, let
19 me predict, sometime in November, there's going to be an E.
20 coli scare in romaine, somewhere that came from Arizona. It
21 happens almost every year. Nothing to do with compost.

22 Turns out there's a lot of people picking that stuff,
23 and there's one porta potty way over there in a thousand acres,
24 and there's a whole lot of sources for that. Compost is rarely
25 one of them.

1 BOARD MEMBER POWELL-PALM: And I'll clarify my
2 concern being more the plastic and the PFAS from the plastic,
3 rather than the pathogens

4 MR. COTTON: Yeah. Yeah, if you're not for zero
5 plastic and compost, how much plastic are you for? I'd love to
6 get all of it out, 100 percent. And I think most of the
7 composters would too.

8 BOARD MEMBER POWELL-PALM: Thank you.

9 DR. MILLNER: Well, there are other uses of a lot of
10 compost is, and they're probably out here in the East. I don't
11 know so much about California's situation, but the Department
12 of Highways in different states are using a lot of compost for
13 renovation of very slopey areas, the socks that people are
14 using for catchment wash off from lots of different spaces,
15 pavement, and macadam type things to catch before it goes into
16 the drains out into an open waterway.

17 BOARD MEMBER POWELL-PALM: And so if we could have
18 rewritten 1201, it would have been that -- not that it gets
19 banned if it can't go to organic, it just could go somewhere
20 else. But right now there's nowhere else for it to go by the
21 law. Am I understanding that right?

22 MR. COTTON: Well, let me see if I can add some
23 clarity to what Tim said in the hypothetical that if 1201 being
24 what it is and the NOP decides to do nothing and just keep it
25 status quo, we will continue to make compost and we'll continue

1 to make compost out of food waste, we'll continue to make
2 compost out of manure, continue to make a lot of compost out of
3 yard waste. And it doesn't have to -- where it goes is a
4 function of what markets are there locally and what's
5 available. We do sell a ton to Caltrans. They're up to like 5
6 percent now statewide, which has taken decades to get there.
7 We worked really hard to do that.

8 But we're not -- what 1201 is acknowledging is that
9 composters want to sell into organic. Selling to organic is
10 very important to them. It's valuable. And just as much as
11 it's valuable to organic farmers to have a local source of
12 compost available.

13 You know, Tim happens to be in an incredibly
14 privileged place of the Napa Valley, which just lowers my blood
15 pressure every time I drive up there and just see the grapes
16 growing on the hillsides and it's fantastic. And they're using
17 more and more compost. They're making their own compost.

18 So no one is required to buy or use any compost.
19 We've just developed this thriving, incredibly successful.
20 It's the single most successful thing we've done in recycling
21 in 30 years because we've taken urban organics and put them on
22 agriculture and really smart people were hired by CalRecycle in
23 the '90s that told us we could never do that.

24 And it's been incredibly successful and the benefits
25 are there. It doesn't have to go on organic and there's

1 absolutely no organic farmer that has to buy any compost from
2 anywhere. They can make their own. They can buy it from this
3 user or that user. It's a big free market there. No one's
4 going to be required to do -- to put compost anywhere. We're
5 not forcing anyone to. We're giving them the opportunity in
6 this abundance that we have and the societal benefits of
7 keeping these materials out of landfills. And it's a co-
8 benefit, but again, we probably sell a lot more.

9 I think we said 5 or 6 million tons of compost to
10 agriculture or total. So 60 percent of that's to ag. I don't
11 know what the percentage is to organic ag, but they have lots
12 of sources of fertility they can use. So they could completely
13 balance. And let me --

14 SECRETARY LEWIS: Hey Matt, I'm going to interrupt
15 and just have Tim add into this and then we've got a -- still
16 have a queue and about nine minutes left.

17 MR. DEWEY-MATTIA: Just one thing, because we talked
18 about PFAS and that's banned from any food service ware
19 already. That's -- so it doesn't matter if it's compostable
20 plastic, compostable plastic, a lot of those are actually in
21 paper, right? And fiber based.

22 So it's not allowed in any type of food contact
23 material. So 1201 actually, there's no -- there isn't -- I
24 mean, sure something could get in there that's illegal, but it
25 wouldn't really affect PFAS, right? PFAS unfortunately are

1 everywhere in the environment now, but actually any type of
2 material, they're banned from all packaging as well.

3 So this actually won't affect that part of it since
4 that would just be about whether it allowed for organic or not,
5 but PFAS is allowed in nothing.

6 SECRETARY LEWIS: Thanks -- thanks, Tim.

7 Okay, we've got a long queue and nine minutes
8 scheduled, which we may run into some of our break, but I just
9 want to keep everyone pithy in the words of our former chair.
10 So I have Mindee, then Franklin, then Allison, then Amy, then
11 Wood, and then Kyla.

12 And we'll be hard pressed to get through this, but
13 let's do it. Like I said, it's always a good time to talk
14 about compost.

15 BOARD MEMBER JEFFERY: So Matt and Doug, Doug in your
16 comment, there was a reflection on the windrow requirements for
17 the 15-day turning. And then, Matt, in your slide, I saw how
18 low the windrow numbers were. Like the number of systems using
19 windrows was like 19, I think you said, and composting other
20 was 184. Did I get that wrong?

21 Either way, question will be the same in a way,
22 because my question is the 15-day requirement seems like a
23 little bit of a barrier if we're interpreting it as 15
24 consecutive days. And so I want to hear from your expertise
25 and what you teach at U.S. Compost Council about that

1 requirement. And also, Doug, if you can unpack your written
2 comment, you guys are following me.

3 MR. CURRIER: Yeah, so any compost that's marketed as
4 a windrow compost is going to get that 15-day and 5-day
5 turning. If it's not marketed that way, it can go in the
6 compost other. So that's three days above 131. And so that
7 was the slide that had, I think, 184 or so products that are in
8 that other category.

9 We've got a much smaller amount in windrow, and those
10 are only there because they're marketing their products as
11 windrow. Same goes for static aerated pile. That's taken
12 directly from 203. So 205.203 talks about windrow static
13 aerated pile and the NOP guidance goes further to clarify there
14 are other methods that reduce pathogens and can stabilize, get
15 stable compost.

16 BOARD MEMBER JEFFERY: And is it generally
17 consecutive days, the requirement?

18 MR. CURRIER: No. I don't -- yeah, I think --

19 MR. COTTON: The answer's no.

20 MR. CURRIER: So three days, yes. 15 days, no.

21 BOARD MEMBER JEFFERY: Right, so it's three days in a
22 row at temp, five different times, but it doesn't have to
23 happen in 15 consecutive days.

24 MR. COTTON: Correct.

25 MR. CURRIER: Yes, that's right.

1 MR. COTTON: The basis for all that is 40 CFR part
2 503. It's three sentences. One is for aerated static pile,
3 two is for windrows. It doesn't use the word consecutive.

4 MR. CURRIER: Yeah, okay.

5 SECRETARY LEWIS: Pithy.

6 MR. CURRIER: Yeah, and we require consecutive for
7 three days because we think compost --

8 BOARD MEMBER JEFFERY: Yeah, three days
9 consecutively, but five times in only a period of 15 days.

10 MR. CURRIER: Right, yeah. Yes.

11 DR. MILLNER: And taking the sample after the turning
12 is good to do that because you've got this mixing, and you're
13 not just isolate -- taking from isolated samples.

14 SECRETARY LEWIS: Go ahead, Franklin, and then I'll
15 amend the queue so Wood, who has yet to ask a question, can
16 interrupt. So it'll go Franklin, Wood, Allison, Amy, and then
17 myself will hopefully wrap up there.

18 BOARD MEMBER QUARCOO: I'm trying to put my finger on
19 the main motivation for this. Is this a way to find an outlet
20 for compostable plastic or there is an actual need in the
21 organic compost industry for it? Is this not going to be
22 another layer of purity test where people say, okay, mine has
23 it, mine doesn't have it kind of thing in the organic industry?

24 MR. DEWEY-MATTIA: Yeah, obviously, maybe people have
25 other thoughts on this. For us, it's a way to have actually

1 less plastic in our compost, I think, and to get more food
2 scraps. So we actually, I know, and believe me, I'm sure there
3 are just, I'm not naive, I know there are companies out there
4 trying to sell products into the marketplace.

5 I do think that in certain usages, it's a better
6 alternative to conventional plastic. So that's on our end, so
7 that we can make our product and make more of it and make it
8 clean and healthy.

9 BOARD MEMBER QUARCOO: That's the impression that I
10 get, that it's a better alternative, not necessarily that it's
11 a good option, is that it?

12 MR. COTTON: It's definitely not necessary. I think
13 it's a tool that some manufacturers use, and there's an
14 assumption or a belief that in using, say, a liner in your
15 kitchen, you will get more people to participate in a food
16 scraps program, and it's sort of blossomed from there. But
17 it's absolutely not necessary.

18 We've been composting food for decades in California
19 without compostable plastics. They're just a tool, and they're
20 either a benefit or a hazard. In the short term, not enough
21 places to take them. They're too hard to identify, and they
22 disqualify you from selling to organics. So at the moment,
23 they're probably more of a hazard than a benefit for most
24 composters.

25 But just to be really clear, the last point I wanted

1 to make, there are plenty of composters that don't touch this,
2 don't have to do -- I've got plenty of clients that don't,
3 they've looked at food waste, they see all the adjacent plastic
4 and say, you know, thanks, let someone else do that.

5 The majority of composters in California don't handle
6 food. It's a relatively small club. So it's a choice that
7 people make, and then with that comes other opportunities,
8 responsibilities, I don't know what you want to call it, but I
9 hope that answers that question.

10 SECRETARY LEWIS: Go ahead, Wood.

11 BOARD MEMBER TURNER: Go ahead, Wood. I'm curious,
12 Tim and Matt, if you have any, from your networks, if you have
13 any insights into how much money's been spent in kind of the
14 composting world to handle contaminants, to pay for labor, to
15 develop ostensibly biodegradable materials or compostable
16 materials.

17 I'm just curious about the order of magnitude that's
18 gone into the handling of materials and the creation of
19 materials that theoretically could be handled by that system.
20 And the reason I'm asking the question is because I feel like
21 we've given up on the recycling. We've given up on recycling
22 in this country. And I'm curious if I'm right or wrong about
23 that, because I'd actually rather see -- I think I'd rather see
24 us deal with the plastics, actually put the plastics in the
25 recycling bin, put the right plastics in the recycling bin, or

1 have the right system for the plastics in the recycling bin and
2 leave this stuff alone.

3 So I'm just curious if I'm right about that, wrong
4 about that, and if you have a sense of that number.

5 MR. DEWEY-MATTIA: I mean, not enough, we haven't
6 invested enough in it. I think that's the first thing. Like
7 as a society, I think it would be good to invest more in it.

8 What -- we've invested tens of millions of dollars,
9 we as like our government partners and us as a company in the
10 last decade to upgrade our operations to make them able to
11 handle, for environmental compliance, but able to handle a wide
12 range of materials. And this is both in recycling and in
13 composting. So we've done 20-plus million dollars of upgrades
14 in our recycling sorting to deal with the changing material
15 stream.

16 And it's challenging. There's a lot of weird
17 plastics in there. There's also more cardboard than there ever
18 was. So you have to kind of tweak your whole systems.
19 Cardboard is good, we can recycle it. But when you go through
20 all this, you realize there's certain things that are never
21 going to be captured in recycling. It's just that plastic is a
22 problem, especially some of the low grade things. They have a
23 very low value. The whole point of them in the first place was
24 to make single use things out of petroleum, like in natural
25 gas. It was never, that's the idea. And recycling them into

1 something new sort of defeats the purpose by the petrochemical
2 industry.

3 So I think you realize when you look in the recycling
4 that there are some things we would need to spend more money on
5 capturing and figure out packaging, but also some of the stuff
6 needs to get out of there.

7 Now I don't want to just stick all that in the
8 compost. But I was thinking about this about certain things.
9 I mean, soiled paper, like napkins, something we can compost,
10 not really recyclable. You know, I was looking at the coffee
11 pods. Like, is this compostable one going to be the thing that
12 finally gets us that? I don't know.

13 But you look at it, and then on the flip side, right,
14 in composting, it's we need to try to reduce the contaminants.
15 And I think there are certain things that we know are going to
16 exist. And I think some of them are more -- we see there's
17 more of a chance of us doing something with them in compost.

18 And some of that is so that it's not in the recycling
19 stream. But really, the biggest thing here for us is to be
20 able to get more of the big piece of the pie, right, and get
21 that into compost instead of the landfill. So it's all --
22 we've put a lot of millions of dollars into it. But I think
23 what has to happen now is that the packaging folks need to kind
24 of take this on. And we've given them that as part of the
25 statute in SB54 to figure out what can actually get recycled

1 and composted. And we'll be there to take stuff that we want
2 or that they'll pay us to take or that we can take. But it's
3 not up to us to kind of keep figuring out a way to spend more
4 money to solve their problems.

5 SECRETARY LEWIS: Allison, and then Amy, and then
6 myself.

7 BOARD MEMBER JOHNSON: Thank you. I'm going to
8 direct these questions at Doug, but welcome anyone else to
9 weigh in too.

10 Following up on Kyla's question earlier about these
11 cups and paper generally, Tim, you mentioned the pizza boxes.
12 Are any of those allowed currently in organic compliant? I
13 know we have newspaper on the national list. Are there other
14 paper products that are currently okay? Or would that whole
15 world need to be addressed?

16 MR. CURRIER: Yeah, there's other recycled paper
17 component on the national list. We look at like wax cardboard
18 and, you know, cardboard with, you know, glues and things like
19 that. Do you guys see pizza boxes like that?

20 I don't think we've, yeah. So, yeah, I think the
21 other recycled paper is a very, you know, liberal. I think we
22 look at that liberally.

23 BOARD MEMBER JOHNSON: Yeah. And then the follow-up
24 question is, you mentioned contamination in the air quotes.

25 MR. CURRIER: Yes.

1 BOARD MEMBER JOHNSON: What are you doing? I buy
2 organic compliant compost bulk bags. It all has glass in it.
3 Like where are you looking at as a threshold? Or what do we
4 do?

5 MR. CURRIER: Yeah, and so one thing I didn't talk
6 about is our foreign feedstock removal. And we are identifying
7 some things as high risk. So municipally collected on
8 clippings, food waste.

9 So we're requiring foreign feedstock removal prior to
10 composting. So before you're hitting that pile, we're wanting
11 people to ask, or we're asking people to describe how they're
12 removing contaminants. It is not 100 percent.

13 So we also see people screening, although I'm hearing
14 perhaps that's less of a thing these days, but screening final
15 compost. And so that's also a method. And when we get
16 complaints, we're following up with a corrective action plan
17 for folks.

18 So if someone is finding things like glass, bottle
19 caps, things like that, they can tell us and we can work with
20 the company to identify a source cause and what they're going
21 to do about it. But that said, it's not perfect. And so
22 bigger composters have targets of very small amounts of
23 contaminants, but they're still going to be there.

24 MR. COTTON: Just to add really quickly, in
25 envisioning our ambitious food waste reduction goals, the state

1 implemented a physical contaminants limitation in finished
2 compost that every commercial composter has to meet in
3 California, but that's one of the only states that has that.
4 And it's a good start, but it's not -- it's less than four
5 millimeters, so if you screen it fine enough, you're, you know.

6 It's a start, it's very new. You know, again,
7 regulating this on-farm practice into a commercial compost
8 manufacturing industry is fits and starts, and we're getting a
9 lot better, but we have a long way to go, so.

10 SECRETARY LEWIS: Go ahead, Amy.

11 VICE CHAIR BRUCH: Yeah, thank you, Nate.

12 Matt, this is a follow-up on one of the points you
13 made in your presentation. You mentioned retailers are
14 incorporating more and more compostables into their -- just
15 what they sell. What's the percentage, or just kind of a gut
16 feel for the push for certified compostables with those
17 retailers? I haven't heard too much of talk about the
18 certified compostables.

19 MR. COTTON: Yeah, I don't know, and Rhodes Jepson
20 from BPI is sitting right over there, and I don't know if he
21 knows the answer to that. And he would, if anyone knows,
22 Rhodes would know, and I don't know he knows that either. Of
23 the total world of compostables, how much is certified
24 compostables? I mean, BPI has taken the lead on trying to
25 police the industry, but they influence the people they

1 influence. But there's a big world out there of -- a lot of
2 these companies are not small companies. They're international
3 chemical companies, so it's really hard to track, because they
4 might make a resin, like NatureWorks, which is a subsidiary of
5 Cargill, makes PLA, it's probably the single biggest
6 compostable plastic we make in the U.S., but they just make the
7 resin. They don't make the forks, the plates, the cups,
8 wherever it is. So they -- we don't track that well. In
9 Europe, the European Bioplastic Agency does a better job
10 tracking their stuff, but we don't track it very carefully.

11 So I don't know the answer to that. But I suggest
12 you follow up with Rhodes. He might know.

13 VICE CHAIR BRUCH: Sure, same. Okay, thank you.

14 SECRETARY LEWIS: All right, I'm going to go to one
15 of the topics that I've been telling my fellow Board members to
16 do, which is channel their inner fruit sticker, and focus on
17 that for a minute. I know it's a headache for composters, and
18 as I mentioned, I make my own compost on my farm. I collect
19 food waste from exactly one kitchen, and somehow, fruit
20 stickers still make it through, even though I peel them off
21 every single avocado.

22 So I had a question for Pat about whether you got a
23 sense on the timeline for the availability of a compostable
24 fruit sticker that the industry will accept. Did you get any
25 sense around, is this five years away? Is this a pipe dream --

1 your microphone?

2 DR. MILLNER: I couldn't get a sense from talking
3 with Dr. McManus about a timeline. They've done what they
4 think are -- they're getting down the right track now. They're
5 close, but he wouldn't commit to a particular timeline.
6 There's some obstacles still in the way. They're technical
7 obstacles.

8 SECRETARY LEWIS: But it sounds like he's optimistic
9 it will work.

10 DR. MILLNER: Yes, I think that they are optimistic,
11 but they just need more time, and they've done a lot of
12 combinations so far, and they're progressing.

13 MR. COTTON: Just a really quick comment on that,
14 because I've actually seen compostable fruit stickers. I have
15 no idea where I got them. Someone sent them to me, as people
16 do with this stuff.

17 But just because you can make it, and this is true of
18 all the compostable plastics, doesn't mean it can travel
19 through our system and we can deal with it. It's not going to
20 come off in a de-packager, so the fruit sticker may be the one
21 unique situation. But it'll be great if USDA can make and
22 provide an open source a system for that. But then you've got
23 to convince every packer, every shipper, every boxer to use it,
24 and at what cost.

25 SECRETARY LEWIS: Yeah, adoption is clearly, you

1 know, the first step is getting the stuff. The second step is
2 adoption. And I think this really gets to a question, but sort
3 of a follow-up question, which is for Doug.

4 And this relates to, let's say we get to these
5 milestones. We have something that's functional. The Apple,
6 and I'm from Washington, the Apple industry says, yeah, it
7 works in our systems, and we still want to continue selling
8 fruit to Seattle, who has played around with a non-compostable
9 fruit sticker ban because of its commitment to composting.
10 What happens then in the organic space? If you know all this
11 pre-consumer food waste will have a compostable fruit sticker
12 on it, does that have implications in terms of its allowance in
13 an organic system?

14 MR. CURRIER: Yeah, I mean, I think it comes down to
15 our agreed-upon allowance for food waste, and knowing that
16 those are going to be in there, and being okay with it.

17 SECRETARY LEWIS: Fair enough.

18 DR. MILLNER: Yeah, I would just add, in talking
19 about the commercialization of it, is that Dr. McManus has been
20 working with a commercial company, and they've confirmed to me,
21 too, that they've made a lot of progress, and they do see this
22 as a resolvable problem.

23 SECRETARY LEWIS: That is very encouraging. And I
24 think that's a good frame of reference, Doug, that we need to
25 take to heart, which is that it will be something we need to

1 consider on whether we want to allow it into our organic system
2 or not.

3 MR. CURRIER: Yeah, because I think they're there
4 now, as you're pointing out, and they're ending up in compost.
5 So they might get screened out, they might not. And so food
6 waste in itself is allowed. And so these are just coming along
7 for the ride.

8 SECRETARY LEWIS: All right, well, I think we will
9 wrap it up only 10 minutes late, so that's really great.
10 Again, I think it's always a good time to talk about compost.
11 I want to thank our panelists.

12 We do have some modest gift bags for you, probably
13 some snacks to get you home safely and nourished. But again,
14 let's just give a round of applause to our panelists, and thank
15 them very much for their coming to the meeting today. And I'll
16 turn it back over to Kyla.

17 CHAIR SMITH: Okay, everybody, we're at break time.
18 We are going to come back at 3:50. Enjoy your break.

19 (Recessed at 3:40 p.m.; to reconvene at 3:52 p.m.)

20 CHAIR SMITH: Okay, welcome back, everybody. We are
21 going to finish our day hearing the rest of the items on the --
22 or doing the work of the Crops Subcommittee. So I'm going to
23 turn it over to Logan, and she -- because she is the chair of
24 our Crops Subcommittee.

25 So Logan, take it away.

1 BOARD MEMBER PETREY: Hi, can everybody hear me okay?
2 Great.

3 I want to thank Mindee and Nate for that compost
4 panel, for the discussion document, for everything that you
5 guys are doing. I know a lot of people are praising you, but
6 we can't stop. So that was a lot of work. It's a complicated
7 issue.

8 Okay, getting on to parts of crops, I want to start
9 off, we're going to have a proposal. Carbon dioxide's actually
10 my material. And then on the agenda, we have a discussion
11 document. We're going to put that at the end to talk about
12 compost more. We're going to go and get the sunsets done, and
13 then just keep on talking about compost, because we love that
14 topic, and we can't get enough.

15 So do we need to make any kind of motion on that, or
16 just roll with the schedule?

17 CHAIR SMITH: No motion, just, we're good.

18 BOARD MEMBER PETREY: Okay, so we're going to start
19 off with carbon dioxide.

20 So just a little brief history, because this thing
21 has a history, even though it's not even on the list yet for
22 crops. It was my first proposal, came on in 2021, and it was
23 petitioned to the Board in late 2020. And I took it on as a
24 proposal, didn't know what I was doing to begin with, but I
25 have learned a lot through this guy.

1 So the history there, it was petitioned at 205.601(a)
2 and (j). So as an algaecide disinfectant, and also as a plant
3 or soil amendment. And through the confusion of that, with me
4 being very new, we passed it, or we got to the fall of 2021,
5 and passed it, or classified it as a synthetic.

6 And I did not decouple the (a) and (j), and so we
7 kicked it on to the next meeting, and we did get it passed at
8 the listing for (a), because there was sufficient information
9 within the petition that we understood. There was not much
10 information at all for the listing at (j). And so, and then we
11 requested a limited scope TR, which we got in 2023.

12 So going through that, Crops Subcommittee, we've gone
13 through that, and gone through with this proposal. So I'll go
14 over that with you all.

15 I do kind of want to go back to the petition, just to
16 kind of go through what it was petitioned for, and the listed
17 use. And so going back to it, it says ECO2mix is submitting
18 this petition as a request to allow synthetic carbon dioxide to
19 be used without restrictions to adjust water pH to be used in
20 irrigation and for spray over plant leaks.

21 And then going to the intended or current use of the
22 substance, it listed -- said carbon dioxide is used in water pH
23 adjustment process. Water pH adjustment is common practice in
24 agriculture. Irrigation water sources are usually alkaline
25 with bicarbonates. This requires some form of pH control to be

1 used in irrigation. Water pH cannot drop below a pH of 5.0
2 when carbonic acid is used.

3 And then going down to, I guess, part four, it would
4 be a list of the crop, a list of the crop, livestock, or
5 handling activities for which the substance will be used. It
6 lists that carbonic acid will be used on almost every crop,
7 especially those that are under drip, micro sprinklers,
8 sprinkler, or pivot irrigation that requires water pH
9 acidification and bicarbonate neutralization.

10 And the last paragraph of that says the water pH
11 adjustment process can be manually controlled as well as
12 automatically controlled.

13 And I'm just going back to say all that just because
14 in the petition, this is the information that was given. And
15 so as we go in and we're looking at how is it used for, as a
16 soil amendment, I remember calling the petitioner early and
17 just trying to gather some of that information, you know, how
18 is that used?

19 And I do remember in that conversation saying that
20 because it would be used over the plant leaves or it would be
21 used in the irrigation water, it was assumed that it would be
22 needed as a crop input because it was also going into the soil.
23 So, and then when we requested the limited scope TR for the
24 plant or soil amendment listing, it listed only for indoor
25 production. So if it were listed this, it would be in

1 greenhouse production.

2 But within the proposal, you know, we state that it
3 is a synthetic, it's adverse environmental impacts, this
4 material is a by-product of other processes. It enters the
5 carbon cycle, gas -- CO2 is stable in the atmosphere and
6 absorbs heat causing greenhouse effects. But this is used from
7 by-products. It's not like we're creating more CO2. A human
8 health exposures to 1 percent can cause some poisoning, but
9 greenhouses that are amended with it have concentrations of 0.1
10 percent. So no concerns there.

11 Alternatives, there are no alternatives. There are
12 some non-synthetic sources, but they are -- the infrastructure
13 is not there for the mass production that's needed for
14 greenhouses. Availability is low. QCS, actually one of our
15 commenters did mention that they have a greenhouse production
16 that they certify that is using it when it is available.

17 And so going on in the Crops Subcommittee, we have
18 talked about, we have somebody with some experience. I say
19 that it really does make a big difference in the yield. And so
20 it does -- it definitely is used or probably would be used if
21 listed.

22 Through the written comments, we've received eight
23 written comments, four were in favor and four were against
24 listing this material. Commenters in support of the petition
25 noted that greenhouse producers would greatly benefit from the

1 addition of CO2. And it may help other producers transition.

2 We received no oral comments in opposition and two in
3 support with not a lot of detail in questions answering. We
4 did -- when I did question one commenter said that they
5 probably could get comments over, maybe in the fall from
6 producers actually, if we were to kick this, but currently we
7 don't have any testimony from any producers right now.

8 KCS, like I said, certifies one greenhouse and
9 they're using non-synthetic when it's available, but that
10 certifier's also had multiple other greenhouses request the use
11 of CO2, which they are not able to use or they're not sourcing
12 the non-synthetic because it's not on their materials list.

13 And with that being said, I want to open it up to the
14 Board for questions and discussions.

15 CHAIR SMITH: I'm realizing that we didn't plan this
16 part, Logan, do you want me -- I should probably manage the
17 question queue because you can't see anybody.

18 Okay, I will manage the question queue.

19 Go ahead, Nate.

20 BOARD MEMBER POWELL-PALM: My question is kind of for
21 Jerry. So if Jerry's going to talk, I'll wait.

22 BOARD MEMBER D'AMORE: Yeah, we've had good
23 discussions on this and it's morphed a bit. There's a -- when
24 you say greenhouses, you are confronting a longstanding issue
25 of how do they fit into any of all of this and which is -- it's

1 not to be, it's not important for this conversation in my mind.

2 As a greenhouse grower of 25 years, my farm, my
3 operation, my cost, the benefit of CO2 was measurable in double
4 digits. I don't want to go on record for what it was because
5 that could be challenged, but I'll stick with double digits on
6 a calendar year. Most of the benefit was accrued in the winter
7 time when the house was buttoned up tight. But had I, this was
8 long enough ago where the organic seal wasn't even available,
9 but what occurred is what occurred.

10 Thank you.

11 CHAIR SMITH: Nate, follow up?

12 BOARD MEMBER POWELL-PALM: Yeah, so Jerry, when we're
13 talking about essentiality and kind of what this means to
14 greenhouse growers, you're saying it's at least 10 percent.
15 And what is that unit that we're talking about? Improvement of
16 what?

17 BOARD MEMBER D'AMORE: Yield per square foot. And
18 which for me was always just heads of lettuce, but the common
19 denominator was yields per square foot. If you want more, I'll
20 continue for one second.

21 The leaf itself was thicker. The color of the leaf
22 was also darker than what I would have achieved otherwise at
23 that time of year. So it was another measurable that didn't
24 even apply to my P&L, which was the weight of the head of
25 lettuce. So it's not even factored into the comments.

1 BOARD MEMBER POWELL-PALM: Can I have a follow up
2 question to Logan?

3 So Logan, could you summarize for us what the
4 concerns are as you've perceived them in public comments or
5 written, oral, from your research?

6 BOARD MEMBER PETREY: Sure. And so the -- I guess
7 kind of the unknown. What all could it be used for? And so,
8 you know, where all would it be used, because there wasn't any
9 use in the petition, you say it would be used in this manner
10 under that. And then for the -- for public comments, most were
11 we support the Crops Subcommittee, you know, decision. And so
12 there wasn't much detail in that as far as what would be the
13 fear.

14 Because it is a relatively benign product and it is a
15 byproduct. And we were -- honestly, the Board, you know, or
16 the subcommittee, we were kind of moving along, kind of
17 expecting to possibly, you know, vote to pass. And then when
18 you just didn't get much traction from producers coming on and,
19 you know, stating that there was a great need and then going
20 through the petition again. And it really just dials into that
21 it was needed for the water adjustment. It's lost steam.

22 BOARD MEMBER POWELL-PALM: Thank you.

23 BOARD MEMBER PETREY: I have a question for Jerry on
24 that. When you mentioned the yield growth and definitely in
25 the cold, and the reason for that being just explain to the

1 Board is because when the CO2 -- usually to fix the CO2 issues
2 or the drop in level that you would open up and vent. And
3 that's much -- that it's not good to do in a greenhouse when
4 it's really cold outside because the point of the greenhouse is
5 to hold that heat in so you can have production.

6 And so, Jerry, curious, when it was warm outside, you
7 know, did you have these issues? Did you see the yield
8 difference as much? I mean, obviously not as much, but did you
9 still use it in that time or did you just vent?

10 BOARD MEMBER D'AMORE: I vented, but let me give you
11 one statistic that'll help you evaluate the question you just
12 asked. In the dead of winter, I would have a turn on my crop
13 of 49 days. In the middle of the summer, that turn would be 19
14 days. So along that -- excuse me, along that same curve is
15 when the house would be buttoned up or not buttoned up. The
16 less solar influence, the less solar the crop was.

17 CHAIR SMITH: Nate has a question

18 SECRETARY LEWIS: Actually, I have more of a comment
19 about this substance, for me, I focus squarely on the necessity
20 component of the national list requirements. And I think we're
21 talking about the issue that informs for me, you know, why I
22 voted no in the subcommittee to add this national list was just
23 around necessity and that it appears as though growers are
24 making the choice to use controlled atmosphere production.

25 And along with that comes some challenges. And so

1 this seems like a solution to a challenge that can be
2 accomplished simply by venting. It's not like there's a
3 scarcity of carbon dioxide. In fact, there's plenty and
4 actually too much carbon dioxide all around us. And I
5 acknowledge that that has impacts on temperature and production
6 and all that. But there's plenty of carbon dioxide around
7 these greenhouses.

8 And so their production choices for me weren't a
9 compelling enough reason to justify the necessity of the
10 substance in an organic production system.

11 BOARD MEMBER D'AMORE: May I?

12 CHAIR SMITH: Go ahead, Jerry.

13 BOARD MEMBER D'AMORE: Thanks. I don't -- well,
14 first of all, the single biggest cost to growing in a
15 greenhouse, to my experience, anywhere in the world just about,
16 is heating the greenhouse.

17 And if your choice is to open up the vents and turn
18 on the fans in December, what you have done to your P&L,
19 regardless of the growing system being used, is dramatic now.
20 And you and I have already had the conversation on the term
21 CEA, Controlled Environment Agriculture. That term says
22 nothing to how you're growing it.

23 It's a greenhouse. So -- but I couldn't -- I can't
24 go much further because I was using hydroponic systems, which
25 then I would have to accept your argument. So it's kind of a

1 funny thing that we're in, but the idea, I think it's the
2 growing system has not even been addressed.

3 I think the greenhouse has been addressed and there's
4 -- I don't think there's much debate about whether or not
5 you're allowed to have organic production from a greenhouse if
6 you adhere to systems that are approved. I would have a
7 greater argument with this about that subject, but I would just
8 leave it there.

9 CHAIR SMITH: Franklin.

10 BOARD MEMBER QUARCOO: Yeah. Given the fact that CO2
11 is one of the most important greenhouse gases, if we are
12 harvesting as a by-product and using it in a greenhouse,
13 because the science is clear, what CO2 does to production is
14 clear. But if folks are going to produce CO2 just so they
15 could do this, that would be a little bit of a problem
16 considering the fact that even in the greenhouse, just 60
17 percent of it is good. It still was 40 percent out.

18 So this is already a major greenhouse gas. So yes,
19 it's important for growing the crop, but what's going to be --
20 are people going to go into trying to make CO2 just for this is
21 my question.

22 BOARD MEMBER D'AMORE: If I may again, it's all
23 interesting and it's dawning on me that we're no longer in
24 subcommittee here and I'm thinking, why are people saying that
25 again? Well, because we're not in subcommittee, we're in a

1 full Board now. My rejoinder to you, Franklin, is that banned
2 or not -- let me back up, the incident of CO2 was a by-product
3 of heating the greenhouse.

4 And my option became, vent that to the outside or
5 vent it to the greenhouse. But again, I don't know that this
6 is a conversation that's highly relevant to this use. For me,
7 it was at a time where none of these questions came up. I
8 needed to heat the greenhouse. I had a decision to make.
9 Those of you who know me know that I'm not the scientist, the
10 biologist, the chemist, but reading, I knew that CO2, as we've
11 discussed a number of times, is important.

12 So I decided to vent into the greenhouse. So the
13 only question I'll answer definitively is that the effects were
14 dramatic.

15 BOARD MEMBER PETREY: So Franklin, on that, just to
16 say, there's no CO2 that's going to be produced for this use.
17 It would all be used as by-product. So it's not adding to the
18 CO2 issue.

19 BOARD MEMBER QUARCOO: Okay.

20 CHAIR SMITH: Go ahead, Brian.

21 BOARD MEMBER CALDWELL: Thanks, Kyla. Thanks, Logan.
22 Thanks, Jerry.

23 I'm very conflicted about this. I really appreciate
24 Nate Lewis's point about essentiality and the fact that
25 basically our canvassing of stakeholders was split four to

1 four. I'm wondering if this needs another look and an attempt
2 to get more greenhouse growers themselves to respond to the
3 question.

4 So my sort of gut tendency now would be to send it
5 back to the committee for another round, but I don't know how
6 everybody else feels about that.

7 BOARD MEMBER POWELL-PALM: I support that.

8 CHAIR SMITH: Go ahead, Jerry.

9 BOARD MEMBER D'AMORE: Again, it's a bit of an
10 awkward position to be a champion. So let me not be a champion
11 of CO2 in greenhouses because I'll save my powder for something
12 else.

13 But the testimonial we just heard also from Logan
14 makes me ask the question out loud to this entire Board, is why
15 not? By-product, helpful, no additional harm to the
16 environment. So again, I would just ask that one time. Why
17 not?

18 BOARD MEMBER PETREY: You can just add to the list
19 with that. With that being it, it's because I've asked that
20 same question and it's like, I'm just continuously, are we just
21 continuously adding materials? But if it is a good toolbox for
22 that, then that is understandable.

23 And so I agree with Brian, I think because the
24 commoners were split and also because hoping to get more
25 producers on the greenhouses that do need this product or that

1 would make a big difference. I would support that move.

2 BOARD MEMBER POWELL-PALM: Kyla, could I motion to
3 send it back?

4 CHAIR SMITH: No, not yet. I got Mindee and then
5 Carolyn.

6 BOARD MEMBER JEFFERY: I'm not convinced of necessity
7 and I'm concerned about the container thing. And I think if we
8 voted on this and we passed it, I'm not sure we made a good
9 case for it. And so I think if we are confused and
10 uncomfortable, we go back to subcommittee in the interest of
11 being good to our petitioners and our farmers.

12 And so for me, I'm uncomfortable. I couldn't say
13 yes. And I think process-wise, I would be uncomfortable if we
14 said yes. So I'm super happy for Nate to --

15 CHAIR SMITH: Go ahead, Carolyn.

16 BOARD MEMBER DIMITRI: I'm not saying send it back to
17 subcommittee or don't send it back to subcommittee, but I do
18 think it's telling that not enough farmers answered. And so I
19 think that that also is an answer that they didn't think it was
20 worth responding to your call for questions.

21 CHAIR SMITH: Amy, I saw your hand go up and then
22 down. Do you have a question?

23 VICE CHAIR BRUCH: Yeah. I really appreciate Logan's
24 work on this. There hasn't been a lot of information on this
25 particular aspect of the listing, which this -- as Logan

1 mentioned, this substance has been around for quite a while.
2 We reviewed one part a couple of years ago, and here we are
3 evaluating the other.

4 And like Carolyn mentioned, there just hasn't been a
5 lot of expressed need for this, and even without reach to the
6 initial petitioner, there wasn't a strong case for use in this
7 specific way in which we're deliberating to be listed, it was
8 kind of an afterthought.

9 Logan, can you repeat again what you heard from the
10 petitioner for the reason for the secondary request for the
11 listing?

12 BOARD MEMBER PETREY: And because of its use in
13 irrigation water or sprayed on leaves to adjust the water pH,
14 the assumption was we needed to be listed there as well to
15 protect it, because it would be, eventually get in the soil
16 through the irrigation water. Through a drill pond, you know,
17 doesn't it?

18 VICE CHAIR BRUCH: Yeah, I mean, we spent a lot of
19 time trying to find data points on the need for this and found
20 very few. And so that was originally my take is essentiality,
21 the necessity of the substance. It just didn't seem like we
22 heard enough information there.

23 CHAIR SMITH: I have Allison and then Jerry and then
24 Nate.

25 BOARD MEMBER JOHNSON: I've shared the Franklin's

1 concern about new CO2 and appreciate the answer, Logan, that to
2 me answers some of the comments that we got about this being a
3 fossil fuel based material or making the climate problem worse.
4 But I do have a hard time making a decision on this without
5 doing it in the context of container standards. It just feels
6 kind of out on its own. So I think taking a little bit more
7 time to look at it and in hopes that maybe we start to move on
8 container standards too would be really helpful.

9 BOARD MEMBER PETREY: Yeah. If we voted down here,
10 would that jeopardize and for container standards, I'm sorry,
11 would that --

12 CHAIR SMITH: No, go ahead, Logan. You finish your
13 thought.

14 BOARD MEMBER PETREY: So if we voted down -- if we
15 were to vote it down and then we were to work on container
16 standards in the future, would that jeopardize this being used
17 in that or is it can't be petitioned again?

18 CHAIR SMITH: Yeah, unless there was new information
19 in the re-petition, then it would not be allowed.

20 BOARD MEMBER D'AMORE: So Logan, I need a refresher.
21 The petitioner is the container grower?

22 BOARD MEMBER PETREY: The petitioner is the
23 manufacturer of the CO2.

24 BOARD MEMBER D'AMORE: I'm sorry? Okay.

25 So I'm going to ask -- I'm going to say to the team

1 here that out of solidarity and having already asked the
2 question, you know, why not, I'm going to say, why not take it
3 back? But I will vote, not no, I will abstain and because I
4 think that we are blending two things that are not -- that
5 should not be blended. So thank you.

6 CHAIR SMITH: Nate, I think you're next.

7 BOARD MEMBER POWELL-PALM: Thank you.

8 A group that we didn't hear from, but we also kind of
9 never hear from, are not container growers, but they're
10 transplant growers. And I think that's a whole different
11 bucket of just consideration that transplant industry are how
12 are we serving them? How do we get them to show up? I think
13 there's a big outreach question. Is it Carolyn's point of, is
14 it telling that we didn't hear from them?

15 I don't think we've ever really heard from that
16 group. And I have like four or five operations across the
17 country that I have in mind that have no, I don't know if they
18 even know about the process. So I'd be curious to see how much
19 outreach we could do to really just decide from those folks who
20 might need it or have the most stake over the next six months.

21 If they say no, then we've got our answer, but it
22 seems like we have a little more work to do to just find that
23 data.

24 CHAIR SMITH: I have a comment. So one of the public
25 commenters did address, Allison, your concern. And again,

1 whether or not this is good precedent or not, but there's stuff
2 that we put on the national list all the time before we have
3 standards for them.

4 So again, we just talked about one earlier today
5 about Fibromyte. So again, whether or not that's good
6 precedent, it's debatable.

7 The other thing, I'm feeling conflicted about this
8 material. I can hear both sides of the argument. I am
9 reflecting here that CO2 is allowed in process products. It
10 also is in the air we breathe. And yet we're concerned about
11 allowing it for crop production.

12 So anyway, I'm just, and I'm fine to take it back to
13 having a little bit more conversation on it, if that makes us
14 feel more comfortable. I see Franklin.

15 BOARD MEMBER QUARCOO: My main question was if there
16 was going to be new production in order to -- so is there going
17 to be something somewhere in annotations so that you cannot go
18 into CO2 production specifically for this purpose. I'm just
19 saying, there's nothing wrong with using what we have to solve
20 a problem that we have, but there's something wrong in creating
21 more of it where that's a greenhouse gas.

22 CHAIR SMITH: Yeah, I would just say that from my
23 understanding as it was petitioned, it wasn't petitioned with
24 any particular annotation. However, that is something that
25 could be discussed in subcommittee to restrict where it comes

1 from and/or where it's used. Nate?

2 BOARD MEMBER POWELL-PALM: I would like to make a
3 motion to send it back to subcommittee.

4 CHAIR SMITH: I have a motion from Nate and a second
5 from Brian. So the motion is to send it back to subcommittee.
6 Just a reminder that this is a simple majority vote and we will
7 start, are you ready, Mr. Secretary?

8 We'll start the vote with Nate Powell-Palm.

9 BOARD MEMBER POWELL-PALM: Yes, send it back.

10 BOARD MEMBER NANDWANI: Yes.

11 BOARD MEMBER QUARCOO: Yes.

12 SECRETARY LEWIS: Yes.

13 BOARD MEMBER D'AMORE: Abstain.

14 BOARD MEMBER DIMITRI: Yes.

15 BOARD MEMBER TURNER: Yes.

16 BOARD MEMBER JEFFERY: Yes.

17 BOARD MEMBER JOHNSON: Yes.

18 BOARD MEMBER CALDWELL: Yes.

19 CHAIR SMITH: Logan. Sorry, we didn't hear your
20 vote, Logan, I'm sorry.

21 BOARD MEMBER PETREY: Yes.

22 CHAIR SMITH: Amy.

23 VICE CHAIR BRUCH: Yes.

24 CHAIR SMITH: Kim.

25 BOARD MEMBER HUSEMAN: Yes.

1 CHAIR SMITH: The chair votes yes.

2 SECRETARY LEWIS: That is 13 yes, one absent, one
3 abstained. The motion carries to send it back to subcommittee.

4 CHAIR SMITH: Logan, back to you.

5 BOARD MEMBER PETREY: Thank you. Okay, moving on to
6 something easier. Going to the sunsets. Wood, can you start
7 us off with hydrogen peroxide?

8 BOARD MEMBER TURNER: Happy to. We've got hydrogen
9 peroxide at 601(a)(4) and 601(i)(5) as an algaecide
10 disinfectant and sanitizer, including irrigation systems,
11 cleaning systems, and as a plant disease control.

12 And I'm going to just keep this very simple and draft
13 off of a far smarter person than me. Franklin did a great job
14 on this this morning in livestock. And you all heard him
15 present on hydrogen peroxide it's a pretty straightforward.

16 We've heard from, we get consistently across, over
17 time, this material and this use, these uses has gotten support
18 from the community. And that's no different this time. We're
19 hearing from a wide range of the community that this is
20 something that's important and that appears in many OSPs and
21 there's general support across the community.

22 The notion that it's a safe, useful sanitizer is an
23 important consideration as well. We continue to talk about the
24 sanitizer toolkit, no pathway to understand how we're thinking
25 about that broadly, but I will continue to say that probably

1 until I leave the Board. I -- this is not a controversial
2 material.

3 Welcome any comments.

4 CHAIR SMITH: Any questions for Wood? I don't see
5 any. Logan, next up.

6 BOARD MEMBER PETREY: Amy, can you lay us off with
7 soaps and ammonium, please?

8 VICE CHAIR BRUCH: Sure, ammonium soaps have been
9 approved by the NOP for various crop uses. There's actually
10 four different uses for ammonium soaps as synthetic substances
11 to act as albicides, demonstrators, herbicides, insecticides,
12 and animal repellents. And that's the one we are going to
13 focus in on today.

14 And ammonium soaps are used as animal repellents to
15 protect organically produced crops from unwanted browsing,
16 primarily from deer and rabbits. International acceptance,
17 Canada -- the Canadian standard does allow for ammonium soaps
18 for use as large animal repellents. The other standards don't
19 list ammonium soaps or do not allow for this particular use of
20 ammonium soaps as a repellent but as a disinfectant.

21 The EPA has given ammonium soaps the lowest possible
22 toxicity classification. And if it is to cause a problem, it's
23 primarily irritation-based. And the environment studies
24 conducted by EPA estimate that ammonium soaps will undergo
25 rapid environmental degradation, yielding an environmental

1 half-life of less than one day, so pretty quick.

2 The one thing to highlight, though, is ammonium soaps
3 have been classified as highly toxic to crustaceans by the EPA.
4 In the discussion, we talked about there are other means of
5 pest prevention outside of soaps, including population control,
6 alteration of habitat, physical barriers with dispensing.
7 Primarily, there are also natural substances out there as well,
8 such as coyote urine, human hair, and black pepper oil.

9 We did ask the community a question if there is still
10 a need for soaps for this function, ammonium soaps for this
11 function, and there were 10 yeses. And the growers reported
12 that they do use this substance in tandem with physical and
13 mechanical controls, so multiple tools to solve a problem
14 there. One additional comment from a certifier said just over
15 the last few years, the listing on OSPs has gone up
16 considerably, so there's more people listing ammonium soaps on
17 their OSP.

18 There was one comment against it, this go-round, the
19 last go-round, there was no comments against it, but one
20 comment this time stated concerns with the drift impact,
21 because this isn't supposed to come in contact with soil. And
22 there were a couple groups taking non-positions, but overall,
23 this is a pretty non-controversial substance, and the farmers
24 did express the need to maintain this on the list.

25 Questions for Amy?

1 BOARD MEMBER PETREY: I don't see any, Amy. Next up,
2 Logan. Thank you, Brian.

3 Can you take us to horticultural oils, please?

4 BOARD MEMBER CALDWELL: Yeah, thanks, Logan.
5 Horticultural oils are listed in two places, at 205.601,
6 basically as an insecticide and miticide, and as a disease
7 control product. And horticultural oils are also called
8 mineral oils, or summer oils, or narrow range oils.

9 They are petroleum distillates, highly refined,
10 clearly synthetic, and of low toxicity to terrestrial
11 organisms, but they are toxic to aquatic organisms. And
12 they're really commonly used by organic vegetable and fruit
13 growers for insect mite and disease control. The EPA has made
14 the horticultural oils class them as exempt from residue
15 tolerance, meaning that they really think they're of very low
16 toxicity concern. And I think all the data really supports
17 that.

18 And the only issue that I see is that there are oils
19 that can perform a similar function that are derived from
20 vegetables, like soy oil, canola oil, corn oil, or neem oil,
21 that are available and in use. And that would be sort of a
22 natural alternative to a synthetic petroleum distillate.

23 However, we asked basically whether there were
24 alternatives from stakeholders. And basically, the responses
25 that we got said that they were either more phytotoxic or not

1 effective, the other forms. And I would point out that
2 probably, almost undoubtedly, the plant-derived materials are
3 probably more quickly biodegradable than the mineral oils.

4 But anyways, I think where we're at here is we have
5 this in our research priorities that we are looking for more
6 research trials where organic-approved materials are compared.
7 And this would be a good one, a good group to work with to try
8 to ferret out which of these plant-derived oils, or even fish
9 oils, might be useful for some of these purposes. So with that
10 in mind, that we need more research, I think we can go ahead
11 and I can say that the products are allowed by Canada, the EEC,
12 Codex, IFOAM, Japan, worldwide.

13 These horticulture oils are really probably one of
14 the most common pest control products that are used by organic
15 farmers. And to summarize the written comments, 15 were in
16 favor of relisting. One said that they should be delisted and
17 I'm talking for both uses really. The comments were similar
18 for both uses.

19 One said they should be delisted unless an annotation
20 was provided that they would be for only essential uses and
21 with concerns about worker safety. And so it's very strongly
22 in favor of relisting.

23 One grower actually responded that they weren't
24 necessary, which really surprised me. But, you know, there are
25 always outliers. So that -- and there were hundreds and

1 hundreds of users that the certifiers listed in their -- where
2 they count how many people are using these products.

3 So that kind of gives the overall view of
4 horticultural oils. Very strong support within the producer
5 community to keep them on. And my own very small, you know,
6 minor caveat as well, maybe we should be also investigating
7 some of the plant-derived similar materials to see if they're
8 effective and safe on the plants and the people.

9 So, ready for questions.

10 CHAIR SMITH: Questions for Brian. I don't see any.
11 Back to you, Logan.

12 BOARD MEMBER PETREY: Great, okay.

13 Franklin, will you -- let's see, where are we on
14 pheromones, please?

15 BOARD MEMBER QUARCOO: All right. So, pheromones.
16 So pheromones, they are synthetic substances. They are listed
17 as 205.601. Synthetic substances allowed in crop production
18 for insect pest management. They are basically volatile
19 chemicals that organisms, especially insects, use to
20 communicate between themselves.

21 And all kinds of communication, they communicate
22 danger, they communicate finding mating partners, they
23 communicate where to find food, where to relocate their
24 colonies. So they communicate in various ways using
25 pheromones. So pest management, we just exploit this

1 understanding of how they communicate to manage them through
2 behavioral manipulation.

3 So, different ways of doing that. Sometimes it's a
4 passive trap. So we have the pheromone somewhere and then the
5 insect is drawn to it. So even if it has a kill strip or a
6 pesticide in there, it doesn't get out of the passive trap. So
7 it just volatilizes. Then there are other methods where it's
8 an active movement involving spraying, using all kinds of
9 stuff.

10 So those are some of the differences between how it
11 is deployed. How is it synthesized? It's just a reaction
12 between an acid and then an alcohol, whether it's a straight
13 chain alcohol or one with a benzene ring. It's that kind of
14 reaction. It's an ester. And international acceptance, it is
15 allowed in -- all sources are allowed for pest control in
16 Canada, whether it's pheromone traps or passive dispensers in
17 Canada.

18 It's allowed in the European Union. CODEX allows it.
19 Allowed in traps and dispensers only in IFOAM. Allowed in just
20 for organic production in Japan. So there are different ways.
21 Like I said, there's passive, there's active, there are all
22 kind of retrievable polymeric dispensers. There are various
23 ways it's dispensable. I don't want to go into that.

24 There are a few health issues, health and
25 environmental issues: asthma, cancer. But the fact is, you

1 don't get in contact with the material because the dispenser
2 keeps that material from coming into contact with folks. So
3 those are the things.

4 There are various ways it's deployed, but like I
5 said, and based on the discussions, there's widespread use and
6 all the comments we've received are in support of releasing
7 pheromones. The one thing I want to say, give me a second. It
8 is important to know that when the regulations allow the use of
9 LIS-3, they do not allow the use of LIS-3, which is inerts with
10 unknown toxicity with active dispensers.

11 So inerts that are -- because normally this thing is
12 formulated together with some inerts so that some type of slow
13 release materials and stuff. But if you are going to use an
14 active trap where actually active pheromone, where the
15 pheromone is actually moving and being sprayed, you cannot use
16 an inert that is LIS-3 in it. That's about all I have.

17 Any questions?

18 CHAIR SMITH: I don't, oh, wait, one from Wood.

19 BOARD MEMBER TURNER: Did you say anything about
20 public comment? Did you summarize? Did I miss that, Franklin?

21 BOARD MEMBER QUARCOO: Sir?

22 BOARD MEMBER TURNER: The public comment, did you say
23 anything about it?

24 BOARD MEMBER QUARCOO: Yes, so I said the general
25 comments have been to accept it, I didn't see any.

1 BOARD MEMBER TURNER: That's what I thought, yeah.

2 CHAIR SMITH: Okay. I don't see any other questions
3 or comments back to you, Logan.

4 BOARD MEMBER PETREY: Back to Brian with ferric
5 phosphate.

6 BOARD MEMBER CALDWELL: All right, thanks, Logan.
7 Ferric phosphate is a commonly used material. It is for
8 controlling slugs and snails. It is spread on the soil surface
9 for this. And the active ingredient, ferric phosphate, iron
10 phosphate, is quite benign, has low toxicity, and is quite
11 ubiquitous. Again, the iron ions and the phosphate ions are
12 very ubiquitous in nature.

13 However, in these products, only about 1 percent --
14 well, in the products that are available in the U.S., 1 percent
15 of the product is the active ingredient, 99 percent are inerts.
16 And once again, the whole inert issue comes up. And in this
17 case, it comes up more strongly even than usual, because in the
18 past, when this material has been reviewed, there have been
19 concerns that EDTA, which you might remember as a chelating
20 agent that came up before in one of the livestock products that
21 I reviewed, as not being allowed in Canada with that particular
22 product.

23 But EDTA -- there's evidence from research that when
24 iron phosphate and EDTA are combined, it basically increases
25 the toxicity to earthworms by a factor of about 100. So it's

1 way, way more toxic to earthworms, and they are a proxy for
2 slow organisms with this chelating agent. And the other part
3 of the inerts are like these, you kind of spread these granules
4 out and they're kind of like little pieces of candy.

5 And the sugar and that kind of thing attracts the
6 slugs, which then are going to ingest the active ingredient and
7 that chelating agent. We have a TR that's pending, which tries
8 to see if there's more new research on this, because it was
9 controversial in the last couple of reviews. It's pending, we
10 haven't gotten that yet.

11 The manufacturer claims that ferric phosphate is
12 effective without the chelating agent. So a potential
13 direction that we could go would be to renew this, to relist
14 this material, and then -- with an annotation, if we find that
15 the new TR says that the chelating agent plus the active
16 ingredient is much more toxic like that, we could have an
17 annotation saying, okay, well, if it's effective without the
18 chelating agent, let's not allow the chelating agent.

19 So that might be a direction we can go forward. It's
20 allowed in Canada, the EC codex, IFOAM in Japan. Worldwide,
21 the manufacturer's in Germany. In terms of written comments,
22 there are hundreds of users listed by the certifiers and 11
23 comments in favor of relisting and one in favor of delisting.

24 CHAIR SMITH: Questions for Brian? I see one from
25 Amy. Go ahead, Amy.

1 VICE CHAIR BRUCH: Brian, I really appreciate your
2 thoroughness in diving down into the issues that matter here.
3 You mentioned about the manufacturer didn't necessarily say
4 that the chelating agent wasn't important for the
5 effectiveness. Is that correct?

6 BOARD MEMBER CALDWELL: Right.

7 VICE CHAIR BRUCH: What about for the manufacturing
8 process? Is it necessary? Or as you said, if you just made an
9 annotation, they don't necessarily need it. What's the reason
10 for it in the first place? Do you know?

11 BOARD MEMBER CALDWELL: That's a really great
12 question, Amy. I looked through a lot of the petitioning
13 materials and what happened was when the safety basically for
14 soil organisms came up in the last review, the manufacturer did
15 send another batch of documents. I didn't see anything in
16 there saying that using the chelating agent was essential in
17 the manufacturing process. I didn't see that, but that's a
18 question. And maybe they will answer that.

19 The other reason for a chelating agent like that
20 would be just to, I would assume, hold the iron and phosphorus
21 in those states through rain events and that kind of thing,
22 just to kind of keep them in ionized form and then so they're
23 still available to the slugs and snails.

24 But I don't know that that's exactly the reason. So
25 it's a great question.

1 CHAIR SMITH: I don't see any other questions. Back
2 to you, Logan.

3 BOARD MEMBER PETREY: Great, thank you, Brian. Thank
4 you, Amy, for that.

5 Next we have Jerry with potassium bicarbonate.

6 BOARD MEMBER D'AMORE: All right, I want to talk
7 about hydroponic systems if you don't mind.

8 Good afternoon, I've got potassium bicarbonate. It's
9 205.601(i) as a plant disease control. This substance is
10 informed by a 1999-TAP and a 2015-TR. The '99 TAP review
11 concluded with, "the data available on this material points to
12 its being safe and benign to the environment when used at the
13 recommended concentrations."

14 Further, there were two references to human health
15 found on page two, no carcinogenicity, no effects of
16 overexposure were documented. The technical report that came
17 in 2015 was, in fact, a limited scope TR focused primarily on
18 essentiality and availability. It did also give strong support
19 regarding potassium bicarbonate's effectiveness for disease
20 control.

21 So in essence, what we have is a 24-year-old TAP
22 serving as the foundational document for a nine-year-old
23 limited scope TR. But to be fair, both the TAP and the TR were
24 nicely done. And I would also say, given the Board's increased
25 and current view of our TR process, that it would be a safe bet

1 the potassium bicarbonate will have a full TR review during the
2 next cycle, would be my bet.

3 To the international side, it's fully on Board with
4 our international partners. Canada allowed, European Union
5 allowed for production and conservation of organic grape vines.
6 So anyway, allowed right through Codex, International
7 Federation, IFOAM, and Japan.

8 During the 2015 review process, stakeholders were
9 questioned regarding alternatives to potassium bicarbonate.
10 The organic producers responded that while alternatives were
11 indeed available, and it responded that while they were
12 available, that with their practices, potassium bicarbonate
13 remains essential for their specific production practices.

14 For the current period, fast-forwarding to our past,
15 just recently completed comment period, there were about 22
16 written oral comments, the vast majority of which were strongly
17 in favor of relisting, with one questioning the classification
18 and one responder stating no comment.

19 In review, it appears as though potassium bicarbonate
20 is heads and shoulders above alternatives, particularly in
21 pottery mildew prevention. Thank you.

22 CHAIR SMITH: Questions for Jerry? I don't see any.
23 Back to you, Logan.

24 BOARD MEMBER PETREY: Thanks, Jerry. If you need an
25 event planner, let me know. I'm just kidding. I couldn't help

1 with the greenhouse carbon dioxide deal. Okay. Frankling with
2 magnesium sulfate.

3 BOARD MEMBER QUARCOO: All right. Magnesium sulfate,
4 listed as 205.601(j). Synthetic substances allowed for use in
5 crop production as a plan of soil amendment. The last year was
6 in 2011. It has a variety of uses, but we are focusing on its
7 use as a plant and soil amendment. It has a natural
8 occurrence, and we have a synthetic version of it.

9 The things it does, it helps seeds to germinate. It
10 increases the production of chlorophyll and aids in the
11 production of flowers. It's a good product for plant growth.

12 It can be obtained naturally from natural sources.
13 We have what we call the epsomite and the kieserite, which they
14 are hydrated forms. One has one molecule of water, and the
15 other has seven, but those are the natural forms that we have.

16 International acceptance in Canada is allowed when
17 soil and plant deficiencies are documented. By visual symptoms
18 of testing the soil or the plant tissue, it has to be
19 documented.

20 European economic community, it has to be of natural
21 origin for it to be allowed. CODEX is allowed for use in soil
22 fertilizing and conditioning. IFOAM is allowed regardless of
23 soil deficiency documentation. Japan is allowed regardless of
24 soil deficiency documentation. There are a number of human
25 health issues that are listed. The quantities in which

1 magnesium sulfate is used in agricultural systems is not likely
2 to cause those things to happen.

3 What else? Well, the fact that it exists in the
4 atmosphere in a particulate state makes it less likely for it
5 to be released and go to places that it's not. It is also not
6 held strongly to river sediments. So this is not something
7 that is going to persist and cause a lot of problems.

8 The discussion in 2019, the NOSB review, the public
9 comment expressed continuous support for the material. It was
10 said to be very important for high tunnels and greenhouse
11 production and fruit tree production.

12 Some folks also said that dolomite, which is a
13 natural version, is not a suitable substitute in all cases as
14 it cannot be used when the soil pH is high. So magnesium
15 sulfate allows you to add sulfur without increasing the pH. So
16 that's one of the things.

17 One commenter also noted that the use of magnesium
18 sulfate should not take the place of soil building practices.
19 Current comments are in support of releasing this material.
20 That's about all I have.

21 CHAIR SMITH: I see a question from Jerry.

22 BOARD MEMBER D'AMORE: Franklin, did you get any
23 direct responses from the question of practices or methods?
24 Anything new on the horizon asked of the stakeholders?

25 BOARD MEMBER QUARCOO: No.

1 BOARD MEMBER D'AMORE: No? Okay. Thanks.

2 CHAIR SMITH: I have a question from Brian.

3 BOARD MEMBER CALDWELL: Thanks, Franklin. I reviewed
4 magnesium sulfate as a livestock material. I'm just wondering
5 if we -- as we move forward, maybe we should both ask in our
6 write-ups for the fall meeting whether there are natural
7 sources of this that could be used for these purposes or
8 whether there's commercial availability of naturally derived
9 magnesium sulfate.

10 BOARD MEMBER QUARCOO: Yeah. Like the dolomite that
11 I mentioned is a natural source. The problem with that is that
12 it's going to raise the soil pH.

13 If the pH is already high, that's going to be your
14 source of whether it's calcium or magnesium because dolomite
15 has a combination of the calcium, magnesium, carbonate complex.
16 And so that's going to be a problem if your pH is already high
17 and that's going to be your source of either calcium or
18 magnesium.

19 CHAIR SMITH: I see Amy and then Allison.

20 VICE CHAIR BRUCH: Franklin, thanks for your review
21 here. I really appreciate it. I was just going to echo the
22 importance of this substance for farmers to have this in their
23 toolbox.

24 You mentioned that it's important in chlorophyll. I
25 was going to say it does help for nitrogen utilization. So

1 when we look to be more efficient with our soils, we need them
2 balanced so we don't need to put on as much fertility such as
3 manure, compost, et cetera.

4 So magnesium is a core component. When you do have
5 too much magnesium in your soil, it makes for tight pores and
6 it sticks to your boots. So you can know if you have too high
7 of magnesium.

8 In Logan's area, you definitely don't have enough
9 magnesium in your soils or that's what we learned when we
10 farmed in Florida. A lot of calcium, not as much magnesium.
11 But just to plug that this is an important element. If we
12 could find natural sources, that's really critical. But just
13 in general, farmers need to have this. Thank you.

14 CHAIR SMITH: Allison, please go ahead.

15 BOARD MEMBER JOHNSON: I'm glad you brought up the
16 cross between livestock in here because we also have this on
17 handling tomorrow as a non-synthetic allowed. So there is some
18 interesting crossover and we should maybe talk about that a
19 little bit more tomorrow.

20 But, yeah, we should line them all up in some way.

21 CHAIR SMITH: Okay. I think we can go to the next
22 one, Logan.

23 BOARD MEMBER PETREY: Great. And just to mention on
24 what Amy was saying, we also are low on the sulfur too. So,
25 yeah, important part. Okay.

1 Next, Amy. It's actually yours with hydrogen
2 chloride.

3 VICE CHAIR BRUCH: All right. Thank you, Logan. One
4 second. Pull up my notes. All right. And we did request, and
5 I believe it should be posted, a limited scope TR for this
6 substance. And that was mainly looking at alternatives for
7 hydrogen chloride and alternatives actually for cottonseed de-
8 linting because that is the use for hydrogen chloride is to de-
9 lint cottonseed, which is essential for mechanical planting.

10 When we look internationally, and I wanted to say
11 thank you to Heather. This was something that she worked on a
12 lot for several substances, but just the international
13 acceptance criteria, she reviewed the different standards out
14 there, and particularly for this substance, international
15 acceptance, this substance is not explicitly mentioned in any
16 of the other standards. So I really appreciate that
17 information.

18 Heather, when we look for human health and
19 environmental issues related to hydrochloric acid, it's not
20 considered a carcinogenic substance to humans. A major HCL
21 effect is local irritation. In the environment, soil and sand
22 will absorb hydrochloric acid. These are recommended practices
23 for cleaning up hydrochloric acid spills. The discussion --
24 this was petitioned in 2002 to be added to the national list
25 and was added in 2004.

1 All the reviews have really been supportive of
2 relisting because hydrochloric acid was deemed the only
3 available solution for organic farmers needing to de-lint
4 cottonseed. A good portion of the conversation and prior
5 conversations and reviews have been looking at natural
6 alternatives. The TR provided insight into alternative
7 practices that could be used to de-lint cotton outside of
8 chemical means. And that really is circulating around
9 mechanical de-linting. They also pointed to flaming or
10 breeding fuzzless seed. But those -- fuzzless seed definitely
11 is not an option because it does involve chemical mutagenesis.

12 The USDA Cotton Research Group in Texas has
13 successfully built a commercial scale mechanical de-linter.
14 And that was a topic of conversation during the last review.
15 We didn't necessarily find too much more information out about
16 the progress of that mechanical de-linter outside of just the
17 comment that there hasn't been an industrial partner ready to
18 manufacture it.

19 And the key challenge with that is the small size of
20 the U.S. organic production market. It's just there's not an
21 economic incentive for companies to develop organic specific
22 technologies just due to the market size.

23 Going to public comments, we did ask one question
24 about recent advances in alternative practices. What we found
25 out just in general comments is that three commenters supported

1 relisting. One certifier comment mentioned that zero producers
2 are using this but should not be removed from the listing just
3 because -- let's see, shouldn't be removed from the listing
4 because it is crucial for certified organic cotton seed. There
5 was one commenter that stated about this should be added to
6 research priorities to include cotton de-linting alternatives.

7 A couple of commenters, and this includes the Farmer
8 Cooperative and Trade Group that were very instrumental in
9 petitioning for this substance 20 years ago. They mentioned
10 that they recently became aware of organic cotton farmers
11 planting seed that had been de-linted with sulfuric acid. And
12 that isn't on the national list.

13 So they dove into this further and farmers pointed to
14 a recent NOP, it was NOP 5029-1 issued in 2018 that stated, we
15 have clarified that substances used during the production of
16 non-organic seed or non-organic planting stock do not require
17 review. This includes substances that may be used in post-
18 harvest handling and cleaning of non-organic seed and planting
19 stock that do not remain on the seed when it's planted.

20 So based on the above, the understanding is that
21 since none of the cotton planting has seed that's -- none of
22 the cotton planting seed being treated with HCL is certified
23 organic, de-listing is not required.

24 So essentially we've kind of come full circle. This
25 was requested for use for organic seed, but since there is not

1 organic seed available, the original petitioner said, you know,
2 we really probably don't need this. It's not essential for
3 organic cotton production.

4 However, the listing would be critical if there was
5 organic cotton seed available. But the likelihood is pretty
6 low just because of the size of the U.S. market. Which brings
7 me to one question, and I was hoping to ask this to one of our
8 commenters, but they canceled on us.

9 I was just curious how India handles this. Most of
10 our organic cotton actually is imported from, or sorry, is
11 received from India. India is a major exporter of organic
12 cotton, and I'm just curious in India if organic cotton seed
13 existed.

14 But currently the state of the commoners think that,
15 you know, although this isn't needed currently, there's a
16 potential in the future if organic cotton seed is available,
17 maybe we should keep this on the list. So that was some new
18 developments, I think, since the last time we reviewed this,
19 since the NOP came out with that information in 2018.

20 All right, what questions do you have on this
21 substance?

22 CHAIR SMITH: Yeah, thanks, Amy. This is great.

23 I see one from Nate, and then I see Allison.

24 SECRETARY LEWIS: Yeah, just a couple more details to
25 add to the conversation.

1 I looked at this substance in 2014 when it was up for
2 sunset, I guess two cycles ago. I was in Lubbock and got the
3 opportunity to visit the ARS Research Facility that was
4 developing the mechanical de-linting.

5 At that time it was just a tabletop model, so it's
6 encouraging to hear that they're moving in the right direction.
7 I know the industry as a whole, organic or conventional,
8 doesn't want to deal with really toxic chemicals to de-lint
9 their seeds. So once that becomes commercially available, it
10 will probably be a moot point.

11 Some other details that I learned in that time in
12 Texas, working with the Texas Organic Marketing Cooperative,
13 was that one of the barriers is that the seed houses that use
14 this substance to de-lint are not certified facilities. So
15 that was really the barrier. Farmers can, in the cotton
16 industry, they call it catching their own seed.

17 So they can catch their own seed. Cotton is a
18 sulfur. You can catch seed for a few years, but then you lose
19 vigor and quality, and you kind of need to go back to some of
20 the more traditional breeding lines.

21 So the issue was that they would catch their own
22 seed, and they'd have fuzzy organic seed. They'd send it to a
23 non-certified facility to get it de-linted. And so it was that
24 lack of certification of that facility that meant that it was
25 not organic seed that was available.

1 So, you know, additional details. I was intrigued by
2 the comment by the Texas Organic Marketing Cooperative that
3 sulfuric acid is now being used as a preferred de-linter, and
4 curious about it. But I imagine it's a similar scenario, where
5 the seed is going to a non-certified facility, being de-linted,
6 and that's where you lose that potential certification of the
7 seed.

8 But like I said, you can only catch seed for a few
9 years before you need to go back to more traditional breeding
10 lines or hybrids. The other component about our trading
11 partner were other sources of cotton. This is, again, my data.
12 My facts are 10 years old, so things might have changed. But
13 in India, a lot was planted by hand by small land managers. So
14 they were planting fuzzy seed.

15 They weren't planting de-linted seed. And so, again,
16 it's back to a mechanical limitation. If you are going to
17 plant mechanically, you need it to be de-linted. So hopefully
18 those are helpful facts to enter into the conversation on this.
19 Helpful? Maybe made it more complicated? I don't know.

20 VICE CHAIR BRUCH: No, very helpful. And that's
21 correct. The sulfuric acid is used in the conventional cotton
22 seed production. So that's not on the national list either,
23 but it was something that was mentioned. And then a very
24 helpful point on the India aspect, Nate, because this is
25 necessary for the mechanical planting, as you mentioned. So

1 thanks for pointing out those two items.

2 Appreciate it. And then I think we have Allison. Is
3 that right?

4 CHAIR SMITH: Yeah.

5 BOARD MEMBER JONES: Yeah, thank you.

6 I just wanted to say I'm aware of one organic cotton
7 grower in California who is trying and trying to get to market,
8 and the post-harvest infrastructure just isn't there for
9 textiles in the U.S. anymore. So I think with increasing
10 demand for clean textiles, just like we see in food, hopefully
11 we'll start to see that infrastructure rebuild. And that's
12 another area where market development and a really concerted
13 attention to making sure that we can do the whole thing
14 domestically could be powerful.

15 But in the meantime, I think keeping us on the list
16 as one less barrier to the growth of a domestic organic cotton
17 market would be great. We have one more question from Carolyn.
18 Oh, perfect.

19 BOARD MEMBER DIMITRI: Hi, Amy. This is a totally
20 basic comment, and it shows my lack of knowledge of science.
21 But, like, I was so confused when you started talking about
22 hydrochloric acid and the substance that's called hydrogen
23 chloride.

24 So I just feel like you need to have some knowledge
25 to understand, like, the transition from one to the other,

1 which I've already Googled, so you don't need to answer it.
2 But maybe when you revise it, you can just make that more
3 clear, because I really got hung up on it. I don't know.

4 Does everyone know that? Am I the only person here
5 that really didn't know that? Wow. I'm an economist. I can't
6 help it.

7 VICE CHAIR BRUCH: No, Carolyn, thank you for
8 pointing that out, and I apologize. I did skip over kind of
9 just the use and the conversion, but hydrogen chloride is a
10 gas, which then turns to acid. So that was kind of it. It's
11 spelled out in a little bit more detail in the actual write-up.

12 But I appreciate the heads up, and I'll provide a
13 little bit more context to that in the next review. So thank
14 you.

15 BOARD MEMBER DIMITRI: Can I just say one more thing?
16 It wasn't spelled out clearly for me because I did read it to
17 try to see if you wrote it, and I didn't miss it. So just,
18 yeah, thanks.

19 BOARD MEMBER JOHNSON: Okay. Thank you. I
20 appreciate that.

21 CHAIR SMITH: Okay. Back to you, Logan.

22 BOARD MEMBER PETREY: Okay. It's actually mine.
23 Thank you, Amy. I appreciate that. And thank you, Nate, for
24 that explanation. That was neat. But most of our cottons come
25 from India, and it's hand-planted. That's a lot. That's a

1 lot. Okay.

2 Going on with ash from manure burning. So this is at
3 205.602, non-synthetics prohibited. And it's kind of got a
4 history.

5 So we had petitions to annotate in 2014 and 2019.
6 Those did not pass. 2014 was to annotate ash from manure
7 burning, except where the combustion reaction does not involve
8 the use of synthetic additives and is controlled to separate
9 and preserve nutrients, is unanimous to decline that petition.

10 And in 2021, ash from manure burning, unless derived
11 as part of the production of biochar from paralysis of cow
12 manure, would actually have that petition, and that was voted
13 down as well. So the use of ash from manure burning would be
14 used as a soil amendment to address soil remediation and
15 sequester carbon. Its manufacture can be thermally decomposed
16 through combustion and paralysis to produce ash.

17 And the idea is that, you know, in the manure, the
18 carbon is actually very important to the soil. And burning it
19 off is not necessary. We're there to feed the soil.

20 And I think Amy also mentioned in our subcommittee
21 calls that the idea that there is not enough manure or there is
22 too much manure, excuse me, there's too much manure and we need
23 to get rid of it, it's just not necessarily the case.

24 We have growers that are needing it, especially with
25 some of the supply chain issues that we've seen, and

1 conventional growers are wanting the source as well, kind of
2 figuring out if it's actually good for their crops. And so it
3 makes it more competitive.

4 And so we're just not in the need. There may be
5 certain areas that have a high production of this, like the
6 poultry area and maybe like the Maryland area might have some
7 of that, but it's widespread. There's a huge demand for this
8 raw material.

9 And so burning it off is not necessary for us. As
10 far as the human health and environmental issues, there are
11 none. But it's because of the burning off the carbon that we
12 don't find it compatible with organic systems.

13 So with that, I'll send it back for any questions.

14 CHAIR SMITH: You have a question from Wood?

15 BOARD MEMBER TURNER: I'll just say I don't regret
16 asking for the TR for the biochar petition. It's fascinating
17 reading if you're interested. So I highly encourage you to
18 read it.

19 CHAIR SMITH: I don't see anything else. Back to
20 you, Logan.

21 BOARD MEMBER PETREY: All right. Thank you. And we
22 are on our last one.

23 Mindee, can you close it up for us?

24 BOARD MEMBER JEFFERY: I can. But there is not a
25 universe wherein I can string all those vowels together, so

1 cryolite, mind, is currently listed as a non-synthetic
2 substance prohibited for use at 205.602. All the written
3 public comments received in this round supported the
4 continuation of this listing as a material prohibited.

5 Comments cited issues of public health and the
6 availability of effective alternatives. Commenters noted
7 organic growers have not reported a need for this material.

8 CHAIR SMITH: Quick. Any questions? Mindee just
9 wants to talk about compost, so.

10 Okay. Back to you, Logan.

11 BOARD MEMBER PETREY: Well, that concludes the
12 sunsets, and we are going to open it up for the compost. I
13 don't know how much time we're going to allow for this, because
14 we are, I'm looking at Eastern time. Okay.

15 So we have 15 minutes until recess, but let's just
16 talk and see from the compost panel. I'm so glad that they
17 came out and discussed. I realize, you know, some of those
18 details were -- I guess you might consider elementary, but
19 really it is an in-depth topic, and there's a lot when you're
20 talking about the biologies, when you're talking about the
21 temperatures, and why things happen, and why you have to have
22 some things decompose, and I didn't even realize there was a
23 finished compost.

24 You know, so I've learned a lot already, and I've
25 been dealing with compost for a while. So I'd like to push it

1 back to Mindee or Nate to lead this last part of the discussion
2 so that I don't ramble too much and that we get some things
3 done.

4 BOARD MEMBER JEFFERY: Thank you so much, Logan, and
5 thank you, everyone, for your attention on this and what a fun
6 subject it is and how overwhelming it can be. I'm excited
7 about it. The compost discussion started with support from
8 Nate Powell-Palm, who was the chair at the time, and with Amy,
9 who was the Crops Subcommittee chair at the time.

10 We worked toward a work agenda item, and I am real
11 grateful that Nate Lewis came on board for helping us work on
12 this issue. So great job on the compost panel, Nate. Thank
13 you for lending your voice to all the discussion and setup and
14 getting the full Board immersed into this issue.

15 Really appreciate you talking me through things so
16 many times. I'm an out loud processor. Sometimes I have to
17 really work it through to get it, so thank you.

18 The following summary, it's not really meant as a
19 full dissection of public comments. It's a massive universe
20 out there, and we wanted, in the honor of collaboration and
21 really cast a wide net, find out everything we can find out
22 from ourselves and from the experts that show up in public
23 comments. And so just know that I have every question and all
24 of the public comments cataloged into each individual question,
25 and that's all going to go back towards informing what we do in

1 crops.

2 I really want to appreciate the work of the food
3 technologists. When I find myself a little overwhelmed and I
4 sort of can't see the wall anymore and I'm confronting my
5 unconscious bias, it's really nice to read through how you
6 packaged it for us, and so I really appreciate you. In that,
7 we are committed to making a recommendation to the program
8 rather quickly because that's what this Board said we would do
9 in light of the BPI petition.

10 I think it could be really important for us to sort
11 of look at the buckets that we are really within our authority.
12 And so it looks like 205.203 definitions and the national list.
13 And so I think it would be good in the context of this
14 discussion to look at those packages, get a sense of the
15 direction because we need to give crops a direction, right, to
16 work on this.

17 And so unpackage those areas where that's the work
18 that this Board does and that we can get some clarity and knock
19 out some low-hanging fruit of some issues. So we can just look
20 at 205.203, think about the definition, think about the
21 national list and kind of establish some clarity for crops to
22 work on, and then take some time for the bigger issues for the
23 Board to inform us of where to go on some of those other
24 issues. Does that make sense?

25 So in the sense of 205.203, we added an additional

1 method in our suggestions. So if you're looking at your
2 discussion document and you look at question one. So the
3 205.203, we suggested an additional method. We had some
4 questions about the 15-day interval, and we got good comments
5 back on that, and I think we have pretty clear direction in
6 that I think we have some consistency issues and some clarity
7 that we need to do on the 15-day issue. We heard from public
8 commenters and material review folks that they liked our
9 additional -- our sort of language adjustment to those one, two
10 -- those, well, they're two, three, and four. So we're talking
11 about the static pile, the windrow, and the container methods.

12 And so we heard back that folks like that and that
13 we're on the right track with that, and we may want to consider
14 other.

15 So I'm pretty clear that the comments gave us that
16 clear direction, and so if anybody has any questions about
17 that, it might be a good moment to indicate to us as crops, if
18 you have questions there or you want to send us in another
19 direction. Working towards a recommendation, that's the
20 language we're working with there.

21 So I think we have a little bit of work to do on the
22 15-day requirement, and I think we should follow up on a little
23 bit of questions on how to language that so it's really clear
24 that what are we doing at material review and at certification
25 when we're evaluating windrow systems and how that 15-day is

1 looked at, because I think the impact to the small-scale
2 windrow producer is important there, and we've got to get that
3 right.

4 And so we're not talking about reducing the 15-day
5 requirement, we're just talking about consistency at review as
6 to whether or not that has to all happen in 15 days and no
7 longer. We good there?

8 So then the other section there is the carbon to
9 nitrogen ratio.

10 Sorry, did I miss somebody? Go ahead, Amy.

11 VICE CHAIR BRUCH: Sorry, thank you. I just had a
12 question.

13 Do we need to expand the scope on that one to
14 consider these static piles or modified static piles just
15 because of the ratio of what Doug had told us of both season
16 windrows versus other methods?

17 BOARD MEMBER JEFFERY: Yeah, my sense is if we clean
18 up our languaging on the 15-day requirement, we'll fix that.
19 So we intend to work on that in crops. Great.

20 And then the carbon to nitrogen ratio, I think we
21 heard a lot in public comments about how that is a best
22 management practice, and we might not need that at initial
23 feedstock review, and that we may want to consider if we want
24 to put guardrails around finished compost, but there's testing
25 implications there, so I think there's some discussion to be

1 done on whether or not we want to do that. So that's the
2 direction we're going to go in crops as we explore this for
3 next semester.

4 Okay. So I suggest in conjunction with CACS around
5 testing UREC and contamination that crops has a cross-dialogue
6 with CACS on that residue testing because it's a big universe
7 and there's a lot of implications, and I think we're going to
8 do a better job if we do that collectively in conjunction their
9 work over in CACS, and I think we'll hear more about that
10 tomorrow.

11 SECRETARY LEWIS: Yeah, and we will talk about that
12 more in CACS, and I think to foreshadow and help this
13 conversation, the residue testing discussion document is going
14 to first focus on residue testing of certified organic products
15 and then second potentially focus on residue testing
16 requirements, contamination, et cetera, of inputs used on
17 organic farms or inputs used in organic production. So again,
18 trying to keep each bite actually a bite and not a mouthful,
19 but I think that your inclination and your suggestion to
20 relocate that component of the compost dialogue is sound.

21 BOARD MEMBER JEFFERY: Questions on that piece?

22 Okay. So thinking about definitions in the public
23 comments, we definitely heard the suggestion from the
24 composting community that we look to the AAPFCO, which is sort
25 of reflecting current compost thinking and practice around

1 that, and I really like that suggestion. I think we do have to
2 consider our definition and how important that reference is to
3 plant and animal material and how we may want to consider a
4 reference to the national list in that we could adjust the
5 definition to say plant and animal material and allowed
6 synthetics on the national list because that gives us
7 consistency with references in other places like paper pots.

8 So work on the definition. I think we should
9 consider our definition against the suggestion from the compost
10 community and the need to reference the National List, and I
11 don't think we have to be in perfect agreement here. We're
12 looking for direction to crops to move forward.

13 Okay. Go ahead.

14 CHAIR SMITH: I saw Allison have a question on her
15 face. Not fully formed, but I think this is the right place to
16 say that if we're thinking about incorporating the ASTM
17 standards, I would lean toward doing that in our own words
18 rather than referencing the standards so that we have a little
19 bit more control in the organic world of how that evolves over
20 time, thinking of the inert situation as a cautionary tale. So
21 I like the idea potentially of incorporating some of these best
22 practices that exist but being explicit about it in our own
23 rules.

24 SECRETARY LEWIS: I think that's great, and we have
25 the flexibility because a number of the ASTM standards are

1 already incorporated by reference at 205.3, so we can lean on
2 the existing regulation should that be useful.

3 BOARD MEMBER JEFFERY: And then here we are at the
4 national list. And so for us, if we want to add synthetics to
5 the national list and make considerations there, that's where
6 we have to work through the national list, right? And so I
7 guess I'm interested in hearing that we affirm that that's our
8 process and then hearing folks around what they might think of
9 as a synthetic we might think about adding in those. Like, do
10 we need classes? I'm a little, like, I'm a wonky there, Nate.
11 Like, get in here and help me with that part.

12 SECRETARY LEWIS: Yeah, well, I think that the
13 national list process is cumbersome and it is specific and it
14 is relatively inflexible. So those are some challenges to the
15 national list process, right? And so we just want to proceed
16 cautiously.

17 But based on precedent around paper being used as a
18 compost feedstock with leaf collection bags, that is our tool.
19 So let's exercise that tool and recognize that it's a hammer
20 looking for a nail, right?

21 BOARD MEMBER JEFFERY: Well, yeah, because we have
22 this broad work agenda, right, from the program around compost.
23 But we also have the work that we do here. And so in the grand
24 scheme of things, we don't have a specific request to us around
25 specific synthetic materials.

1 So where's the path?

2 SECRETARY LEWIS: Well, I think the path is that as
3 part of this compost proposal, we can make a recommendation to
4 the program to add a synthetic to the national list.

5 BOARD MEMBER JEFFERY: So is it functional, then, for
6 us to then request from this group, looking at that, what ones
7 are we considering?

8 BOARD MEMBER DIMITRI: Okay, Mindee, you are
9 formidable. I'm just telling you. So can you, like, walk back
10 about three steps and talk to someone who's, like, not a
11 compost maker and not on the crops committee and say, like,
12 what is, like, the overall purpose of this particular work
13 agenda?

14 And they're like, where do you want to take it? And
15 thank you. And I say that you're formidable in the most
16 complimentary possible way because you are, like, wow.

17 BOARD MEMBER JEFFERY: I appreciate it. I'm good at
18 process, but I get lost in the details, and that's why I need
19 Nate Lewis all the time. So go ahead, Nate.

20 SECRETARY LEWIS: Well, Carolyn, I think your
21 question could be stated, what does success look like, perhaps,
22 or what are the overarching goals of the work on the compost?
23 And I think that that was motivated by a number of factors.
24 One, that there are some specific languages, language in the
25 regulation around compost that do pose barriers to meeting the

1 organic requirements.

2 And they're -- I wouldn't want to say obsolete, but
3 they are based on a relic of a compost standard. So there is a
4 motivation to modernize the organic regulations to reflect how
5 composters are currently thinking about compost and safety and
6 product quality. There is simultaneously a broader
7 conversation around compostable plastics, compostable items,
8 and their role in this discussion.

9 So we're sort of charting a course to have the
10 conversation. We can kind of go, what do we think about
11 compostables, but first we need to chart our course. Like, how
12 would we actually achieve a regulatory recommendation that
13 could function? And then within that course, we can talk about
14 the pros and cons, the benefits, the risks, all of those
15 things, and whether or not organic wants to participate. Does
16 that help?

17 BOARD MEMBER DIMITRI: Yeah, thank you. So it's sort
18 of like a new way of thinking about compost to make life easier
19 for everyone, totally separate of the compostable plastics.

20 SECRETARY LEWIS: Yeah, separate but integrated,
21 yeah.

22 BOARD MEMBER DIMITRI: But I mean, even if we were to
23 decide today at this moment that compostable plastics should
24 not be in compost, then this conversation is still important,
25 is what I hear you saying. Okay, thank you.

1 BOARD MEMBER JOHNSON: Thank you so much for all the
2 work you've put into laying this out and going through step by
3 step is helpful. And I'm also with you, Carolyn. It's like,
4 what are we grappling with here?

5 And I've been mulling this over with my
6 environmentalist hat, with my public interest hat, with my
7 consumer who mostly buys organic but also eats pizza and puts
8 the box in that green bin hat, and it's a lot. I think where
9 I'm landing is that if we really want organic to be climate
10 friendly, gold standard, we have to do our part to deal with
11 food waste. Food waste is a huge component of landfills.

12 Landfills are the third biggest source of methane
13 emissions. It's a huge climate issue. So we're balancing the
14 kind of farm interests of the organic community with our big,
15 big picture environmental responsibility to get away from
16 plastics and do our part for the climate.

17 So in specific answer to your question, I think we
18 need to find a way to move from plastics to compostables and do
19 our part to get those into the compost stream that's organic
20 compliant and keep out any extra chemicals that we can. So it
21 seems like it's going to be a combination of paper we heard is
22 kind of in a, oh, it's really coming in. We're not quite
23 dealing with that.

24 So just putting that on the national list isn't going
25 to be a full solution probably because it's probably not all

1 synthetic. So there's something to work out there. There's
2 keeping the universe of compostable bio-based plastics small
3 enough that we're not letting in extra unknown chemicals.

4 There's a lot to work out there. But big picture, I
5 think that's the direction I'd like to see us go.

6 BOARD MEMBER HUSEMAN: That's a lot, Allison.

7 I just leaned over to Nate and I said it's a compost
8 sandwich. We've got a lot to tackle there. But I liked how
9 you articulated what you did.

10 BOARD MEMBER D'AMORE: I tried to get my hand back
11 down. I don't know that I'm going to be able to articulate as
12 well as I would like. But we listened to a really great
13 presentation today, and it struck me that there was a
14 significant part of what was said by a couple of the presenters
15 that it was a business.

16 So it strikes me, if it's possible, that part of what
17 we might want to think about in trying to create this flow and
18 some degree of progress in the world of compost, can we tease
19 out what's a moneymaker, too? I mean, the compost has value.
20 And is there a way to have the value of that compost drive some
21 of the solutions that we give to the program, to this effort
22 that we're going through? And if I didn't make sense there,
23 I'm just going to say sorry.

24 SECRETARY LEWIS: Just to sort of summarize what we
25 heard today, is that the organic claim, while not exactly

1 applicable to inputs, is still driving that industry's demand.
2 And so it's sort of like organic adjacent. You can't put the
3 seal on a bag of compost.

4 But we are conveying benefits of the organic
5 principles to this type of compost. So I think there is a
6 business case to be made for how the organic marketplace can
7 drive, you know -- Wood, you said it best, give us the food,
8 leave out the garbage, and is there a way to use the organic
9 marketplace to get that food out of the landfill?

10 BOARD MEMBER TURNER: I was just going to reiterate
11 that point. I just want to make sure I understand what you're
12 saying, Allison, because I'm coming to sort of a different
13 conclusion where I feel like I don't want the stuff in the
14 stream. So I want the food in the stream. I don't want the
15 contaminants in the stream. And I feel like one position might
16 be to move in that direction. I mean, I actually would like to
17 see as much food as possible in the green bins. And none of
18 the other stuff.

19 And I think one way to do that is to not let the
20 stuff be put in there, period, the end. I mean, I'm happy to
21 continue to caucus on this and keep working through this.

22 I'm not trying to be strident here, but I'm just
23 trying to say that's what I feel like I'm hearing. And I don't
24 know why we're -- I said it earlier, I don't know why we're
25 burdening the land with this problem and not solving the

1 recycling problem. Globally.

2 To me, I work in San Francisco. I listen to the
3 person in San Francisco talk about this. It is an
4 embarrassment to walk around downtown San Francisco to me and
5 see just enormous amounts of biodegradable, compostable,
6 whatever word you want to put on it, plastic being used by food
7 places, food businesses all over downtown San Francisco, and
8 filling up trash cans. That's not a zero waste solution. It's
9 something else entirely.

10 So I just, again, I'm happy to continue to caucus on
11 this. That's where I'm at right now.

12 SECRETARY LEWIS: Thanks, Wood. I saw on the queue,
13 I saw Nate and Brian. And was anyone else? And Allison.

14 Okay, so Nate, Brian, Allison.

15 BOARD MEMBER POWELL-PALM: Yeah, I'm saddened by the
16 thought that I will never be with a group this smart in
17 anything else I do. Because you said exactly what I've been
18 noodling on all day, that are we asking the right questions
19 about what should be our responsibility? And if we're saying
20 that we're going to deal with the plastic, we want less
21 plastic, let's make less plastic then, as opposed to let's
22 figure out how we are going to absorb it into our systems and
23 be responsible for something that we didn't do.

24 And I would also echo this idea that we want all of
25 the food to go into compost and get it done. But, again, that

1 does not mean that we can't. If we're bad at sorting now, it
2 doesn't mean that we're going to get any better just by letting
3 this stuff in.

4 And so thinking about how do we get more food waste
5 sorting and where is it going to happen, I think would be more
6 my question for how do we get as much food waste going in
7 without anything else in it. And so I think that's, you know,
8 I'm feeling less burdened by needing to take care of this
9 problem and more logistical about how do we just start to help
10 folks get more food waste streaming into these systems?

11 SECRETARY LEWIS: Brian?

12 BOARD MEMBER CALDWELL: I'm going to pass.

13 SECRETARY LEWIS: All right. Allison? I've got you,
14 Jerry.

15 BOARD MEMBER JOHNSON: Yeah, I mean, I wholeheartedly
16 agree with both of you. And I think we didn't hear any
17 comments to the contrary. We all want to get off this single-
18 use item system.

19 It's disastrous. And I'm looking around this table,
20 like often I remember to bring my bug. Often I don't. And
21 we're really far from a place where every restaurant, every
22 airport, every venue has glass, metal, dishwashers, the pieces
23 that we would need to go fully reusable. I think it's
24 imperative that we get there. But in the meantime, if we stick
25 with the plastics, there's some recycling that could be

1 improved, but you're not making a new bottle. You're making,
2 like, bricks that go into some other use. It downgrades each
3 time it goes through the cycle. And that's all new fossil fuel
4 use.

5 So I think this in-between step that we're in, we
6 have an opportunity to take a step in the right direction while
7 doing all the other things, too. And one other point, as we're
8 talking about equity, 80 percent of landfills and incinerators
9 are in BIPOC communities.

10 So it's a disproportionate burden on people of color
11 to continue to put things in landfills.

12 SECRETARY LEWIS: Go ahead, Kyla.

13 CHAIR SMITH: My turn. This is great, guys.

14 I think one of my big takeaways from the panel, and
15 Mindee had asked about what things we want to consider adding
16 to the national list.

17 Like, that's what we're on here, right? And so I
18 heard some of the big problems were the produce stickers. So I
19 think that needs to be up for consideration. And then I heard
20 the liners. So I'm putting those into the soup pot that we
21 should really tackle those, because those were the two that I
22 feel like I heard the most talked about.

23 SECRETARY LEWIS: Thanks, Kyla. Jerry?

24 BOARD MEMBER D'AMORE: Thanks. I, too, am feeling
25 awfully good about how you put that, Wood. And as you

1 developed it, the trailing thought was, and there's just
2 plastic everywhere, and why do we have to fool with it, blah,
3 blah, blah, blah.

4 Are we, perhaps, getting close to wanting to say to
5 ourselves that we cannot be the perfect drivers of this
6 problem, that we are not the people to fix it? That would take
7 me back to plastic mulches and the recognition that with
8 plastic mulch, our organic farmers are responsible for putting
9 down 1 percent of that mulch, and we're not going to be able to
10 fight 99 percent. We're just going to put our farmers out of
11 business.

12 So as you were speaking, this was welling up in me,
13 and it was actually your comment, why do we have to fool with
14 it? My contention is we don't, and we shouldn't. There's
15 someplace better to do this.

16 SECRETARY LEWIS: Thanks, Jerry. Just to give folks
17 a queue updates, we have Franklin, Mindee, Carolyn, Nate
18 Powell-Palm.

19 BOARD MEMBER QUARCOO: All right. I'll keep mine
20 short with Wood and Nate on this issue. It was part of the
21 question that I asked during the session. So that's about it.

22 BOARD MEMBER D'AMORE: Franklin, I'm sorry. I missed
23 that. Could you restate that?

24 BOARD MEMBER QUARCOO: I'm with Wood and Nate on this
25 issue, and then with you on it. And actually, during the

1 session, the question I posed to the panel, it had a little bit
2 of this in there. So I don't think we need to absorb.

3 It's a problem that needs to be solved. None of this
4 is really here.

5 SECRETARY LEWIS: Go ahead, Mindee.

6 BOARD MEMBER JEFFERY: In honoring Allison's comment
7 and thinking about the petition from BPI and thinking about
8 everything California is trying to do, I really honor all of
9 that. And so for me, as the NOSB, if we are going to add
10 synthetics to the national list, what's the mechanism? So,
11 like, if we were going to do produce stickers and liners, are
12 we referring to an ASTM standard?

13 Like, for me, I need mechanism as the NOSB. And so
14 I'm not sure I feel really good about the ASTM standards, and
15 I'm happy to be more educated on this front. But looking at
16 the 90 to 180-day breakdown, which really isn't what industrial
17 composters are doing, there's some hesitancy for me to rely on
18 that, because I think looking at what certifiers said about
19 what they would have to do to make that work in evaluating a
20 compost program looks kind of problematic.

21 And then I want compositional information. We look
22 at manufacturing, we look at environments, we look at human
23 health, and so if we're adding synthetic substances to the
24 national list, our job is to have all of that information. And
25 it seems like there's a problem for the compostable packaging

1 industry to give us that information, because there's a lot of
2 polymers and there's a lot of processes, and that's a big
3 universe.

4 And so I don't know where the regulatory coherence is
5 for me. And for me, it's a metaphor, and it's a kind metaphor
6 in my perspective, in that organic had this problem in the '80s
7 and '90s. We had a lot of certifiers with standards, and we
8 didn't have regulatory coherence.

9 And now we do. And we mostly have to reference
10 regulatory coherence in order to get our job done. And so help
11 me with that as we move forward, so that when, if, how there's
12 a path for compostable packaging in organic, that's clear and
13 inside of our process.

14 And so to me, that's the compromise. That's the
15 path, that if we want produce stickers, like let's say we start
16 out with produce stickers and bag liners, because that's
17 functional for us. Then, like, okay, how do we evaluate that
18 in our technical review process?

19 And then that establishes a path for the future of
20 compostable packaging to come to us and have us be able to
21 relate to them inside our mandates.

22 SECRETARY LEWIS: Thanks, Mindee. Carolyn?

23 BOARD MEMBER DIMITRI: I have a few thoughts. One is
24 I think composting those biodegradable plastics, the packaging,
25 is a really good idea. I don't think it belongs in organic. I

1 mean, I don't think any -- I mean, maybe I would be willing to
2 talk about it, sort of what Wood said, but I don't think I
3 could ever really get behind it.

4 But maybe another question I have is, is this the
5 best way to do this process, is to do the -- redo the compost
6 and then think about the petition at the very same time, or
7 does it make more sense for you to do your compost thing and
8 come up with what you think and then address the petition in
9 the context of that? And that's -- yeah.

10 SECRETARY LEWIS: Well, just to clarify, the petition
11 is not before us, so we don't really have an opportunity to
12 address it directly. But your point is well taken. Nate
13 Powell-Palm?

14 BOARD MEMBER POWELL-PALM: I was waiting for Jerry to
15 bring up the "it's not our problem to solve this issue." And I
16 think hearing from Matt on the compost panel, this isn't going
17 to stop the production of compost, and that would give me most
18 hearts. And when I think about the whatever number that we
19 couldn't quite get to use on the billions of pounds of cattle
20 manure, that there's a lot of things to think about, but us
21 taking plastic into our stream, I think, is a separate issue,
22 rather than inventing new bio-mulches.

23 And I think this is one where we can say no and have
24 an impact.

25 SECRETARY LEWIS: I'm going to call on myself to

1 share just I think what informs my opinion, which is that there
2 is already plastic in our organic compost. So I understand
3 that many stakeholders feel like the regulation is working well
4 now, but in my opinion right now there's already too much
5 plastic contamination in compost use on organic farms. So for
6 me, if there's any opportunity for some of that to be a
7 compostable product that can break down and become staple
8 organic matter, that is a win.

9 And that is what informs my muted enthusiasm for
10 trying to find some sort of pathway for a compostable product
11 to enter the organic composting stream.

12 Wood, then Jenny.

13 BOARD MEMBER TURNER: I just wanted to -- sorry, I
14 just noticed when you said the thing about the petition not
15 being before us that Jenny had a reaction to it, and I wanted
16 to get you to react to it. One of the things that does bother
17 me about this is that there is an issue before us that has
18 implications for what we do in this process that has come to us
19 through a different means.

20 And I'm curious about that, and I'd love to have
21 some, like just, it's almost like that petition that is really
22 not before us, there's a reason for that. And I'd like to just
23 acknowledge that and understand that better.

24 DR. TUCKER: This is advanced process management. So
25 in terms of how we're doing Board management here and just how

1 all of these things play, I'm trying to be really, really
2 specific now when we're talking to the team of are we talking
3 about a petition for the Board or a petition for rulemaking?
4 Because it's the same work, but they're really, really
5 different.

6 So the petition for rulemaking did come to the
7 program. So the program does have a responsibility, under some
8 law somewhere, to analyze that request for rulemaking, that
9 petition for rulemaking.

10 We did give you a work agenda where it does ask you
11 to work on the topic of compost and organic production, submit
12 feedback or recommendation that addresses the requests and
13 issues raised in the BPI petition for rulemaking, as well as
14 the issues raised by the Board. So we have, in some ways, kind
15 of deferred, instead of us doing analysis on the petition for
16 rulemaking to start with, we've deferred it to the Board to
17 work on those issues.

18 I will say from a very practical perspective, anytime
19 there's a petition for rulemaking, we have to do something,
20 right? It is a formal tool. So we can deny the petition for
21 rulemaking.

22 We've done that on a few cases. The rules are that
23 we can deny a petition for rulemaking if we have a well-
24 reasoned reason for doing so. It's not arbitrary and
25 capricious. We've done a thorough analysis, and this work is

1 part of the analysis.

2 We can move ahead through rulemaking, or we can
3 continue to analyze them. There are some petitions for
4 rulemaking that agencies have where they've been analyzing it
5 for decades, but they continue to analyze it, so they're doing
6 it. So those are kind of the three paths.

7 I will say the reason we asked you specifically to
8 look at the petition for rulemaking is if we do go to
9 rulemaking on this topic, it would be a heck of a lot better to
10 get input from this at this stage that can feed in, so we're
11 not doing the whole, in rulemaking, get all these surprises and
12 have the Board say, well, why didn't people say this during the
13 Board process? So that's why we wanted you to work on the
14 petition, is we're starting at the very beginning, getting a
15 full picture to feed into rulemaking.

16 That was probably way more you needed, but this is a
17 really new process, and how we play this three-dimensional
18 chess game is important.

19 BOARD MEMBER TURNER: Yeah, and just to be clear, I
20 was less concerned about how it came to us and more about how
21 it came to you. That's more of my concern. I appreciate being
22 engaged.

23 I appreciate that we were engaged. I'm more
24 concerned about how it came to you.

25 DR. TUCKER: How it came to you?

1 BOARD MEMBER TURNER: How it came to NOP. How it
2 came to NOP.

3 DR. TUCKER: To NOP? We got a letter. We've got
4 about five of these, I would say, in the last five years, so
5 this is not an uncommon tool.

6 BOARD MEMBER TURNER: Okay.

7 SECRETARY LEWIS: Thanks so much for that
8 clarification, Jenny. Allison.

9 BOARD MEMBER JOHNSON: I'm glad you raised that,
10 Wood, because I think partly the direction the petition went
11 has to do with a disagreement on the role of the nationalists.
12 If someone was petitioning a material to us, it comes to us,
13 but I understand BPI's position to be it doesn't have to go on
14 the national list, so it would go around us. So just being
15 explicit that our determination about the role of the national
16 list is part of the mix and authority.

17 SECRETARY LEWIS: I'll just share one more opinion.
18 It does not seem as though our analysis of this issue is
19 concluded. Okay.

20 I see sort of a nodding of heads there.

21 BOARD MEMBER JEFFERY: No, that's why I wanted to
22 kind of get through those buckets, because I feel like there's
23 some stuff we can pretty clearly work through in crops, that we
24 can provide some really clear information. We got great
25 feedback from the stakeholders, and I think I heard a lot of

1 yes go in that direction in that section. But I think in this
2 part, I want to hear the path, and that's what I don't know
3 yet.

4 And so I don't particularly like the thought of all
5 of the constituents that make up compostable plastics and how
6 they break down. I don't want them in compost that goes on
7 organic land for organic crops or organic feed for livestock.
8 But because our job is a function of democracy, I do want us to
9 create the path by which those materials could be evaluated.

10 And so that's my interest in the situation, is if
11 we're going to look at produce stickers and liners for sure,
12 still the same question.

13 SECRETARY LEWIS: Any other comments, questions?
14 Well, I appreciate you all turning on the jets at the end of
15 the day for really robust deliberations. I'll turn it back to
16 Kyla or Logan.

17 BOARD MEMBER PETREY: I'll give it to Kyla. Thank
18 you all. Thank you, Mindee.

19 CHAIR SMITH: Okay, we reach the end of day two,
20 everybody. Okay, so we will be on recess until tomorrow
21 morning at 9:00 a.m. Central. Again, thanks for everybody for
22 sticking with us in the room and in the Zoom land.

23 The links, again, will all be the same tomorrow. And
24 we will kick it off with handling tomorrow morning. And we're
25 going to take a Board photo.

1 So Board members don't go anywhere. Just stay right
2 here. And then we're going to go take our photo. And that
3 also is for the NOP staff. NOP staff also is on picture time.
4 Thanks, everybody.

5 (Whereupon, at 5:51 p.m., the meeting was recessed to, to
6 reconvene on Wednesday, May 1, 2024, at 9:00 a.m. CST.)

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CERTIFICATION

This is to certify that the attached proceeding
before the:

NATIONAL ORGANIC STANDARDS BOARD

IN THE MATTER OF: NOSB Board Meeting, Spring 2024
PLACE: Milwaukee, Wisconsin
DATE: April 30, 2024

was held according to the record, and that this is the
original, complete, true, and accurate transcript which has
been compared to the recording accomplished at the hearing.

Elaine M. LaRosee

Elaine M. LaRosee, CDLR
Official Reporter

	164:15	acidification (1)	191:18;192:4;203:9;	adhesives (2)
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UNITED STATES DEPARTMENT OF AGRICULTURE

NATIONAL ORGANIC PROGRAM

NATIONAL ORGANIC STANDARDS BOARD MEETING (NOSB)

SPRING 2024

Wednesday,

May 1, 2024

Hilton Milwaukee City Center - Arena

Wright Ballroom

9:00 a.m., CST

Day 5

National Organic Standards Board (NOSB) Members

Kyla Smith, NOSB Chair

Amy Bruch, NOSB Vice Chair (Virtual)

Nate Lewis, NOSB Secretary

Brian Caldwell

Jerry D'Amore

Carolyn Dimitri

Kim Huseman

Mindee Jeffery

Allison Johnson

Dilip Nandwani

Nate Powell-Palm

Logan Petrey (Virtual)

Franklin Quarcoo

Wood Turner

Javier Zamora (absent)

USDA/National Organic Program Staff

Dr. Jenny Tucker, NOP Deputy Administrator

Erin Healy, Director, Standards Division, NOP

Jared Clark, Acting Assistant Director, and

National List Manager, Standards

Michelle Arsenault, Advisory Committee Specialist

Andrea Holm, Agricultural Marketing Specialist, Standards

Heather Kumar, NOSB Technical Support Staff

Johanna Mirenda, Agricultural Marketing Specialist,

Standards

AGENDA

Call to Order

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1 PROCEEDINGS

2 (Time: 9:00 a.m., CST)

3
4 CALL TO ORDER

5 CHAIR SMITH: It's powerful with this mic. Last
6 day, woo-hoo. Thanks everybody for sticking with us.
7 Welcome back, day three. We have two subcommittees to get
8 through today, so we are going to start with CACS and then
9 we will move to handling. We will sort of split handling at
10 some point with a lunch break. So -- and then when we come
11 back, we'll finish up and then we will be done-ish. We'll
12 review the work agenda, talk about maybe a few things in new
13 business or additional items, and -- yeah.

14 So I'm going to turn it over to Amy. She's the
15 chair of CACS.

16 COMPLIANCE, ACCREDITATION & CERTIFICATION

17 SUBCOMMITTEE (CACS)

18 VICE CHAIR BRUCH: Great. Thanks, Kyla. Good
19 morning, everybody. Day three. What an exciting time we've
20 had the last couple days. And we'll keep the momentum going
21 here.

22 The Board and, in particular, this subcommittee and
23 the people that serve on it are very special to me. I've
24 been honored to chair this committee, the CACS Committee,
25 for three years. We do have big shoes to fill because three

1 of our super seniors -- Kim, Nate, and Jerry -- are going to
2 be rotating off, sadly -- unless we can convince them to
3 stay. But I wanted to make that plug. We have a lot of
4 incredible voices on this committee, and it's been a
5 pleasure to be a part of it.

6 Also, there's a lot of passion within our
7 subcommittee discussions. The path forward is not always
8 black and white. And especially when we're dealing with
9 complex topics that dive into practice standards,
10 regulations, and advising the secretary.

11 However, we know these topics are of critical
12 importance to the community, and we charge ahead. Our work
13 agenda items stem from the following categories:
14 enforcement, USDA, and NLP's commitment to climate-smart
15 agriculture, NLP's implementation of the transition to
16 organic partnership program, and advising the secretary on
17 other aspects of implementing OFPA.

18 From a macro viewpoint, these work agenda items are
19 very interconnected to the farm gate. I'm blown away by the
20 level of participation from both experienced commoners and
21 new voices on our specific work agenda items. We had an
22 impressive turnout by farmer stakeholders this last comment
23 round. We've come a long way from my first year. We only
24 had a handful of farmer voices. And now we have farmer
25 voices contributing, I believe it was over 50 farmer voices,

1 both written and oral, this comment period. So, pretty
2 impressive, the level of participation we're seeing from
3 that group.

4 This is the pathway to make positive change for our
5 organization, and we heard you loud and clear. One more
6 additional plug that I'd love to slide in here is the need
7 for representation in the form of an organic policy advisor.
8 So please, please, please, community, help us out with
9 elevating that need.

10 In addition to tackling four work agenda items this
11 past semester, we enjoyed some early cross-collaboration
12 partnership with PDS. Many of the members of CACS are also
13 on PDS. And topics, as Nate mentioned yesterday, exploring
14 more of what the Board can do with equity, and also,
15 optimizing food tech support or conversations, we started in
16 CACS, but we're -- we thought, better suited, for the PDS
17 subcommittee to take on those initiatives.

18 So without further ado, let's dive into our agenda.
19 We'll have approximately 20 to 25 minutes per work agenda
20 item. And we're going to mix up the order just a little
21 bit. So we did this in advance. I know Allison's ready,
22 but I'd love to start with opportunities and organics,
23 improving support for organic transition proposal. So we
24 will be voting on this. And I'm going to turn over the mic
25 to Allison. Thank you.

1 PROPOSAL: OPPORTUNITIES IN ORGANIC - IMPROVING
2 SUPPORT FOR ORGANIC TRANSITION

3 BOARD MEMBER JOHNSON: Thanks so much, Amy, and to
4 the rest of the subcommittee for being willing to take on
5 this important and timely topic. So we're about a year and
6 a half into the \$300 million-dollar organic transition
7 initiative. And just as a reminder, the initiative has
8 three arms: it has farmer support through the Transition to
9 Organic Partnerships program -- the TOPP network; it has
10 market development through the organic market developments
11 grants; and it has funding for transitioning farmers through
12 conservation programs and a crop insurance discount.

13 So this is our third NOSB meeting where we've had
14 the opportunity to hear from people and organizations
15 involved in TOPP. And I continue to be so impressed with
16 how the people have stepped up, how much has been achieved
17 in a really short period of time, and how thoughtfully this
18 program has been adapted to every region and every state.

19 Dr. Tucker noted in her opening remarks that
20 through TOPP, they've already identified 20,000 people
21 interested in transitioning -- that's phenomenal, and so
22 much potential for bringing acreage under organic
23 management, creating job opportunities, and creating more
24 access to organic food across the country.

25 So we have three and a half years to go of this

1 initial initiative. And the subcommittee's proposal is
2 aimed at providing USDA with feedback on the organic
3 transition initiative to date to maximize the benefits of
4 public investments in organic transition and ensure that
5 organic is relevant to a more diverse population.

6 We gathered -- excuse me. You'll notice that I've
7 had more coffee than food this morning, so -- and I have to
8 take some water breaks.

9 The proposal is directed -- oh, sorry. I'm jumping
10 ahead. Okay. We gathered feedback on the discussion
11 document last fall, and we built this proposal around four
12 main themes that emerged in the public comments. Supporting
13 economically viable opportunities in organic, reducing costs
14 of certification by offsetting costs that organic producers
15 bear, investing in relationships and trust building, and
16 diversifying and expanding the organic community.

17 The proposal is directed across USDA, not just
18 toward NOP, because we really need all of the agencies' arms
19 working together to make the most of the opportunities in
20 front of us. So we hope that each agency that's working on
21 the program will be doing continuous self-reflection and
22 gathering feedback directly from the community, in addition
23 to taking a look at the feedback that we've gathered here.

24 And, Amy, thanks for the plug. This is also a
25 function that the organic policy advisor can help with, if

1 that position were filled. And we hope it will be.

2 We got really positive feedback on the proposal
3 overall. Lots of support and appreciation to the Board for
4 capturing the input that we got in the fall. We had a lot
5 of commenters note that we need relevant staffing and
6 coordination across USDA. And, in particular, we heard a
7 lot about the inconsistent access to NRCS funding. Places
8 where it's working well, it's been extremely valuable.
9 Farmers are getting really impactful amounts of money, but
10 some places it's not working at all.

11 So we heard from Dr. Tucker, a call to really do
12 some grassroots advocacy and outreach to our NRCS offices to
13 help train them. And we also hope that USDA, in receiving
14 this feedback, will continue to work from TOPP down to make
15 sure that there's coordination. Costs of certification
16 remain a concern. A couple of specifics that came out in
17 public comments, an idea that small urban growers with many
18 sites could benefit from grower groups to make the costs
19 lower and more manageable. And also comments about
20 restructuring cost share, so that growers don't have to pay
21 up front and then get reimbursed.

22 We had a request to name the farm bureau in Section
23 3 which talks about reaching more organizations generally,
24 and working through organizations that producers trust. I
25 don't think it makes sense to add specific names to the

1 document, but I did want to acknowledge that, and we could
2 think about whether we need clarifying language to make that
3 section more specific.

4 We also heard again about needing to reach farmers
5 of color and the organizations that we trust. We heard from
6 Kenya in the TOPP presentation that in Kentucky, black
7 farmers aren't interested yet. And she's doing a lot of
8 work there to build trust to leverage existing relationships
9 to help meet farmers where they are and see what might be
10 possible in the future.

11 There were a few conflicting or comments in tension
12 with each other -- several comments about the need for scale
13 and fairness, the need for consistent enforcement, and
14 fairness in the marketplace. Sort of in tension with
15 comments about size thresholds, potentially prohibiting
16 participation in USDA programs. So scale and size continue
17 to be points where we need some nuance and thought about how
18 to move forward and who's included and how we can structure
19 programs to make sure funding is meeting the greatest need
20 and creating opportunities that wouldn't otherwise be there.

21 We also had a couple comments about what's
22 happening on the land during the three-year transition
23 period. We had a request to test out of the three-year
24 transition period, and we had a request to adopt definitions
25 that would make sure that we're not just looking at

1 prohibited substances during the three-year transition, but
2 it's also really about adopting a management system during
3 that period.

4 We heard a little bit about the need for support
5 beyond the transition period. I think, Amy, you brought up
6 what does TOPP look like in the 2.0 form. And we also heard
7 that it's harder for existing operations to access resources
8 through NRCS programs. And we had one commenter suggest
9 that the initial TOPP support be followed with three years
10 of on-farm training and education, so that we are setting
11 farmers up to continue to succeed and thrive in organic.

12 And then, finally, we got a few comments that would
13 require congressional action. So it's outside the scope of
14 this document that's directly addressing actions that USDA
15 could take, but I'll just mention them for completeness.
16 There was a lot of support for codifying the organic
17 transition initiative and funding, staffing, and support for
18 it in the long term.

19 There were comments around certification costs
20 and raising the exemption cap to put organic in reach for
21 more people. So I just want to acknowledge those and note
22 that Congress is working on its fiscal year '25 budget right
23 now, and the farm bill -- there was an announcement from
24 House Agriculture this morning, and I think we'll see a few
25 more announcements in the coming days. So stay in touch

1 with your members of Congress, if those issues are important
2 to you, but they're outside the scope of what we'll be
3 addressing here.

4 So to sum that all up, I think a big hurrah, for
5 the most part, and also continued discussion and interest in
6 seeing how this program grows over time. And I'd love to
7 hear what you all think.

8 VICE CHAIR BRUCH: Thank you, Allison. I
9 appreciate your overview there. I'm actually going to turn
10 it over to Kyla, because she can read the room a lot better
11 than I can from my vantage point to facilitate Q and A.

12 So back to you, Kyla.

13 CHAIR SMITH: Thanks, Amy. Thanks, Allison.

14 Questions or comments for Allison? Go ahead,
15 Nate.

16 SECRETARY LEWIS: Allison, in your summary you
17 mentioned something that was just so dear to my heart, and
18 that is building consumer demand. And I was wondering if
19 you could speak a little bit more to -- if you felt like
20 there was a theme or a through-line for some action that
21 folks were suggesting -- not necessarily we would do, but
22 that could be done in order to build that demand?

23 BOARD MEMBER JOHNSON: It's a good question. It
24 came up a lot in the fall, less so in this round of
25 comments. But, yeah, I think a really clear call for market

1 development in parallel with support for transition, so that
2 we're not getting out of step in supply and demand.

3 I think the retailer toolkit is a great start. We
4 heard positive responses to that. I'll just note one little
5 piece that maybe is subtle in the proposal, but it mentions
6 food and nutrition services. So the role of federal
7 procurement as a stable market for organic didn't hear a lot
8 of that this time, but that is included in the proposal as
9 another tool that we can use to start to grow demand and
10 secure markets for organic producers.

11 SECRETARY LEWIS: Thank you.

12 CHAIR SMITH: I'll make a comment. I mean, I feel
13 like -- yeah. A lot of great work has gone into this really
14 great funding and resources coming out of OTI and TOPP. And
15 so I think for me, yeah, we want to see this continue,
16 right, and just acknowledging that some of what's in here is
17 a little bit outside of NOP's control. And I know we talked
18 about that quite a bit in subcommittee. And so I think this
19 is useful for USDA to be aware of and just trying to like
20 temper our expectations like a little bit for the program.
21 So, anyway, just -- yeah, all of that.

22 BOARD MEMBER JOHNSON: Yeah. Thanks for bringing
23 that up, Kyla. And, you know, I constantly look back at the
24 Organic Foods Production Act, and our job is to advise the
25 secretary so the proposal is specifically directed to USDA

1 at large, with a number of sub agencies named. We know we
2 have the closest relationship to the NOP, and they're
3 currently overseeing the TOPP Program, so there's a really
4 great through-line there. But it's essential that all the
5 different arms of USDA are working together in coordination
6 to really maximize the benefits of the outcomes that we see.

7 And so we'll make sure in the cover sheet for the
8 recommendation, assuming -- well, depending on how the vote
9 goes -- can't assume anything -- that it's very clear who
10 this is directed toward.

11 CHAIR SMITH: Thanks, Nate and Allison.

12 SECRETARY LEWIS: I think I have a question and a
13 comment, but can you talk a little bit more about the
14 discussion around -- I see that land access has sort of
15 touched on, to some extent, in regards to succession
16 planning. I think that's really great. The -- any sort of
17 considerations about just farmland preservation in general
18 and it's -- we need to -- you know, we can't be an organic
19 farm unless there's a farm to begin with. So I'm curious if
20 you have any thoughts on that. And then, just a comment on
21 the federal programs there.

22 BOARD MEMBER JOHNSON: Yeah, thanks, Nate.

23 I think especially in reaching underserved
24 communities, land access is number one. If you don't have
25 land, you can't think about being an organic farmer --

1 whether it's access to a fair lease that's long term or
2 affordable land that's under an easement.

3 So we scoped this proposal around the organic
4 transition issue because there's something specific to react
5 to, but I think, just as we're thinking about farm bureau
6 and other not organic focused farming groups, we should be
7 thinking about what land organizations could be connected
8 into TOPP or how we could use maybe market development
9 grants to help someone access land that then has some
10 infrastructure on it or, you know, get creative about making
11 sure that's in scope because it's a huge barrier.

12 SECRETARY LEWIS: That's great. And then, I think
13 just a comment I'd like to share on that is that my
14 employer, Washington Farmland Trust, its previous name was
15 the PCC Farmland Trust, which grew out of PCC markets in
16 Seattle. And until 2015, we did have an affirmative organic
17 certification requirement under -- on all of our
18 conservation easements.

19 We decided to modify that, sort of at the advice of
20 counsel, because tying a perpetual land encumbrance to a
21 federal marketing program is a less than secure foundation.
22 However, a number of our easements still contain that and
23 land preservation, in general, is a good tool for securing
24 the future for organic production.

25 The -- you know, reducing those sort of threats of

1 conversion I think can be really helpful in convincing
2 farmers to make the investment in organic and that
3 transition. So that's one comment.

4 And then, the other is just sort of acknowledging
5 the state-by-state inconsistencies in service that we will
6 encounter when working with NRCS. And I really, sort of,
7 support the regional aspect of that because problems in Iowa
8 are different than those in Washington, and having a
9 centralized policy or program -- you just can't accommodate
10 each regional -- each region specifically.

11 However, that also impacts success of programs in
12 areas. So, you know, I'm just sort of naming it that
13 there's advantages to the state-by-state approach and
14 there's also challenges. So I think we're always going to
15 be in this situation where EQIP is working great in
16 Washington for a certain activity, and not so great in
17 Nebraska for a certain activity. I don't know if we can be
18 that clearinghouse for communication or, you know, what-
19 have-you, but it's an intriguing problem that we're still
20 trying to wrestle with. NRCS's programs related to land use
21 preservation and the agricultural conservation easement
22 program which works great in Colorado, hasn't funded a
23 project in years in Washington State.

24 So it's a challenge, and so I'm just sort of
25 acknowledging that and appreciating that an OSB can be a

1 forum to air those challenges or differences in service and
2 perhaps summarize them so that there's some -- they could be
3 addressed.

4 CHAIR SMITH: Yeah. And I think that's a -- just a
5 good opportunity to recognize the kind of the magic of
6 organic. If you had a program like this in any other
7 sector, the idea that a bunch of competitors would come
8 together, work together, share information, develop
9 mentorship between theoretically competitors, and just help
10 each other grow is incredible.

11 I know a lot of organizations involved in TOPP have
12 put decades into thinking about transition and how we can
13 better support farmers, and then, others are brand new to
14 this. And so just the generosity of time and spirit is
15 really incredible. And I think we're going to have to rely
16 on that to get all the pieces of this program working
17 together effectively.

18 Dilip, please go ahead.

19 BOARD MEMBER NANDWANI: Thanks, Allison, for your
20 review on the TOPP. Really appreciate it.

21 And being part of TOPP from Midwest I would, you
22 know -- just a comment, not a question, that in just a short
23 amount of time, like I would say that about six to eight
24 months, the Midwest -- I don't know a detail about the other
25 regions -- but the Midwest, we heard on other day and being

1 part of that, I can vouch that the tremendous progress have
2 been made. We already heard on the other day. And the
3 beauty thing -- part of this is that a lot of partners --
4 most of the partners, I would say, they are involved with
5 this -- not only the universities, they are partnering as an
6 education and outreach events, but there are market
7 developments. There is a -- they are working with NRCS,
8 getting so many advice, very closely with them. And other
9 federal agencies also, you know, like rural development and
10 local rural organizations and state government and, you
11 know, state government as well.

12 So I would say that this is a good program we
13 started, thanks to NOP. And it's good progress in just six
14 months of time. So I would imagine in five years, we'll
15 definitely have a very good progress. Thank you.

16 BOARD MEMBER JOHNSON: Thanks, Dilip. It's great
17 to have TOPP participants on the Board, in addition to in
18 the community, to -- you know, vent all of this -- and get
19 feedback in real time. So I hope this proposal won't be the
20 end of this kind of continued self-reflection, gathering
21 information; and that NOP and other agencies involved can
22 also reach out to the community directly and continue to get
23 that feedback as things move along.

24 Still got three and a half years, and a year and a
25 half in. There's a lot to applaud already. So I'm excited.

1 CHAIR SMITH: Jerry, please go ahead.

2 BOARD MEMBER D'AMORE: Yes. If there's a segue
3 to -- and I heard this just a moment ago of assigning value
4 to the organic program, that I'd like to add to that. And
5 so bear with me.

6 Over the last three or four years -- let me back
7 up. Farming is tough. The business of farming is tough.
8 Farmland has always had value and is one of the things you
9 really want to have in your back pocket in an investment
10 portfolio. And one of the things in the last three or four
11 years that has emerged in the business of agriculture and
12 the transfer of businesses between generations to
13 corporations -- and I don't want to talk about the value of
14 that, I just want to talk about the value of one thing -- is
15 that in the last three or four years the operations being
16 evaluated by financial institutions have a pecking list of
17 what they're looking for. And within the last five years on
18 top of that list is organic.

19 They will look at organic faster than they'll look
20 at conventional. That doesn't mean they'll consummate
21 things faster, but just that fact that the organic seal has
22 become recognized by the financial community as a plate of
23 value and points of consideration, I think, is quite
24 phenomenal and something that, you know, we haven't talked
25 about collectively here. Thank you.

1 BOARD MEMBER JOHNSON: Thanks, Jerry. It's a
2 really good point, and I think we'll have a bit of
3 discussion throughout the day around, sort of, how being
4 organic helps or hinders access to finance access to market
5 opportunities. So it's a really important thing to keep in
6 mind.

7 And just to spread one other reflection that a lot
8 of the early work, in TOPP especially, has been these kind
9 of intangibles -- relationship building, building this web
10 of communication that's hard to quantify. But I think
11 the -- every time we see the TOPP program participants
12 present, it's very clear that that's the groundwork that has
13 to be there for everything else to follow it. So numbers
14 and sort of like the soft stuff at the same time.

15 CHAIR SMITH: Amy, I saw your hand go up and now
16 it's down. Did you have a comment?

17 VICE CHAIR BRUCH: Oh, yeah. I just had a comment.

18 Allison, thanks so much for elevating this topic.
19 I think the need for the feedback and being a clearinghouse
20 was definitely there. TOPP -- it's really an incredible
21 investment into organics, and we're really blessed to be
22 able to have it. From a farmer point of view, I hope this
23 program does continue. I hope, you know, this feedback that
24 was collected will be integrated in the best way possible
25 and really look at, you know, encouraging 2.0.

1 I know you mentioned that in your presentation --
2 your -- kind of your overview, but I think it's necessary.
3 I know recruitment was the primary focus, but, you know, as
4 we heard kind of on the first day, we need to also look at
5 retention as well.

6 So this is -- it's pretty incredible to think how
7 it was launched and how quickly it was executed. And I
8 commend everybody a part of the process for making this
9 happen. It really makes a difference.

10 CHAIR SMITH: Okay.

11 VICE CHAIR BRUCH: All right. Kyla, are there any
12 other questions?

13 CHAIR SMITH: No. I don't see any questions or
14 comments, so we will move to the vote. The motion is to
15 accept the proposal on improving support for organic
16 transition. The proposal comes to the Board from
17 subcommittee with a motion by Allison and a second by Jerry.
18 And we will start the voting with Dilip.

19 BOARD MEMBER NANDWANI: Yes.

20 CHAIR SMITH: Franklin?

21 BOARD MEMBER QUARCOO: Yes.

22 CHAIR SMITH: Nate Lewis?

23 SECRETARY LEWIS: Yes.

24 CHAIR SMITH: Allison?

25 BOARD MEMBER JOHNSON: Yes.

1 CHAIR SMITH: Brian?
2 BOARD MEMBER CALDWELL: Yes.
3 CHAIR SMITH: Jerry?
4 BOARD MEMBER D'AMORE: Yes.
5 CHAIR SMITH: Carolyn?
6 BOARD MEMBER DIMITRI: Yes.
7 CHAIR SMITH: Wood?
8 BOARD MEMBER TURNER: Yes.
9 CHAIR SMITH: Mindee?
10 BOARD MEMBER JEFFERY: Yes.
11 CHAIR SMITH: Logan?
12 BOARD MEMBER PETREY: Yes.
13 CHAIR SMITH: I did hear a quiet yes.
14 UNIDENTIFIED SPEAKER: (9:27:03) A quiet yes.
15 CHAIR SMITH: We got you Logan.
16 Amy?
17 VICE CHAIR BRUCH: Yes.
18 CHAIR SMITH: And the chair votes yes.
19 BOARD MEMBER HUSEMAN: Excuse me.
20 CHAIR SMITH: Oh, shoot. I -- before the vote, I
21 was like, I am not going to forget to go around the table,
22 and look what I just did. Kim? Sorry.
23 BOARD MEMBER HUSEMAN: Yes.
24 CHAIR SMITH: Nate?
25 BOARD MEMBER POWELL-PALM: Yes.

1 CHAIR SMITH: Okay.

2 SECRETARY LEWIS: Fourteen yes, one absent. The
3 motion carries.

4 CHAIR SMITH: Back to you, Amy.

5 DISCUSSION DOCUMENT: RESIDUE TESTING
6 FOR A GLOBAL SUPPLY CHAIN

7 VICE CHAIR BRUCH: Wonderful. Thank you, Allison.
8 Appreciate that.

9 Now we're going to move on to a discussion
10 document, residue testing for a global supply chain. So we
11 have some slides for this one. And I'll kick things off.
12 This is a really important topic to me, oversight and
13 enforcement. I believe this is the fifth different topic
14 that the committee has brought up in four years looking at
15 oversight and enforcement. We'll advance the slide and kind
16 of dive into the overview and background.

17 I do want to emphasize that organic is a process
18 based standard. We heard that from the community. We
19 understand that. We know that. And we are looking at this
20 as testing as a tool for compliance verification. And then,
21 in this initial background I do want to appreciate all the
22 conversation and the information and the rollout of SOE.
23 It's very impactful to our community. And I loved
24 Dr. Tucker telling us about some of those early wins with
25 SOE. There's going to be several levels of impact, but it's

1 awesome to hear of the initial success. And SOE provides
2 that supply chain transparency. It's requiring brokers and
3 importers, handlers, to have organic certificates, which is
4 great. Everybody is getting above radar there. And then --
5 and also import certificates are going to be hugely helpful
6 to understand a lot more with clarity what's coming into our
7 country.

8 However, testing provides the verification. So
9 it's kind of a twofold approach. We have transparency, and
10 then we need verification, and that's the part of continuous
11 improvement. You know, we're looking at this now. It's not
12 going to be implemented necessarily now. These things take
13 a little bit of time, but it's good to have the next thing
14 in the queue. And we feel really passionately -- and we
15 heard from the community that testing really needs to be
16 looked at as that next piece.

17 We want to get more into the proactive mode,
18 you -- we're a little bit playing catch up. Some of our
19 equivalency partners are more advanced on the testing route.
20 We heard that through public comments. And then, also
21 through public comments we heard, we want a level playing
22 field. We heard that over and over again, not just from
23 farmers -- handlers as well, importers. We heard that from
24 a lot of different voices. Level of playing field. We love
25 competition, let's just make sure everybody's playing by the

1 same rules here.

2 And it did -- this comment period, there was an
3 increased sense of urgency. So this is something that's
4 really important to dive into and unpackage so we can come
5 forward with the right proposals to the program.

6 We wanted to, this go-round, really focus on
7 building the house first. So focus on the -- or, sorry --
8 building the foundation first for our house. So focus on
9 those foundational elements, testing protocols, and
10 procedures need to be rock solid.

11 Public comment stated that pesticide screening is a
12 valid and cost-effective way to test many low risk
13 operations, but we're looking at those high risk operations.
14 So sophistication, strategy, and savviness is necessary. We
15 need to build out those testing protocols to reflect more
16 instruction on testing for other vulnerabilities outside of
17 just pesticides.

18 And then, again, I wanted to highlight, we did hear
19 voices from all perspectives of the value chain -- farmers,
20 handlers, and importer inspectors, certifiers, banker,
21 investor farmer organizations, advocacy groups, certifiers,
22 inspectors, trade groups. So we did get a collection of
23 information about how we can advance this initiative, and
24 I'm really thankful for that.

25 As we advance to the next slide, this is

1 something -- kind of a flashback from day one. I loved
2 seeing this marketing information and the different pillars
3 that the organic community stands for. I just wanted to
4 pose the question: Do we need a fifth pillar that says,
5 "Trusted and verified"? So something to think about. Do we
6 want five pillars to our house. But I thought it was very
7 impactful, the statements that are made here, but also
8 hearing from our consumers that trust in a verified system
9 is important.

10 I'm going to kick it over to Nate now to summarize
11 more of the public comments that we've received from our
12 specific questions to stakeholders. And then, we'll wrap
13 this up and open it up to discussion.

14 SECRETARY LEWIS: Thanks, Amy.

15 Before I jump into there, I did want to just
16 provide a little bit of my own thoughts around SOE, in
17 particular. And my colleague, Kim, used the metaphor of an
18 ocean liner and an eggbeater. And my assumption is that
19 that was to convey the magnitude of what we're trying to
20 achieve through SOE, but I fear that folks watching this
21 process may be concerned that that is an expression of
22 futility, or that we -- you know, it's hard, I would imagine
23 -- and I'm not a shipping/receiving expert, but I don't
24 think an eggbeater would be a great way to pilot one of
25 those. So I would like to offer the community a different

1 metaphor, so that everyone who's listening and watching can
2 understand that we mean business and we think SOE is going
3 to shape and change the face of organic.

4 And that metaphor is that SOE is moving us from a
5 map and sextant to a GPS, in terms of how we're navigating
6 this course. And forgive me for pushing this metaphor just
7 a little bit too far, but that testing is one of the
8 satellites by which this GPS system will be tracking our
9 course. So I just wanted to offer that and, again, forgive
10 me in advance for abusing my microphone here and pushing
11 this metaphor too far.

12 But I really just wanted to communicate to those
13 that are watching that SOE means business. It is a -- it
14 appears to be already an effective tool at curbing some of
15 the concerns we've seen. And I personally have a lot of
16 faith in its ability to really change the marketplace.

17 (Applause)

18 SECRETARY LEWIS: So down to the granular details
19 on residue testing. A topic I'm really, really excited
20 about. Amy did a great job teeing this up, that testing is
21 a tool for verifying compliance and validating systems for
22 preventing contamination of organic products. We have a
23 suite of guidance documents at the -- in the program
24 handbook for certifiers to -- as guidance for certifiers
25 conducting residue sampling. And as part of SOE rule

1 rollout, we felt it was important to take a fresh look at
2 these and update them with some additional detail and some
3 additional context to help certifiers as they're evaluating
4 compliance and verifying compliance to a broader and more
5 global supply chain.

6 So first up is NOP 2610, which view the sampling
7 procedures. So these are the procedures by which you are
8 supposed to collect samples. This includes information like
9 how many pounds of wheat do you need to include in your
10 sample to get a good sample to a lab for testing? And how
11 do you document and do chain of custody sorts of things.

12 So the way we approached it is we have this suite
13 of guidance documents and we asked some specific questions
14 about each one and received comments. So these are a brief
15 summary of what we heard and we'll then -- Amy and I'll sort
16 of tag team a foreshadowing of where we think we're going to
17 move this work.

18 In terms of sampling procedures for residue
19 testing, there was a lot of interest in more information and
20 more procedures regarding the sampling of soil, water,
21 waste, seeds, plant tissue, et cetera. So we have good
22 information around sampling of finished commodities. We
23 need a little bit more information about some of these other
24 sampling activities that certifiers may choose to conduct as
25 part of their review.

1 Consistent sampling protocols are needed for new
2 test type -- new types of tests. So we are looking at tests
3 certifiers can do of -- for prohibited substances that are
4 not pesticides. And those require some familiarity and
5 comfort with what types of tests are asking -- they should
6 be asking the laboratory for, and whether or not there's a
7 specific protocol related to those tests.

8 Laboratory selection criteria for pesticide residue
9 testing, we need to spell out a little bit more what
10 specific validated methods and acceptable laboratories
11 should be -- spell what -- sorry. We should spell out more
12 specifics about validated methods and acceptable
13 laboratories. So we need to make sure the labs that are
14 partnering with certifiers on providing those results can
15 and have methodologies that are approved within their
16 accreditations to provide reliable results.

17 So as we move beyond the standard multiresidue
18 pesticide screen and the standard herbicide screens, we need
19 to make sure those laboratories are accredited to do those
20 types of tests, and we have can have confidence in their
21 results. And that sort of summarizes the second bullet
22 there as well.

23 The document which I think may -- we may see the
24 most changes is in the 2611-1, which is the list of
25 prohibited pesticides for NOP residue testing. This is just

1 a list of prohibited pesticides. It's an incomplete list.
2 There's a lot of other pesticides not included on this list
3 which are prohibited in organic -- you know, of most -- the
4 most glaring omission is glyphosate and dicamba. These are
5 used all over the place. It's not on this list. We all
6 know it's prohibited, but adding it to the list could be
7 valuable.

8 But we also got some really good feedback about
9 this document, perhaps, being transformed more into a
10 risk -- an evaluation of risk and a decision tree. So if
11 you're at this sort of operation and you observe such and
12 such a condition, what would be the most appropriate test to
13 take? And just adding a little bit more, sort of, thinking
14 around what types of tests are appropriate for which types
15 of scenarios and which types of inspection observations that
16 are made, I think it could go a long way in helping
17 certifiers sharpening the point of that spear, in terms of
18 their compliance verification.

19 So I think folks can anticipate some work from the
20 subcommittee on rethinking that this particular guidance
21 document, in terms of its usefulness for certifiers and
22 targeting tests on specific operations at specific points in
23 the supply chain.

24 And then, 2613, which is the responding to results
25 from pesticide residue testing, this is where the rubber

1 hits the road. So this is where you've taken a sample;
2 you've gotten a result; it is positive or it's not; and you
3 need to respond to it. This is where the compliance piece
4 really starts.

5 And what we have now I think works really well for
6 the multiresidue pesticide screens that we are accustomed to
7 taking. It is less clear when we start moving into things
8 that aren't pesticides, like synthetic solvents which are
9 equally prohibitive. There is no sort of gradient of
10 prohibition on these things. A synthetic solvent is just as
11 prohibited as glyphosate in an organic system. So detection
12 of that is an indication that there's a prohibited substance
13 on the product, but we don't have an FDA action level or an
14 EPA tolerance because it's not a pesticide. And that's an
15 area -- that's just a gap in the information on this
16 guidance document, which I think we will need to work to
17 fill that gap, so that certifiers have the confidence in
18 responding to results as they're starting to take on new
19 types of sampling and new types of -- and receiving new
20 types of sample results.

21 So next steps in discussion, I think I sort of
22 covered a lot of this, but just in summary, we will likely
23 be proposing updates to NOP guidance on residue testing,
24 lists of prohibited substances, potentially for a decision
25 tree, sampling procedures and lab selection criteria,

1 responding to positive results. And a public comment that
2 we received about the regulatory requirement that ACAs
3 provide results of residue testing to the public, and a lack
4 of clarity around that process, that may be an area we dig
5 in as well to provide some input there on how certifiers
6 should determine when their investigation has ended and the
7 results are now made available to the public or -- there's
8 no sort of clarity, as we heard, around, do you submit a
9 FOIA request? How do you interact with a certifier, if
10 you're a member of the public and want access to that that
11 information?

12 And then, the last piece was around testing of
13 input products. I think that's also an important part of
14 our residue sampling portfolio, but I want to make sure CACS
15 takes chewable mouth bites on these big topics. So I think
16 this is on the punch list, but I don't want it to bog down
17 the work on testing of our certified organic agricultural
18 products. But it is in -- it's in the parking lot, I would
19 say. And I think the group focus on testing is interested
20 in making sure there's no fraud in inputs, making sure we
21 have reliable tests to determine when contamination of
22 compost, for example, has exceeded what -- you know, what
23 organic farmers are expecting. And, clearly, there's a lot
24 to unpack there, including oversight of MROs, which is a
25 broad accreditation-related topic.

1 So I want to make sure folks understand here that
2 we value and think those concerns are important, and that
3 we're not ignoring them. We are simply trying to address
4 them one step at a time.

5 Amy, do you want to add anything to the next steps
6 in discussion conversation?

7 VICE CHAIR BRUCH: You hit on quite a few of the
8 topics that were on my mind. I think the additional one is
9 just the risk piece. We are a risk-based system, and we
10 need to make sure that we're updating and keeping current
11 the definition of the new risks that our program is facing.
12 And that was a common theme with a lot of contributions from
13 certifiers and inspectors, too. So we'd like to -- and,
14 yeah, we'd just like to dive into that further, whether
15 that's integrated in some of these guidance documents or
16 another initiative.

17 But, Nate's exactly right. We want to make sure
18 that we're advancing some of these initiatives at a pace
19 that is possible and not necessarily just hold onto
20 everything and present an omnibus approach that's got a
21 million parts to it. So we'll look to kind of segment this
22 off.

23 But, yeah. Thank you so much. And I'd like to
24 open it up for further discussion, review of any other
25 comments. And I'll turn it over to Kyla for that.

1 CHAIR SMITH: I see Wood, and then Brian.

2 BOARD MEMBER TURNER: Thanks, Nate. It was a great
3 overview. And a lot of complexity, and it does concern me
4 about all the things that you guys have flagged, in terms of
5 sort of not making it overwhelming, in terms of how to get
6 this done.

7 And I know a lot was made about the EU protocols
8 and rejecting US products from that side. And I'm curious
9 if there's any learning from that process that you've
10 applied to some of this thinking. And if there's -- I mean,
11 it seems like to me, just simply speaking, it would be
12 interesting to just almost take whatever is happening from
13 that side of the pond and apply it from this side. And I'm
14 just curious if that's too simple or --

15 SECRETARY LEWIS: That's a great question. I'd
16 also really be happy to hear Amy's thoughts on it, but I'll
17 start. I think, my understanding on the EU or, we should
18 say, it's -- you know, as I heard last night, there's no --
19 really no such thing as Europe. There's, right, nation
20 states that group themselves into the EU, but the nation
21 states are definitely testing a lot of US products. And I
22 think they know where our weakness is, which is glyphosate
23 and Roundup. We are addicted to Roundup. It's used in
24 every cropping system. It rains Roundup in Nate Powell-
25 Palm's neck of the woods -- and probably other places in the

1 country. I'm just sort of partial to Montana myself. So
2 I -- that really hurts.

3 So they know where our weakness is and they know
4 how to keep our products out of their markets. I think it's
5 really a WTO issue that we're dealing with on that.
6 However, I think we can learn from the strategy because we
7 don't want -- they don't want contaminated product coming to
8 Europe. And I think the motivation is noble. And I think
9 we can learn from that where we don't want contaminated
10 product or fraudulent product coming here.

11 And I think that's why you have heard Amy and I
12 both sort of continuously coming back to the synthetic
13 solvent test, which is something we don't do, we don't have
14 a framework for, and is one of the best tools for
15 determining whether a seed meal has been produced using a
16 synthetic solvent or produced using an expeller press, which
17 would be how organic products were produced. So it's not
18 exactly direct -- you know, I don't think we're trying to
19 start a trade war with this. I think we're trying to learn
20 that we can identify where the weakness is and home in on
21 that.

22 The trade dispute, though, I really think is a WTO
23 issue. And I would love to kind of, adjacent to the NOSB,
24 kind of explore, how do you even take a nation state to a
25 forum to discuss trade issues at the WTO.

1 So, you know, I'm from Washington State. If folks
2 remember the WTO protest, it's sort of ironic that I'm now
3 looking and saying, oh, maybe the WTO is offering us a
4 solution here. But maybe it is. So, hopefully, that's
5 helpful.

6 And, Amy, please go ahead, too.

7 VICE CHAIR RUCH: Yeah. No, that's a good call-out
8 on the glyphosate, Nate. I was going to actually pass it
9 over to Nate Powell-Palm, because on this topic and several
10 of our topics we divide and conquer. And Nate had some real
11 specific in-depth conversations with point people with the
12 EU. So I see we're panning to Nate. I'm going to have you
13 jump in here.

14 BOARD MEMBER POWELL-PALM: I think I would take a
15 starkly different view, Nate Lewis, on WTO, only in that
16 there's been -- I mean my state, and I think a lot of other
17 farmers have gotten whipped by not being able to sell our
18 products into Europe. But I think I would take inspiration
19 saying, why can't we test just as much and make sure that
20 products coming into America are as closely scrutinized as
21 those that we are exporting.

22 And so I don't think for now that we actually need
23 to think of WTO, because I think that gets very complicated
24 very fast, but rather, that we're just going to play catch-
25 up, and by enhancing the testing that we do, we'll be just

1 catching up; that there won't be anything that we really
2 need to have like a dispute over, necessarily.

3 VICE CHAIR BRUCH: Yeah. I would echo that. And
4 one thing to mention in the SOE, we do have now import
5 certificates. And that was also a thing that the EU or the
6 member states were executing on is these import
7 certificates. So I would just echo the fact that it's just
8 kind of more of a catch-up with some of the testing that's
9 being conducted at this point in time.

10 We can look for benchmarking as much as possible,
11 but I think the idea is to put similar barriers that other
12 countries are having already.

13 CHAIR SMITH: Brian, please go ahead.

14 BOARD MEMBER CALDWELL: Thanks, especially to Amy
15 for really having the foresight on this. And it's
16 incredibly timely -- and having the persistence. It's
17 really a good thing.

18 I want to get back to some basics. And I'm just
19 wondering, how do we envision the system? So who
20 initiates -- I'm thinking, in particular, of imports coming
21 into the ports of entry. Who initiates the testing? Who
22 oversees the testing? Who gets the results of the testing?
23 And who pays for the testing? I would love to have that
24 kind of clear in my brain. So, thanks.

25 BOARD MEMBER POWELL-PALM: I'm going to jump in

1 there, if that's all right.

2 SECRETARY LEWIS: Yeah. Go for it, Nate.

3 BOARD MEMBER POWELL-PALM: I think that's going to
4 be something we're going to determine. Right now it's --
5 testing is -- the way we test in organic is a well-developed
6 muscle. But as we've heard so many folks describe, it's
7 probably not sufficient right now.

8 And so right now we've got the 5 percent testing
9 rule where certifiers, by their own expense, are testing. I
10 think as we envision a much more sweeping, that we would
11 have to re-envision where that's -- all of that burden
12 falls. I don't envision a world where we're saying,
13 "Certifiers, please give half your budget to testing at your
14 own expense." And, in a way -- and I think that there's a
15 question here, sort of philosophically, the folks who are
16 going to be benefiting the most from importing into our
17 market are the most solvent. And so I say that with all due
18 respect, these are not small farmers who are trying to bring
19 their goods into this country. They are well organized,
20 high volume, high revenue organizations.

21 And so when we think about who is benefiting and
22 who could share in this responsibility, I think there's some
23 questions there for who is most suited for it.

24 BOARD MEMBER CALDWELL: And thanks, Nate. And I
25 wonder if Jenny might chime in on that. I kind of asked a

1 question about that before, but any more ideas would be most
2 welcome.

3 ADMINISTRATOR TUCKER: Okay. So I mentioned on
4 Monday, you know, we are doing more testing at the program
5 directly based on, you know, what we perceive as risk
6 related to both geography and commodity. So we're doing
7 more directly -- direct testing. Certifiers also do a lot
8 of testing. It's not just the 5 percent; they also do
9 separate testing to support investigations. If you go onto
10 our enforcement web page and look at settlement agreements
11 and look at decisions, you'll see actually there is a fair
12 amount of testing going on.

13 I would also say that those companies that Nate is
14 referring to, we are certainly aware that many of them are
15 doing their own testing as well. Right? They have brands
16 to protect, and they don't want anything -- any fraudulent
17 product on the market either. And, certainly, we know of
18 some very large buyers in the United States who have
19 diverted some of their imports into the conventional market
20 because of testing results that they, themselves, took.

21 So there is work happening at all levels on
22 testing. And so it's not just an oversight -- of oversight
23 agencies that do this. I do -- these companies do have
24 brands to protect. It does sometimes feel like -- well, the
25 assumption is that everything's fraudulent, and then, you

1 know -- and I think we need to be careful with that because
2 there's a lot of legitimate imports, a lot of legitimate
3 trade, and these companies have their brands to protect as
4 well.

5 So I try and be realistic. I'm not trying to be
6 Pollyanna-ish here, but I think there's actually more
7 testing going on that is necessarily in the public sphere.

8 SECRETARY LEWIS: Brian, if I may just add some
9 thoughts to -- I think your question is great because
10 it's -- you can write everything you want on a piece of
11 paper, but you got to actually do the tests and do the
12 enforcement. I think there are a number of testing programs
13 that certifiers are not engaging in right now because of a
14 lack of guidance around them. So we're trying to fill that
15 gap. And that's one of the audiences that this -- these
16 updates will be aimed at, but I think they'll also be aimed
17 at NOP's compliance and enforcement division, customs and
18 border protection, and really whomever is going out and
19 testing. So we want to make sure they know what we want
20 them to test for and what to do, if and when they get a
21 result.

22 So I think there's a number of audiences for this
23 work. First and foremost, the certifiers, because we know
24 that testing is happening. The other potential testers are
25 a little bit more opaque to us in the public, but I think

1 this could be helpful for them in doing their own -- their
2 testing as well.

3 BOARD MEMBER CALDWELL: Yeah. I'd say a lot of it
4 is opaque. But I think that the, sort of the -- what's
5 behind -- partially behind my question is, of course, if a
6 big financial burden is on the certifiers, that gets
7 translated to the farmers, most -- almost all of whom are --
8 well, for some certifiers are domestic producers and not
9 really kind of a player in this whole thing. So I would
10 just love to see ways that we can tap into some of the
11 private testing that is being done.

12 I would have to say that I think that some big
13 buyers enjoy a depressing push on the price, and so they
14 might not be so motivated to find out, but some of them are.
15 So that, in the collegial spirit of organic, maybe we can
16 work on that on accessing and sharing some of that
17 information, keeping it confidential within confines, but
18 helping with the effort. So, thanks very much. Really
19 appreciate it.

20 ADMINISTRATOR TUCKER: And I'm certainly not
21 denying that there are bad actors out there. Right? The
22 people who -- and I've often said over the years, and some
23 people don't like it when I say it -- I want to keep saying
24 it -- you choose who you buy from. Right? You choose who
25 you buy from.

1 CHAIR SMITH: Okay. Logan, I had seen your hand up
2 before, then you put it down. So did you have a question or
3 comment?

4 BOARD MEMBER PETREY: Thank you for checking in.

5 CHAIR SMITH: Okay. Then I have Nate Powell-Palm,
6 then me, then I saw Amy.

7 BOARD MEMBER POWELL-PALM: I think in the heaviness
8 of all of this question about, you know, what does the
9 market look like and the citation of bad actors, I'm really
10 enthused about this, just this work agenda item in general.
11 I think that there's a lot of confidence that we can claim
12 on behalf of consumers that we're able to describe better.
13 What does it look like? We are testing. We are verifying.
14 And that's something that I've heard so much, just when
15 folks want a trash organic. They don't even test. There's
16 no way to know. That this sort of gives us a little bit of
17 a leg up, if we're thinking about how can we do this better
18 and use this tool more effectively.

19 CHAIR SMITH: Thanks. Okay. I have three points,
20 I think. First, regarding the public access. So I just
21 want to point out that although it is not specified in
22 205.670 any more details around that, it is called out in
23 205.504(b)(5), which is the --

24 SECRETARY LEWIS: I must have missed that.

25 CHAIR SMITH: -- the administrative policies and

1 procedures. So it does require that certifiers have
2 procedures in place to provide to the public, upon request,
3 the results of laboratory analyses for residues of
4 pesticides and other prohibited substances conducted during
5 the current and three preceding calendar years. So I just
6 wanted to make sure that was on the public record.

7 Secondly, Nate, when you were talking about the
8 prohibited pesticide list, 2611-1, and the fact that like
9 glyphosate's not on there, I do believe most of those things
10 are part of that multiscreen test, and glyphosate is not
11 part of that multiscreen test. And so I don't know -- yeah,
12 how we format that or, you know, or whatever.

13 If it was part of that, that would be phenomenal
14 because -- and I don't know that that's possible, just based
15 on laboratory methodologies and how they're testing. But if
16 they were able to figure that out to have that be part of
17 that multiscreen test, I think that would be great because
18 currently certifiers and inspectors are having to take
19 multiple samples, and to the next part of that, to have
20 that, you know, sort of matrix or whatever to provide more
21 information for surveyors and inspectors to -- for different
22 types of crops, time of year, what is typically sprayed in
23 the conventional system, would be really helpful so that,
24 you know, we're not just having to pick and choose, oh, we
25 take this one sample and send it for glyphosate, and then

1 nothing shows up, but really something else is on there.
2 And we like -- anyway, and -- but the more samples you take,
3 the more cost you're -- like the cost increases. So,
4 anyway, all things to think about, but that's what I was --
5 where my head was going.

6 And then, around third-party testing. So
7 certifiers are unable to take enforcement currently when we
8 receive -- based solely on that. Right? So if a third
9 party, like the -- you know, our own certified company tests
10 and, you know, they can do -- take action, but if we get
11 that information provided to us, it might trigger an
12 investigation. But we can't take -- issue an adverse action
13 or something solely based on that test, if we didn't perform
14 it ourselves. So just something else to think about.

15 SECRETARY LEWIS: Yeah, thanks. I think I can shed
16 some light on at least the second topic right now, which is,
17 I think, the barrier to including glyphosate in the
18 multiresidue screen is science. I think that that just
19 doesn't work in the laboratory system, but I think that
20 there is an interesting thought there about suggesting
21 working with laboratories who are willing to bundle and
22 discount testing or something like -- something to that
23 effect.

24 CHAIR SMITH: Yeah.

25 SECRETARY LEWIS: Yeah, because it's 300 bucks a

1 pop for your multiresidue screen and 300 bucks a pop for
2 glyphosate. So if you're not sure what was sprayed, what
3 are you going to spend your money on? But bundling or
4 suggesting that could be something that might put a
5 laboratory at a competitive advantage to working with
6 certifiers. So point well taken.

7 CHAIR SMITH: Amy, I think you're up next.

8 VICE CHAIR BRUCH: Yeah. Thanks, Kyla, for
9 bringing the certifier point of view up front. I think
10 that's the thing when I look into this, we just need to work
11 together. There's a lot of numbers in the value chain there
12 saying we need assistance. We want to ensure a level
13 playing field. And I think figuring out the fees and the
14 methods, I think we can figure that out. I don't think
15 that's going to be the bottleneck to execution here, but we
16 definitely need to have open conversations on how we can
17 execute this and make it as burden-free and pain-free as
18 possible, just to get the needed information, because at the
19 end of the day, you know, these guidance documents, a lot of
20 them were updated in 2011. I think there's a lot we can do
21 to provide more clarity and consistency and ease to execute.

22 I think it was really clear from certain people
23 that are that are kind of in the weeds on some of these
24 investigations that looking at pesticides is not always
25 going to be where we find the fraud. So we need to broaden

1 our scope to these residues and we need to be strategic,
2 instead of trying to throw the kitchen sink at something and
3 not find what, you know, what the problem is.

4 And then, I want to also highlight a comment that
5 that's been in our queue a couple times that does say AMS
6 has a legal responsibility to ensure that NOP has adequate
7 regulatory standards, enforcement guidelines, and residue
8 testing procedures in place to implement a reasonable and
9 effective monitoring system.

10 So I think that's the -- that's where I kind of end
11 up. We got some work to do to polish these guidance
12 documents up and make them relevant for the current
13 environment that we're playing with. And, again, I think
14 the voice of the farmer says, give us a playing field.
15 Let's just ensure all are playing by the same rules and
16 we'll be happy to compete. So that's kind of my final
17 statements on this. That's really important. I love to
18 hear all the feedback because we need everybody's voices in
19 order to make the change that's lasting and necessary here.
20 So, thank you.

21 VICE CHAIR BRUCH: Any other final comments or
22 discussion pieces?

23 CHAIR SMITH: I don't see any more hands up. So I
24 think we can conclude this one and head on to the next.

25 DISCUSSION DOCUMENT: CLIMATE INDUCED FARMING RISK

1 AND CROP INSURANCE

2 VICE CHAIR BRUCH: Okay. All right. So we do --
3 let's see. Next up is climate induced farming risk and crop
4 insurance. This one does have slides. It's a discussion
5 document as well. You know, to just kind of kick things
6 off, this is a recent picture taken a few days ago from
7 Nebraska. And this just kind of articulates the environment
8 in which we're living in. We have extreme swings in
9 weather, and that's kind of the need for discussion on this
10 topic. Much of the NOSB climate change discussion to date
11 has focused on positive benefits of the organic production
12 system and the resiliency that it brings, in terms of
13 climate change mitigation.

14 Let's discuss the impact of climate change on a
15 farm's production risk, which is increasing and changing as
16 climate-induced events are increasing in frequency and
17 scale. The primary tool for addressing risk management is
18 crop insurance. And I know we're evaluating other risk
19 management tools, but the desire is to optimize the risk
20 management tool of crop insurance in the short term.

21 And I'm going to have you advance slides, please.
22 Over the past year we've made several advances on this
23 front. Thanks to Carolyn's work that she's spearheaded on
24 the research side of things, we have a good foundation in
25 which we can launch some ideas from the community for

1 improvements. So really appreciate her work on that.

2 This slide here kind of articulates -- it's --
3 articulate some of the improvements in the progress made.
4 This was thanks, in part, to having our fall meeting.
5 Francie Tolle, from risk management agency, give a
6 presentation and state her commitment to improvement. And
7 some of these have been on the list for organic producers
8 for some time, but we can cross them off the list. And one
9 notable one to mention is RMA allows enterprise units by
10 organic farming practice. So that was one we did hear in
11 public comments a year ago, and it's nice to have that
12 advanced. And it's nice to also -- I mean, all of these are
13 important, but it was nice also to have the updates in good
14 farming practices and techniques, such as the roller crimper
15 rye with soybeans. So you can see there that's an improved
16 practice now. We don't need a written agreement to execute
17 that. So that's really positive.

18 As we go to the next slide, three priorities
19 have emerged, and that's what we're coalescing around as a
20 community. And we heard some good feedback around these,
21 even from produce growers, especially on that first one,
22 quality factor consideration during loss adjustment. We
23 need organic specific quality metrics in loss adjusting.
24 Sometimes yields are above the trigger level. We've heard
25 the trigger level -- that T yield level. We've heard a lot

1 of stories about that, but sometimes yields are above that
2 trigger level. But due to a climatic event, the quality of
3 the crop being grown isn't up to buyer standards. So we
4 need those quality metrics to be very reflective of organic
5 production and not just comparatively looking at feed grade
6 conventional production.

7 The organic agent finder, we've made some
8 progress on this. RMA did launch for whole farm revenue
9 protection, kind of a seek and a find. Those that are
10 familiar writing that whole farm revenue protection policy
11 can be matched up with those interested in deploying that.
12 And we thought as a subcommittee that would be good to also
13 launch that finder technique for just organic agents in
14 general. There are organic agents that are specialized in
15 providing organic producers crop insurance. And it's just
16 kind of knowing the ins and outs -- there's a lot of
17 intricacies with crop insurance and having someone that's
18 got experience is really important. So we'd love to
19 highlight that and make that happen for organic producers.

20 As well as accelerated adjuster visits. A lot of
21 the collection of examples that Carolyn was receiving, it
22 was on the adjuster side of things. Currently the policy is
23 seven to 13 days post-climatic event for an adjuster to
24 visit your field. I always say the difference between a
25 good outcome in an organic field and a bad outcome is 36

1 hours. We need adjusters in our field sooner so we know
2 what to do to mitigate the problems that the climate event
3 delivered to us.

4 So weeds are growing at a pretty high rate and if
5 we enter our fields in too early preadjuster visit, we
6 actually can cause some challenges. So we need to work more
7 closely and get specific organic adjusting standards for our
8 producers.

9 Looking at the next slide is just some additional
10 items that the community in posts -- or in prior
11 conversations had highlighted. We're going to dive in a
12 little bit more on that. Improvement of T yields. We had
13 some good written and oral feedback on how we can improve T
14 yields, but some of these other ones are a lot of
15 conversation. We need feedback loops with some of the new
16 programs that have been launched, such as the Good Farming
17 Practices Handbook. We need a feedback loop to see, do we
18 need continual improvements or is that suiting the needs?

19 One other element to highlight on this list was
20 the transition system plan or transition production plan.
21 We did receive some feedback on that. And that's a new
22 thing that's launched. And that's helpful, because RMA
23 needs verification that a producer is in transition. And so
24 the answer was to develop this transition producer plan or
25 transition system plan. And it's just recently launched,

1 and there's some good learnings that we unpacked from public
2 comments on that as well.

3 So lots more to work on, but as we advance to the
4 next slide, in public comments for continuous improvement,
5 we really focused our efforts around the need for adequate
6 coverage. T yield is something that is a signed yield when
7 absence of production history exists. And this is a great
8 example. This cornfield on the right side if it was a
9 conventional cornfield, the producer, after receiving about
10 40 percent damage would be receiving about \$443 an acre if
11 they deployed multiperil coverage at an 85 percent level.

12 If this field was a new transition producer, that
13 insurance would be \$100 -- or just a little over \$100. And
14 that's still deploying an 85 percent level at the multiperil
15 production. So that that's kind of the quantification
16 there, and we've heard that from public comments.

17 So what do we do about it? We've heard from a
18 lot of written comments and oral comments that we need to
19 build transition yields faster and organic yields faster.
20 And how do we do that? A potential compromise is, instead
21 of looking at altering the actual T yield, it would be just
22 to leverage that transition history and then apply that to
23 when you're organic for an accelerated viewpoint on your
24 production capacity.

25 We also receive feedback from the community about

1 a buy-up coverage. And that's something instead of altering
2 the level of T yields that are out there, we could just
3 allow for producers to purchase more. The cost actually for
4 this type of coverage -- at least from a 65 percent to an 85
5 percent level, is pretty nominal compared to the benefit
6 that it would provide. The question from the community is,
7 what would be the cost of the buy-up coverage? There's
8 three major factors in determining a loss payout, and that's
9 looking at examining the T yields, examining the coverage
10 level, and examining the price.

11 We also talked to the community about using a
12 percentage of their conventional APH for transition or their
13 organic T yields, and that's more of a customized approach.

14 There were some other concerns that remained
15 about a high loss ratio. There's a few commenters that
16 talked about a high-loss ratio that organics are
17 experiencing versus the conventional counterparts. Some of
18 that was -- an attempt to mediate that was a reduction
19 across the board in everybody's T yields that happened four
20 or five years ago. What happens, though, is there's so much
21 diversity within how producers are executing on an organic
22 scale, that maybe because of that diversity we do need a
23 customized approach at looking at prior history of when a
24 producer was conventional, and then assess what their T
25 yield should be, whether their transition organic. So that

1 was another byproduct of the conversation.

2 Additional concerns that the community expressed
3 was, again, on that transition plan, evaluating that. It's
4 a new thing this year. And then, looking at contract
5 pricing, right now there is a ceiling based on a conversion
6 factor for conventional. And so the idea would potentially
7 be opening that contract pricing up to provide additional
8 coverage.

9 So I think at the end of the day producers were
10 looking at being able to satisfy adequate coverage. Whether
11 that's adjusting T yields, whether that's allowing for a buy
12 up on the coverage level, or whether that's looking at price
13 expansion, those are the three factors that come into
14 providing farmers with adequate coverage.

15 Is there one -- do we have one more slide? Yeah.
16 So I wanted to open it up to Board discussion next and talk
17 about next steps. Pictures that have been displayed in this
18 PowerPoint are real examples of climatic events that
19 although organic systems are very resilient when it comes to
20 some of the intensity of the storms that we're experiencing,
21 it is tough to overcome some of these hail and extreme wind
22 events that farmers have experienced. So that's one reason
23 why we look to offer up more robust action items for uptake
24 to make the coverage, at least for organic producers, more
25 equitable when, comparatively speaking, when you're looking

1 at conventional producers.

2 So next steps, the CACS committee has examined
3 where the current system is not helpful for farmers and
4 we'll be planning on bringing a proposal with a finalized
5 list to create positive change. And also, just another call
6 for requests, challenges, at least more examples we have for
7 row crop producers. We also want to make sure that we're
8 reflecting the challenges for produce growers as well. I
9 think the top three items from Slide 2 that discusses
10 specific quality adjustments for organic producers, that's
11 very applicable to the produce growers as well.

12 So with that -- it's a complicated subject, and
13 we've had lots of time to deliberate over the last year, but
14 I wanted to open it up for further discussion.

15 CHAIR SMITH: I have Nate Powell-Palm, then Wood.

16 BOARD MEMBER POWELL-PALM: I just wanted to push
17 back a little bit, Amy, on the line that, "It's a
18 complicated subject." I think you've done just a fantastic
19 job bringing this home for why it matters to producers. And
20 the number of producers, the breadth of producers that we've
21 heard from on crop insurance has just been fantastic.

22 Going back to the progress part of the document,
23 Number 3, could you tell us a little bit more why RMA
24 allowing enterprise units by organic farming practice is
25 significant?

1 VICE CHAIR BRUCH: Yeah, absolutely. That's a
2 good question. It was something that we heard time and time
3 again. Even in this current form of written comments,
4 producers were still asking about it. So education is
5 needed to alert people that it is available -- talk to your
6 agent about that. But the benefit there is sometimes when
7 you're early in your transition process, you might have
8 conventional lands. You might be a parallel operation with
9 conventional status and transition. When folks are
10 deploying an enterprise-type approach to crop insurance,
11 they're aggregating all of their fields together under one
12 unit. So if you have transitional yields, that we all have
13 heard of are reduced with your conventional yield capacity
14 at a higher level, when it's all aggregated together, the
15 overall look of your coverage is a lot lower than what it
16 would be if you were able to separate out your conventional
17 production from your transition production.

18 So it's an ability for a producer that has
19 parallel operations or parallel production to receive the
20 highest level of coverage on each of their fields.

21 BOARD MEMBER POWELL-PALM: And sort of in a --
22 for example, you would lots of times see farms when they
23 transition create one LLC for their conventional operation
24 and a different LLC, which for anyone who started a
25 business, is just a lot of work. And so to be able to not

1 have to do that and having RMA allow for enterprise use by
2 practice seems like a very farmer friendly move. It's
3 just -- reducing the burden on the business of being an
4 organic farmer. One of --

5 VICE CHAIR BRUCH: Absolutely. Thanks for
6 highlighting that workaround. That was the workaround that
7 folks had to do -- not because of a transparency issue. It
8 was really to mitigate the economic challenge with the
9 current policy.

10 BOARD MEMBER POWELL-PALM: One other -- Number 2
11 in the progress report, I have -- Nate Lewis got me on my
12 first fly into DC. And I heard so many farmers saying, "Why
13 is NRCS telling us to intercrop and to do all these
14 progressive agronomy techniques, while RMA is saying, 'If
15 you dare do it, we'll take away your coverage?'" And so I
16 just feel like Number 2 is more astounding and more
17 fantastic than -- we have far and away not given enough
18 credit or whooped it up enough for that.

19 And I was wondering if you could tell us, how do
20 we get the message out about that? I feel like that could
21 be a whole party, in and of itself -- maybe Portland.

22 VICE CHAIR BRUCH: Yeah, exactly. And, Andrew,
23 could I have you maybe go backwards a couple slides, and
24 then we can highlight that specific one for the community?

25 Okay. Number 2, updated good farming practices.

1 Yeah, this is huge. It really is because the -- we had
2 several commenters about advancement of, you know, some of
3 these real cool practices that Erin Silva is using with a
4 lot of no till-type farming scenarios for organic. That's a
5 real adoption practice -- at least in my state, because we
6 do have irrigation and we're able to mitigate some of the
7 risks that others might have to deploy some of these good
8 farming practices. And they're highly adopted in my region
9 about intercropping, and really trying to push them the
10 needle.

11 We, I think as organic farmers, we
12 learn we need to keep advancing and trying new techniques to
13 get a better outcome. And so having the recognition and the
14 reconciliation between NRCS and RMA is really important; and
15 that, I think, is going to come out more if organic
16 producers are coupled with agents that understand organics.
17 I think that word is going to get out quicker. It's a very
18 nuanced thing in our community, and it is tough, as we
19 learned with kind of looking at 823. You don't always know
20 what you don't know. So having folks connected with organic
21 experts, I think, is the best way to get the word out about
22 Number 2.

23 BOARD MEMBER POWELL-PALM: Thank you.

24 CHAIR SMITH: Wood?

25 BOARD MEMBER TURNER: Thanks, Amy. There's some

1 great work here and it seemed like a lot of slam dunk
2 pathways here, just like, you know, a lot of -- not a lot
3 of -- I just want to nod my head at all the recommendations
4 or all the ideas that are been put forth in the document.

5 I'm curious -- I noticed that the document wasn't
6 entirely unanimous, in terms of the committee's view on it.
7 There was an abstention maybe. And I'm just curious if
8 that's a flag for any concern that I should have about
9 barriers to getting this done? Like when the proposal gets
10 adopted, what is the barrier to getting some of this put in
11 place? Can you dumb it down for me?

12 VICE CHAIR BRUCH: Yeah. And that's -- you
13 highlighted a great thing. You know, we are in the midst
14 of, you know, complex -- and I use the word "complex," even
15 though we have a clear pathway of what we can do. But where
16 our authority lies, we're able to work on this work agenda
17 item due to climate change. And similarly to Allison's
18 document within the transition, the recommendations for
19 TOPP, we are not only communicating to NOP for execution on
20 this. This is an interagency-type approach, and we need
21 assistance from RMA.

22 So this is kind of a full court press. We can
23 make the recommendation, but we also need the community to
24 help us get this over the finish line. So that was the
25 reflection of the abstention was just, what is our

1 jurisdiction for the actual recommendation? Should we be
2 listing just challenges, or should we dive into solutions as
3 well?

4 CHAIR SMITH: Nate?

5 BOARD MEMBER POWELL-PALM: Yeah. I was just
6 going to pile on there, that I think from, you know, the
7 work that Allison has done, there is a gray line for, what
8 are we supposed to be doing on this Board? And I think that
9 there's just very few other opportunities to have the entire
10 community tell us where the pain is and what we can improve.
11 And even if we don't have a material solution, or don't have
12 a Sunset to address it, there was on this committee, you
13 know, a slightly difference in philosophy that, should we
14 stick to our lane, or could we be a little bit more
15 expansive. And I'm definitely on team more expansive,
16 because I think it's resulting in a lot of good work.

17 The thing I was waiting for Allison to get back
18 for is in the opportunities for improvement, Number 2,
19 building on our questions about NRCS and our problems that
20 we're noting with the 823 roll-out, having a crop insurance
21 agent who knows organic is the difference between getting
22 coverage or not. And having -- and finding one of
23 those -- the only reason I found mind is because a buddy
24 told me where to look. And the fact that that sort of
25 network is the only way to really tracking down means that

1 somebody who's not nearly as connected as NPP is going to
2 have a much harder time.

3 And so we need to be figuring out how do we make
4 it obvious and easy for where we look. And so I think when
5 we think about equity, there's so much to this second
6 opportunity for improvement that I would say, participation
7 in risk management for everybody participating in TOPP,
8 everybody participating in organic, this should be the
9 priority -- or a significant priority for how do we help
10 this move along quickly to make it a useful and accessible
11 opportunity.

12 BOARD MEMBER TURNER: I'm reeling from the third-
13 party reference, but that's...

14 CHAIR SMITH: Carolyn?

15 BOARD MEMBER DIMITRI: I did that just for
16 Michelle.

17 I abstained. And basically, there's like
18 philosophical differences on how to go about doing this kind
19 of work. And I recognize, as a researcher, like my approach
20 is very different from people who sit as advocates in their
21 real world experience. But I think Mark Lipson raised the
22 really important point that was in the original document,
23 and that is that the loss ratio is close to two for organic
24 policies. And the legislation that created crop insurance
25 said that it has to be one. It was to be -- like the whole

1 program has to pay for itself.

2 And so I kind of came at this from an approach
3 that this doesn't work for the risk management agency and it
4 doesn't work for organic farmers. So I think like from that
5 sense, for us to be saying these are the ways you need to
6 change, given that they have these other institutional
7 constraints that we're not even really acknowledging as we
8 go ahead.

9 And then, my other thought is, initially, like
10 for the last time this discussion document came around, we
11 didn't really get very many suggestions from farmers that
12 were not green farmers. And I have a concern about us
13 representing all organic farmers, just not only organic
14 green farmers. So, anyway, that's kind of the back story
15 there.

16 CHAIR SMITH: Nate Lewis?

17 SECRETARY LEWIS: NPP, your -- or your --
18 you've got my mind churning about your search for an agent.
19 And is there -- like, you know, I can go online and find a
20 doctor in a specialty, based on my health insurance
21 database. Is there anything like that for crop insurance
22 agents?

23 BOARD MEMBER POWELL-PALM: For crop insurance
24 agents, yes.

25 SECRETARY LEWIS: For --

1 BOARD MEMBER POWELL-PALM: For organic crop
2 insurance agents --

3 SECRETARY LEWIS: Well, that's why I just
4 wondered if there was a way to, like, add a little organic
5 criteria to that filter, you know.

6 BOARD MEMBER POWELL-PALM: Absolutely.

7 SECRETARY LEWIS: I don't know. I -- just got
8 my mind going.

9 BOARD MEMBER POWELL-PALM: Yeah. I think
10 there totally is. I think in some counties I've seen folks,
11 especially in, say, Vernon County or Dane County in
12 Wisconsin where you're going to have more organic literacy
13 in general. You'll have folks disclosing that, themselves,
14 voluntarily.

15 Whether or not they're any good is sort of a
16 different question. And so even though they say, "Yeah, I
17 can help you with organic," we want the folks who know --
18 who know how to find the right policies for organic.

19 And I think it's a greater discussion for the
20 community and RMA how they work together to try to both say,
21 if you're interested in organic, let's train you. And if
22 you're good at organic, let's identify you.

23 VICE CHAIR BRUCH: And I will add there's
24 precedents for that right now with the agent finder for
25 whole farm revenue protection. So it is something that has

1 been executed as of this year. You go to the RMA website
2 and you can find an agent that specializes in whole farm.
3 So the request for that, which is pretty minor, is just
4 those that are comfortable writing organic crop insurance
5 can register, and those that want to find them can just go
6 to the website, similar to how they deployed the whole farm
7 revenue protection.

8 And, Carolyn, I think you made a great point
9 there. This needs to work for all. It's not going to work
10 if it's only for RMA or only for organic producers. So I
11 think the need for these open conversations is really
12 important. There's a lot of working groups currently with
13 farmer organizations on crop insurance. And I really
14 appreciate tapping into that information. But at the end of
15 the day, advancements need to be made so they can be
16 lasting.

17 So that loss ratio, I think you had mentioned,
18 Carolyn, when they made the change to T yields for organic
19 producers, it did help the loss ratio -- not to the point
20 that RMA was targeting, but I think it penalized producers
21 because it was a one-broad stroke against the whole
22 community versus looking at some of the nuances and
23 customized approach that could maybe give a greater benefit
24 or greater lift to a farmer, and still maybe get at what RMA
25 is trying to do.

1 But those are great points. I'm glad you were
2 able to elevate those, Carolyn.

3 CHAIR SMITH: Logan, go ahead.

4 BOARD MEMBER PETREY: Thank you. So I
5 hesitate to say a lot on crop insurance, so I don't know a
6 lot about it. And I don't have experience with it really.
7 As an organic vegetable -- I mean, it's not -- it's not -- I
8 mean, I guess we're discussing -- it's not a really well-
9 written thing. And I will say that to compare the grain and
10 the vegetable, I have the same issues, as far as the T
11 yields, like you're talking about, how long it takes to
12 gather an average yield.

13 Also, as the growers mentioned, you know,
14 rotation is really important and it's necessary in organic
15 farming, where it's not in conventional. So it does take so
16 long to get your average T yield to be good. So those are
17 the same problems that grain and vegetable farmers will
18 have.

19 Another problems that are the same is, agents
20 around not knowing how to -- you know, not knowing the
21 policies really well. So I would say that those are in
22 common. And so the document can -- or this discussion
23 document does kind of conquer that as well for vegetable
24 growers.

25 I wish I knew more about it to say, you know,

1 what it doesn't cover for the vegetable, but I know that
2 those two things will be the same.

3 VICE CHAIR BRUCH: Thank you, Logan.
4 Appreciate that. And that I think if we go back one slide,
5 I think that on the -- let's see. Oh, sorry. The --
6 advance two slides -- yeah, one more. This, I think --
7 sorry, back one. Sorry.

8 This -- these three concepts, I do believe are
9 cross-functional, meaning, they do apply to produce growers,
10 as well as row crop producers. And we did hear from one
11 produce group that mentioned the benefits of the quality
12 factor consideration, that that's really important to their
13 industry.

14 Are there any more hands?

15 CHAIR SMITH: I think Nate Powell-Palm had a
16 final thought, and then we can probably wrap it up and move
17 on.

18 VICE CHAIR BRUCH: Great.

19 BOARD MEMBER POWELL-PALM: Just building off
20 of Carolyn's point -- I wish I was better at making
21 analogies, but grain already has, you know, a boat in the
22 water, and it's moving. And so figuring out how can we
23 augment those folks who already have infrastructure and a
24 system working, I think, is a goal of this document.

25 And so when we look to public comments, I was

1 both heartened and, I think it's really something we have to
2 focus on, listening to the tomato grower from Vermont say,
3 "I've never even thought about crop insurance." In my
4 valley, we had a really large hailstorm last June, and it
5 wiped out everything that the farmer had been working to
6 produce leading up to the farmer's market season. So
7 probably like 80 or \$90,000 for a small farm worth of goods.
8 And they had to resort to a GoFundMe, which was very
9 successful, but very depressing, I think, that there wasn't
10 some program out there ready to step in.

11 And so as I think again about recruiting new
12 Board members, I really hope that we can get produce growers
13 on this Board, or at least into public comments who have
14 ideas for what can we start to do to make better insurance
15 progress for produce growers.

16 CHAIR SMITH: Thanks, Nate.

17 Back to you, Amy.

18 DISCUSSION DOCUMENT: ORGANIC FOOD SYSTEM

19 CAPACITY AND CONSTRAINTS

20 VICE CHAIR BRUCH: Yeah. Thanks for the final
21 plug about upcoming Board members. Appreciate that.

22 Thanks for the discussion here. We will
23 continue on with our last discussion document. So next up
24 is organic food system capacity and constraints. The CACs
25 Subcommittee's goal is to build on our previous work on

1 climate change that focused on addressing/managing on-farm
2 risk. So I'm going to turn this over to Nate Powell-Palm to
3 walk us through this document.

4 BOARD MEMBER POWELL-PALM: Thanks, Amy.

5 We heard -- we've been hearing so much from
6 public commenters and the community in general, especially
7 as we talked about TOPP, looking at how are we setting
8 farmers up to transition into a market that works, and
9 really studying, what are those weak points.

10 When we hear from groups who have been in this
11 space a really long time, very similar and consistent
12 talking points are voiced -- you know, seed capacity,
13 capacity and access to land. And we're looking at, can we
14 get some data behind that? Is there a way to actually look
15 at what is stopping all organic grain being grown in this
16 country. And we're looking at an integrity piece, but
17 there's also a logistics piece that my colleague, Kim, has
18 so articulately voiced over and over again. How do we
19 identify what's really keeping that grain from coming to
20 market? What's really keeping growers from being able to
21 access wholesale opportunities?

22 And as a group, questions to stakeholders sort
23 of follow a similar theme that we've heard throughout the
24 last few weeks. Are we able to retain existing producers?
25 If not, why? Why are folks leaving this market? If we're

1 looking at existing producers, what's stopping them from
2 expanding, or are they contracting their acres?

3 And so within an opportunity like TOPP and
4 thinking about how this is just, hopefully, not once in a
5 lifetime, but maybe once in a lifetime, how do we make sure
6 we don't miss this opportunity to really affect the most
7 change possible? And having a better and clearer
8 understanding of what the market is and how we can improve
9 it is the goal of this discussion document.

10 Any questions?

11 I see Amy.

12 CHAIR SMITH: Oh, go ahead, Amy.

13 VICE CHAIR BRUCH: Oh, that's okay, Kyla. Is
14 there something else --

15 CHAIR SMITH: No, ma'am.

16 VICE CHAIR BRUCH: Okay. All right. Yeah. I
17 think this document, along with the others, are very
18 important. I think there's a lot of interconnectedness to
19 the documents, again, that we have presented for CACS. I
20 especially want to reflect amongst a farmer's testimony in
21 the in-person comments that, bless his heart, he did have
22 the entrepreneurial spirit to put in infrastructure to get
23 him a little bit further down the value chain and,
24 unfortunately, that wasn't enough. And he said, after a
25 short time, he actually had to close that facility.

1 So I think it really is not looking at one
2 piece in particular; we need to have a macro view as to how
3 we build this out. It's not always, "If you build it, they
4 will come." We need some extra help, again, with, kind of,
5 playing by the same rules, looking at where our challenges
6 lie, getting the right risk management support, and then,
7 really tackling these markets.

8 There's opportunity here, but it -- I feel
9 like it needs to be more strategically thought out versus
10 just kind of a scatter pot deployment. So I'm not sure
11 who's in that position to look at things from a macro point
12 of view, but I really think that's necessary. And I think
13 this document is going to, hopefully, open up those types of
14 conversations.

15 CHAIR SMITH: Go ahead, Nate Lewis.

16 SECRETARY LEWIS: One element, which I just
17 want to share that I think is important to include here, is
18 the people element of developing markets and not the
19 consumer, but sort of the thought leader component.

20 I understand, you know, there's a lot of
21 factors that go into a robust marketplace, but one of them
22 is the cultivation of and, sort of, dissemination of good
23 information and enthusiasm and support, and that sort of
24 mentor-mentee relationship that TOPP is really centering.
25 And I'd just like to see that. It's -- you know, it's messy

1 because it deals with people, I realize, but I still think
2 we should lean into that because it's -- you know, you can
3 have all the railcars in the world, but if people don't want
4 to -- or the coffeeshop conversation is still awkward
5 because you've gone organic, that can be a barrier that we
6 don't see.

7 CHAIR SMITH: I think that I don't see any
8 other -- oh, wait, Allison has a comment.

9 BOARD MEMBER JOHNSON: Sorry. I'm less vocal
10 than I would be because the Senate Agriculture Committee
11 just announced a big farm bill framework that includes a lot
12 for organic, including a lot that's relevant here.

13 So encourage everyone to take a look at it,
14 react, and we'll still have opportunities to connect up this
15 work with what's happening in Congress. But sorry for my
16 relative quietness -- or maybe you're welcome.

17 VICE CHAIR BRUCH: Excellent views, Allison.
18 Thank you for sharing that.

19 CHAIR SMITH: Back to you, Amy.

20 VICE CHAIR BRUCH: Any other comments? Nate,
21 do you have any other final thoughts on this?

22 BOARD MEMBER POWELL-PALM: Oh, I would just --
23 I really appreciate what Nate Lewis said, and would echo
24 that we need a joyful, an aggressive, a human-centered
25 approach to bragging on how awesome this opportunity is.

1 And I think that's been a challenge that we have been
2 addressing for several years now, trying to get our ducks in
3 a row for how do we message about this. But when I look at
4 this room and all the awesome storied organic growers in
5 this room, folks in public comments, we need to, as a
6 community, be trying to get those folks who just normally
7 don't talk, to start piping up.

8 My favorite line is -- and it doesn't always
9 apply, but, "Those who talk don't know, and those who know
10 don't talk." And we need to get the folks who know to talk
11 and get out there and celebrate.

12 So, thanks, Nate Lewis. Thanks, Amy.

13 VICE CHAIR BRUCH: Thank you. Thanks to the
14 subcommittee. And I will turn it over to Kyla.

15 CHAIR SMITH: Okay. Great. We are going to
16 take a break. Let's come back at 10:50.

17 RECESS FROM 10:39 A.M. TO 10:51 A.M.

18 CHAIR SMITH: Okay, everybody. We're going to
19 get started.

20 Okay. We are moving to Handling Subcommittee.
21 And I am going to pass it over to Allison. She is the chair
22 of the Handling Subcommittee.

23
24 HANDLING SUBCOMMITTEE

25 BOARD MEMBER JOHNSON: Thank you. I think I

1 stole my own audience here by telling everyone to go look at
2 the news. But we have a very packed agenda for handling
3 this year. We've been busy. We have a long list of Sunsets
4 for 2026, and we're already preparing to do another long
5 list for the next cycle for 2027. So really appreciate all
6 the Handling Subcommittee members and how much time and
7 diligence you've put into this. It's a lot to get through
8 and we couldn't do it without everyone's commitment and
9 dedication.

10 We have a couple of petitioned substances that
11 will be voted on today. And I also want to flag that we
12 have a couple more ahead. We're looking at a petition for
13 ethylene. It's currently listed for post-harvest ripening
14 of tropical fruit and de-greening citrus, and the petition
15 is for an annotation change to allow use in potato and onion
16 storage.

17 And then we also have a petition on another
18 listed material, potassium phosphate, that's currently
19 listed for use in products labeled, "Made with organic."
20 And the petition is asking us to remove that limitation, so
21 it could be used in products labeled organic as well. So
22 more from us in the future on those materials.

23 Let me get my agenda and queue keeper out
24 here. So we rearranged the agenda after the packets were
25 assembled. So we're going to be going down this new written

1 list here. So if you're following along in the meeting
2 packet, we're not going to be going in that order, but we'll
3 give everyone a minute to flip to the right material as we
4 go along.

5 So we're going to kick off with three
6 proposals on petition materials. Two of them are very
7 similar, so we're going to present them together. And I'll
8 kick it over to Kyla for magnesium carbonate and magnesium
9 carbonate hydroxide.

10 PROPOSALS: MAGNESIUM CARBONATE, MAGNESIUM
11 CARBONATE HYDROXIDE - PETITIONED

12 CHAIR SMITH: Thanks, Allison.

13 Yes. So in this fall, there were two
14 discussion documents separated, and this round of the
15 proposal I decided to just combine them because it --
16 they're very interchangeable materials and I thought I could
17 save you guys some reading if I just did a combo. So we
18 will take the votes separately, as noted in the proposal,
19 but I'm going to talk about them together.

20 So in December of 2022, we received a petition
21 to add both magnesium carbonate and magnesium carbonate
22 hydroxide as processing aids to the national list at
23 205.605(b). Specifically, as a drying or anticaking agent
24 in organic chicory production.

25 A little history on this material. Magnesium

1 carbonate was previously listed at 205.605, but was removed
2 in 2017 as it was determined to not be essential. And at
3 the time when the material was listed, it did have an
4 annotation that limited it to being used and made with
5 organic products only.

6 As for the manufacturing process, magnesium --
7 and for the remainder of this, I'll just refer to them as
8 magnesium carbonates or MCs. So magnesium carbonates are
9 manufactured through a reaction of a soluble magnesium salt,
10 such as magnesium sulfate, magnesium chloride, or magnesium
11 nitrate with an alkali carbonate, such as sodium carbonate
12 or sodium bicarbonate.

13 Magnesium carbonate precipitates as a solid
14 form from this aqueous reaction. Magnesium carbonates also
15 can -- are naturally occurring in the rock known as
16 magnesite. Although the TR stated that no commercial
17 sources of food grade magnesium carbonates are being
18 produced directly from that rock source.

19 Internationally, magnesium carbonates are
20 generally allowed, but all of the international schemes that
21 are included in the TR -- so Canada, Codex, EU, JAS, and
22 IFORM (phonetic) those -- some restrictions made by Codex,
23 EU, and JAS allowing magnesium carbonates only in processed
24 products of plant origin or, alternatively, not allowed in
25 food of animal origin. Canada restricts its allowance to

1 meat products with the 70 to 95 percent organic content
2 designation which aligns with the "made with" category here
3 in the US. JAS only allows magnesium carbonate, but not
4 magnesium carbonate hydroxide.

5 And the subcommittee did discuss this, that
6 based on the allowance through these equivalence
7 arrangements, that there could be products imported into the
8 US through one of those equivalence arrangements that may
9 have been produced using magnesium carbonates as a
10 processing aid.

11 As far as human health and environmental
12 impacts, the main environmental concern is due to the mining
13 of magnesium, used as a precursor to the substance, and the
14 adverse effect the mining industry has on the environment.
15 This is not unique to this material. And it impacts several
16 materials that are on the national list. And there isn't a
17 human health concern.

18 There are several alternatives currently on
19 the national list, which I'll talk about those in a minute.
20 And we did ask some questions to stakeholders about
21 essentiality. Did we misunderstand the scope? Is there new
22 information since the material was removed in 2017? We
23 asked some questions of certifiers related to nanoparticles,
24 because that was sort of the impetus of the petition,
25 calling into question the presence of nanoparticles in some

1 of those alternatives that I mentioned, such as calcium
2 carbonate and tricalcium phosphate and silicon dioxide.

3 And then, also, just wondering about any
4 impacts or challenges related to importing or exporting of
5 organic chicory powder. So we didn't get very many public
6 comments, but all that we did receive were opposed to adding
7 magnesium carbonate and magnesium carbonate hydroxide to the
8 national list, based on the subcommittee's analysis that
9 this is not an essential substance as there are several
10 alternatives; and that if there is a true concern here from
11 any of those currently listed alternative materials, that
12 petitioning their removal is the better approach.

13 That's all I got.

14 BOARD MEMBER JOHNSON: Thank you, Kyla.

15 Any questions, discussion? I'll just note
16 that maybe you kind of hear worries about rules weakening or
17 too many materials getting on the list. The bar remains
18 very high. We had a lot of discussion about this, want to
19 look for opportunities to grow the organic marketplace, but
20 it's pretty hard to get a new material on the list. I think
21 this proposal is reflective of that.

22 CHAIR SMITH: Sorry. My job now. I see no
23 other comments or questions, so we will move to the vote.
24 We have four votes, so we'll first do the classification
25 vote on magnesium carbonate. So this motion comes to the

1 Board from subcommittee to classify magnesium carbonate as a
2 nonagricultural synthetic. It was motioned by Nate and
3 seconded by myself. And we will start the vote with
4 Franklin.

5 BOARD MEMBER QUARCOO: Yes.

6 CHAIR SMITH: Nate Lewis?

7 SECRETARY LEWIS: Yes.

8 CHAIR SMITH: Allison?

9 BOARD MEMBER JOHNSON: Yes.

10 CHAIR SMITH: Brian?

11 BOARD MEMBER CALDWELL: Yes.

12 CHAIR SMITH: Jerry?

13 BOARD MEMBER D'AMORE: Yes.

14 CHAIR SMITH: Carolyn?

15 BOARD MEMBER DIMITRI: Yes.

16 CHAIR SMITH: Wood?

17 BOARD MEMBER TURNER: Yes.

18 CHAIR SMITH: Mindee?

19 BOARD MEMBER JEFFERY: Yes.

20 CHAIR SMITH: Logan?

21 BOARD MEMBER PETREY: (No audible response.)

22 CHAIR SMITH: Didn't hear you, Logan.

23 BOARD MEMBER PETREY: Yes.

24 CHAIR SMITH: Thank you. Amy?

25 VICE CHAIR BRUCH: Yes.

1 CHAIR SMITH: Kim?

2 BOARD MEMBER HUSEMAN: Yes.

3 CHAIR SMITH: Nate Powell-Palm?

4 BOARD MEMBER POWELL-PALM: Yes.

5 CHAIR SMITH: Dilip?

6 BOARD MEMBER NANDWANI: Yes.

7 CHAIR SMITH: Chair votes yes.

8 SECRETARY LEWIS: Fourteen yes, one absent.

9 The motion passes.

10 CHAIR SMITH: Great. We will now go to the
11 listing motion for magnesium carbonate. So the motion comes
12 from the subcommittee to the full Board, motion to add
13 magnesium carbonate for use only as an anticaking agent in
14 chicory powder, 205.605(b). It was motioned by myself and
15 seconded by Nate Lewis.

16 And then, Nate, you will start the vote.

17 SECRETARY LEWIS: No.

18 CHAIR SMITH: Allison?

19 BOARD MEMBER JOHNSON: No.

20 CHAIR SMITH: Brian?

21 BOARD MEMBER CALDWELL: No.

22 CHAIR SMITH: Jerry?

23 BOARD MEMBER D'AMORE: No.

24 CHAIR SMITH: Carolyn?

25 BOARD MEMBER DIMITRI: No.

1 CHAIR SMITH: Wood?

2 BOARD MEMBER TURNER: No.

3 CHAIR SMITH: Mindee?

4 BOARD MEMBER JEFFERY: No.

5 CHAIR SMITH: Logan?

6 BOARD MEMBER PETREY: No.

7 CHAIR SMITH: Amy?

8 VICE CHAIR BRUCH: No.

9 CHAIR SMITH: Kim?

10 BOARD MEMBER HUSEMAN: No.

11 CHAIR SMITH: Nate Powell-Palm?

12 BOARD MEMBER POWELL-PALM: No.

13 CHAIR SMITH: Dilip?

14 BOARD MEMBER NANDWANI: No.

15 CHAIR SMITH: Franklin?

16 BOARD MEMBER QUARCOO: No.

17 CHAIR SMITH: Chair votes no.

18 SECRETARY LEWIS: Zero yes, fourteen no, one
19 absent. The motion fails.

20 CHAIR SMITH: We will now go to the
21 classification vote for magnesium carbonate hydroxide. The
22 motion comes from the subcommittee to the full Board. The
23 motion to classify magnesium carbonate hydroxide as
24 nonagricultural synthetic. It was motioned by Nate Lewis
25 and seconded by myself. The vote starts with Allison.

1 BOARD MEMBER JOHNSON: Yes.
2 CHAIR SMITH: Brian?
3 BOARD MEMBER CALDWELL: Yes.
4 CHAIR SMITH: Jerry?
5 BOARD MEMBER D'AMORE: Yes.
6 CHAIR SMITH: Carolyn?
7 BOARD MEMBER DIMITRI: Yes.
8 CHAIR SMITH: Wood?
9 BOARD MEMBER TURNER: Yes.
10 CHAIR SMITH: Mindee?
11 BOARD MEMBER JEFFERY: Yes.
12 CHAIR SMITH: Logan?
13 BOARD MEMBER PETREY: Yes.
14 CHAIR SMITH: Amy?
15 VICE CHAIR BRUCH: Yes.
16 CHAIR SMITH: Kim?
17 BOARD MEMBER HUSEMAN: Yes.
18 CHAIR SMITH: Nate Powell-Palm?
19 BOARD MEMBER POWELL-PALM: Yes.
20 CHAIR SMITH: Dilip?
21 BOARD MEMBER NANDWANI: Yes.
22 CHAIR SMITH: Franklin?
23 BOARD MEMBER QUARCOO: Yes.
24 CHAIR SMITH: Nate Lewis?
25 SECRETARY LEWIS: Yes.

1 CHAIR SMITH: Chair votes yes.

2 SECRETARY LEWIS: Fourteen yes, zero one, one
3 absent. The motion passes.

4 CHAIR SMITH: And lastly, the listing motion
5 for magnesium carbonate hydroxide. The motion comes from
6 the subcommittee to the full Board. Motion to add magnesium
7 carbonate hydroxide for use only as an anticaking agent in
8 chicory powder, 205.605(b). The motion was made by myself
9 and seconded by Nate. And the motion -- or, I'm sorry, the
10 vote will start with Brian.

11 BOARD MEMBER CALDWELL: No.

12 CHAIR SMITH: Jerry?

13 BOARD MEMBER D'AMORE: No.

14 CHAIR SMITH: Carolyn?

15 BOARD MEMBER DIMITRI: No.

16 CHAIR SMITH: Wood?

17 BOARD MEMBER TURNER: No.

18 CHAIR SMITH: Mindee?

19 BOARD MEMBER JEFFERY: No.

20 CHAIR SMITH: Logan?

21 BOARD MEMBER PETREY: No.

22 CHAIR SMITH: Amy?

23 VICE CHAIR BRUCH: No.

24 CHAIR SMITH: Kim?

25 BOARD MEMBER HUSEMAN: No.

1 CHAIR SMITH: Nate Powell-Palm?

2 BOARD MEMBER POWELL-PALM: No.

3 CHAIR SMITH: Dilip?

4 BOARD MEMBER NANDWANI: No.

5 CHAIR SMITH: Franklin?

6 BOARD MEMBER QUARCOO: No.

7 CHAIR SMITH: Nate Lewis?

8 SECRETARY LEWIS: No.

9 CHAIR SMITH: Allison?

10 BOARD MEMBER JOHNSON: No.

11 CHAIR SMITH: Chair votes no.

12 SECRETARY LEWIS: Zero yes, fourteen no, one
13 absent. The motion fails.

14 CHAIR SMITH: Look at us going back and forth
15 between four classification and listing motions, and nobody
16 messed up. I'm so proud of you all.

17 Back to you, Allison.

18 BOARD MEMBER JOHNSON: Thank you, Kyla.

19 All right. Moving right along to our next
20 petition substance, rye pollen extracts. Carolyn is going
21 to lead us on this discussion.

22 PROPOSAL: RYE POLLEN EXTRACTS - PETITIONED

23 BOARD MEMBER DIMITRI: Great. Thank you. I
24 will make this kind of short because it seems very
25 straightforward to us.

1 The petition was to -- for rye pollen extract,
2 which is extracted from rye pollen, and it creates a product
3 that would be used as sweetener syrup, like a vegan version
4 of honey.

5 The petitioner says that they are unable to
6 find high pollen rye breeder seeds in organic form and,
7 therefore, wanted to be able to use conventional seed grown
8 conventionally -- grown under conventional methods. And the
9 TR pointed out very nicely, that actually under 205.204(a)
10 the producer would be allowed to use nonorganic untreated
11 seed to grow an organic crop as the basis for this rye
12 pollen extract. And the committee agreed with that.

13 And I just wanted to say, I always -- I
14 channeled my inner Kyla there, because I said some numbers
15 that were related to the regulation which always is
16 impressive when people can pull that out -- but I read it
17 here.

18 So -- anyway, so the subcommittee agreed that
19 this should not be added to the national list for that
20 reason.

21 CHAIR SMITH: Excellent. Thank you, Carolyn,
22 and good use of numbers. Appreciate it.

23 BOARD MEMBER DIMITRI: Thank you.

24 CHAIR SMITH: Any discussion, questions for
25 Carolyn? Sounds like a market opportunity out there for

1 someone.

2 Very proud of you for using your numbers
3 correctly, Carolyn. Love a good regulatory reference.

4 I don't see any comments or questions, so we
5 will move to the vote. So, again, we will do the
6 classification vote first. So the motion came from the
7 Handling Subcommittee to the full Board, motion to classify
8 rye pollen extract as agricultural. It was motioned by
9 Carolyn and seconded by myself. And the vote starts with
10 Jerry.

11 BOARD MEMBER D'AMORE: Yes.

12 CHAIR SMITH: Carolyn?

13 BOARD MEMBER DIMITRI: Yes.

14 CHAIR SMITH: Wood?

15 BOARD MEMBER TURNER: Yes.

16 CHAIR SMITH: Mindee?

17 BOARD MEMBER JEFFERY: Yes.

18 CHAIR SMITH: Logan?

19 BOARD MEMBER PETREY: Yes.

20 CHAIR SMITH: Amy?

21 VICE CHAIR BRUCH: Yes.

22 CHAIR SMITH: Kim?

23 BOARD MEMBER HUSEMAN: Yes.

24 CHAIR SMITH: Nate Powell-Palm?

25 BOARD MEMBER POWELL-PALM: Yes.

1 CHAIR SMITH: Dilip?

2 BOARD MEMBER NANDWANI: Yes.

3 CHAIR SMITH: Franklin?

4 BOARD MEMBER QUARCOO: Yes.

5 CHAIR SMITH: Nate Lewis?

6 SECRETARY LEWIS: Yes.

7 CHAIR SMITH: Allison?

8 BOARD MEMBER JOHNSON: Yes.

9 CHAIR SMITH: Brian?

10 BOARD MEMBER CALDWELL: Yes.

11 CHAIR SMITH: Chair votes yes.

12 SECRETARY LEWIS: Fourteen yes, zero no, one
13 absent. The motion passes.

14 CHAIR SMITH: And to the listing motion, the
15 motion comes before a full Board from the subcommittee.
16 Motion to add rye pollen extract as petitioned at 205.606.
17 It was motioned by Carolyn and seconded by Jerry. And the
18 vote starts with Carolyn.

19 BOARD MEMBER DIMITRI: No.

20 CHAIR SMITH: Wood?

21 BOARD MEMBER TURNER: No.

22 CHAIR SMITH: Mindee?

23 BOARD MEMBER JEFFERY: No.

24 CHAIR SMITH: Logan?

25 BOARD MEMBER PETREY: No.

1 CHAIR SMITH: Amy?

2 VICE CHAIR BRUCH: No.

3 CHAIR SMITH: Kim?

4 BOARD MEMBER HUSEMAN: No.

5 CHAIR SMITH: Nate Powell-Palm?

6 BOARD MEMBER POWELL-PALM: No.

7 CHAIR SMITH: Dilip?

8 BOARD MEMBER NANDWANI: No.

9 CHAIR SMITH: Franklin?

10 BOARD MEMBER QUARCOO: No.

11 CHAIR SMITH: Nate Lewis?

12 SECRETARY LEWIS: No.

13 CHAIR SMITH: Allison?

14 BOARD MEMBER JOHNSON: No.

15 CHAIR SMITH: Brian?

16 BOARD MEMBER CALDWELL: No.

17 CHAIR SMITH: Jerry?

18 BOARD MEMBER D'AMORE: No.

19 CHAIR SMITH: Chair votes no.

20 SECRETARY LEWIS: Zero yes, fourteen no, one
21 absent. The motion fails.

22 CHAIR SMITH: Back to you, Allison.

23 BOARD MEMBER JOHNSON: Thanks so much. And
24 thank you, Kyla and Carolyn, for taking on these petitions.
25 It's a lot of work to go through the review and the write-

1 up, even when the outcome is relatively simple. So
2 appreciate the time you put into these.

3 All right. Next, moving right along to Sunset
4 reviews. So we're going to go through a discussion of 20-
5 some-odd materials. We'll break somewhere in the middle for
6 lunch, unless we're lightning fast. So we will -- and just,
7 again, as a reminder, I'm going to be going in a different
8 order than is in the printed materials packet. So you might
9 have to jump around, but everything is there.

10 And we'll kick it off with acids, citric and
11 lactic with Nate Lewis, who needs to find it in his binder.

12 2026 HANDLING SUNSET REVIEWS:

13 ACIDS (CITRIC AND LACTIC)

14 SECRETARY LEWIS: Bear with me, folks.
15 Counting isn't my specialty. So I'm trying to react here.

16 So I had both lactic and citric acids as part
17 of my Sunset duties. I'll start with citric, and then move
18 on to lactic with an opportunity for Board discussion in
19 between.

20 Citric acid is widely used in food processing.
21 It's an ingredient of chelant pH control flavoring
22 foundationally necessary and essential in organic
23 processing. It's used in baby foods, breakfast cereals,
24 frozen desserts, entrees, all sorts of things. It's
25 generally internationally accepted with our trading

1 partners. We don't have any new information to suggest that
2 citric acid should be removed from the national list.

3 We did ask a question to stakeholders and
4 public commenters about whether Sunset is the appropriate
5 time or if it is the appropriate time now for NOSB to
6 consider a commercial availability annotation for the
7 substance. And we kind of got mixed reviews on that. I
8 think folks who sort of support the concept of commercial
9 availability, I -- we heard being applied to 605 items, we
10 heard them say that Sunset may not be the right time to do
11 that, and the petition process is the best time.

12 So just between the public comments that both
13 indicate it's essential and, perhaps, that there isn't quite
14 the volume or availability of the product right now, and
15 wanting to be really cautious about how we use our Sunset
16 time to not get overloaded with too many annotation
17 considerations.

18 I think my personal recommendation to the
19 Board is to not pursue that, but I would appreciate other
20 thoughts on that particular topic as we move into
21 discussion.

22 The other facet of citric acid for this Sunset
23 review is we did request a limited scope TR. And we
24 received that and we utilized some of the questions that
25 were included on yesterday's TR template update as a -- for

1 this limited scope, TR as a sort of a pilot to evaluate how
2 those -- how we -- just exactly what kind of information we
3 would receive by asking a few more questions on excluded
4 methods and manufacturing processes.

5 It was, I think, actually a perfect example of
6 how those additional questions can make our reviews more
7 effective. In summary, it sort of indicated that while
8 there are forms of GMO bacteria that could be used to
9 generate citric acid, those are all in experimental phase,
10 and the processes right now with *Aspergillus niger* to create
11 citric acid in a fermentation setting are so well-developed
12 that right now there's no real commercial drive to include
13 GMO bugs in that fermentation process.

14 So whether or not that changes in the future,
15 you know, we don't have a crystal ball, and that's not what
16 we're expecting of the TRs, but it is a helpful snapshot
17 into the current state. And so certifiers now have more
18 information to evaluate excluded methods, prohibition on
19 citric acid specifically.

20 So I think in this particular example, those
21 additional questions really shed some light on the current
22 status of that particular concern.

23 So I think with that, I'll open it up to
24 comments. And I'd be welcome to answer any questions or
25 discussion on TR template or commercial availability.

1 CHAIR SMITH: Thanks, Nate. Great overview.
2 Any questions or discussion on these
3 materials? Mindee?

4 BOARD MEMBER JEFFERY: I just wanted to
5 express my appreciation for how you went back cross-
6 collaborating in the subcommittees and looking towards the
7 work of what this particular substance could do to inform
8 the work of the TR template. And I just think it's really
9 important that we just honor and acknowledge the collective
10 intelligence of this Board and how fun it is to really get
11 it right when you, like, think really big and work across
12 all subcommittees and sort of plan ahead and strategize how
13 we can make sure we get it right. So appreciate the work
14 there.

15 CHAIR SMITH: Any other comments or questions?
16 All right. Great. Thank you.
17 Next up we have -- oh, sorry. Just go ahead,
18 lactic acid.

19 SECRETARY LEWIS: Oh, yeah, I was just going
20 to move on to lactic acid. Again, lactic acid is a widely
21 used ingredient in pretty much every segment of the food
22 industry. It's used in sugar, confectionary, and bakery
23 products; increases better stability in volume; increases --
24 or produces a mild and pleasant taste in acid pickles, so
25 it's a really important thing for me, in particular.

1 Anyway, it is widely used. It's used for pH adjustments in
2 brewed beverages. Again, widely allowed in all of our
3 trading partners' respective approaches to organic
4 certification and organic food products; no serious human
5 health or environmental issues were identified; and the
6 subcommittee did not really identify any rationale for
7 removing it from the national list. It remains essential,
8 and we did not have any questions to stakeholders.

9 CHAIR SMITH: Great. Thanks, Nate.

10 This is one of these weird ones where it's two
11 materials, sort of - not exactly the same under one line
12 item, but separate items for review. So any comments,
13 discussion, questions? Great.

14 2026 HANDLING SUNSET REVIEWS: CALCIUM CITRATE,
15 POTASSIUM CITRATE, AND SODIUM CITRATE

16 CHAIR SMITH: Okay. Now, for real, moving on
17 to some citrates. We have calcium citrate, potassium
18 citrate, and sodium citrate, with Carolyn.

19 BOARD MEMBER DIMITRI: Great. Thank you.

20 Well, these three citrates are all derived
21 from citric acid, and they have different purposes, but
22 generally, buffering and emulsifying, pH control, flavoring
23 agents. Along with other functions in calcium citrate also
24 can be calcium in supplements and is used in baked goods.

25 So, in general, there were not that many

1 comments. And the comments that there were on these
2 projects largely supported relisting. And I think the
3 committee so saw reason to remove these products from the
4 list.

5 I do kind of want to circle back to Nate for
6 one second. I seem to recall like an OMRI comment to one of
7 these ingredients with some reference to the TR template
8 adjustments. Do you remember seeing that? I just kind of
9 wanted to acknowledge that it existed.

10 SECRETARY LEWIS: I think you're right.

11 BOARD MEMBER DIMITRI: Yeah.

12 SECRETARY LEWIS: It exists.

13 BOARD MEMBER DIMITRI: Right. And I think it
14 was like not -- I know we already voted on the TR template,
15 so I just -- I guess I wanted to bring it out that OMRI
16 was -- had some concerns about what we proposed.

17 Anyway, I have -- any comments, questions,
18 thoughts?

19 CHAIR SMITH: Looks like we're good on these
20 ones. Thank you, Carolyn.

21 BOARD MEMBER DIMITRI: Thank you.

22 CHAIR SMITH: And speaking of the TR template
23 and complicated things related to excluded methods, next up
24 we have enzymes, microorganisms, and yeast with Jerry. And
25 I know Jerry really wrestled with these materials, and put

1 in a huge amount of work and thinking about what to do with
2 the new information that we have coming in, similar to Nate
3 and Carolyn on the previous material.

4 So kick it over to you with gratitude.

5 HANDLING SUNSET REVIEWS: ENZYMES,

6 MICROORGANISMS, YEAST

7 BOARD MEMBER D'AMORE: And thank you for that.

8 I think one of the other things is I did a lot of learning.
9 This was not designed to be done by a rookie or somebody
10 that wasn't thoroughly grounded in certification, in my
11 mind.

12 But here it is. The way I want to do this is
13 to refer and start back with the TR and talk to all three of
14 these substances, and then give a quick individual look at
15 them again individually.

16 The first thing I'd like to note, and I don't
17 know the significance of it, but these three substances
18 collectively have or -- and formed by 14 independent tabs,
19 or TRs. And they are also then underpinned by the most
20 recent 2023 limited scope TR. So I'm going to present three
21 distinct sections to this. The first is titled, "The 2023
22 Limited Scope TR," and it -- for me, titled what we asked
23 for.

24 Number two, a single document summarizing the
25 three Sunsets titled -- again, for me, Sunsets NATR, and

1 then, followed up by a very brief summary of stakeholder
2 comments for the spring session.

3 So enzymes, microorganisms, and yeast, the
4 limited scope technical report provided updated information
5 for the National Organic Standards Board in support of the
6 Sunset reviews of the following substances: enzymes,
7 microorganisms, and yeast. I won't read what it says beyond
8 that for these three, because I covered that in the
9 individual ones.

10 Enzymes and yeast are both included on the
11 national list of allowed and prohibited substances --
12 hereafter referred to as the national list. The first
13 publication of the National Organic Program Rule 65 FR --
14 forget it -- bacteria derived from -- excuse me -- it's not
15 to be dismissive -- so -- but anyway, going back to 1995,
16 fungal derived from NOSB 1996 plant derived NOSB 1996 D
17 animal derived enzymes were covered in separate technical
18 reports. Microorganisms were added to the national list
19 effective September 12, 2006.

20 The annotation for yeast was later reformatted
21 to condense separate lines into a single entry, but
22 otherwise, the change did not affect the meaning or
23 language. The listings for enzymes and yeast were
24 reformatted without any changes to the annotation.

25 Finally, the national list entry for yeast was

1 updated to include the current annotation, which includes a
2 clause requiring organic yeast and less commercially
3 unavailable.

4 I'm four and a half years into this job and to
5 have something emphatically say it must have, and then say,
6 with unless, is, for me, too easy a transition. This
7 technical report focuses on the fermentation process used to
8 create these substances, with specific attention given to
9 the use of excluded methods and their development and
10 manufacture. However, it is not practical to evaluate the
11 fermentation process and the potential use allowed in
12 excluded methods for every enzyme, microorganism, and yeast
13 product on the market within one technical report.

14 Instead, we provided an overview of the
15 fermentation process and possible ways both allowed and
16 excluded methods are used to reduce these materials, with
17 example and considerations.

18 An example list of manufacturers and brand
19 names for enzymes, microorganisms, and yeasts is included in
20 Table 4, within the appendix of this report. Furthermore,
21 the list of enzymes, their uses, CSRNs, and EC
22 identification numbers are included in Table 5.

23 The request for this technical report included
24 an excluded method -- excuse me. Let me start again.

25 The request for this technical report included

1 a list of excluded methods based on the current NOSB
2 recommendations which are defined in the definitions of CFR
3 205.2. Current NOSB recommendations also refer to some
4 technologies that were not considered prior to the
5 publication of the NOP final rule in 2022.

6 Both the technologies considered in the NOSB's
7 original recommendation, and those in the current
8 recommendations, are collectively referred to as excluded
9 methods. Most of the methods considered by the NOSB in 2022
10 recommend -- recommendation applied to plants and animals
11 that reproduce sexually. The TR also includes examples of
12 microorganisms produced with conjugation, which is mentioned
13 in 205.2, as a nonexcluded method, and is, therefore, not
14 considered to be excluded from organic production and
15 handling.

16 Last paragraph for this portion of it -- and
17 for me, an important one. The TR provides examples of some
18 of the better-known uses and methods of production for
19 enzymes, microorganisms, and yeast, and offers explanations
20 as to why they are allowed, excluded, otherwise prohibited,
21 or required -- or require NOSB consideration for
22 classification.

23 A list of food use microorganisms and whether
24 excluded methods are used in their production are listed in
25 Table 6 within the appendix. This report gives a broad

1 overview of fermentation processes designed and certain
2 common elements involved in fermentation technology.

3 The examples provided illustrate specific
4 fermentation processes, and are not intended to cover all
5 possible processes used to make ingredients intended for use
6 in organic foods.

7 It is beyond the scope of this TR to provide a
8 comprehensive list of all products, every method by which
9 they are produced, and an exhaustive list of their uses, or
10 information about whether any specific product is currently
11 used in organic processing.

12 So that's what we asked for. It goes quite a
13 bit longer, and it -- it was, in its inception, as
14 mentioned, did concern me, and it concerned me in the stream
15 of traceability of excluded methods. And it made me take a
16 deep dive into what a certifier goes through, which I had
17 never done and which was highly necessary. And it took me
18 off of the cliff that would have said, oh, my God, how can I
19 even work with these? And showed me the path of currently
20 used of -- of affidavits and follow-up, and processes.

21 So we'll have more on that a little bit later.
22 I -- give me a second. I would now like to go to my second
23 piece of this. Again, titled, "Three Sunsets in a Limited
24 Scope TR." Okay. Again, microorganisms, nonsynthetic
25 allowed; enzymes, nonsynthetic allowed; yeast, also

1 nonsynthetic allowed. The limited scope TR, for
2 microorganisms, enzymes, and yeast limited to researching
3 fermentation processes used to derive these substances
4 indicate which products are derived using organisms
5 developed by excluded methods, in which products are derived
6 using organisms developed through allowed methods including,
7 but not limited to, those listed as methods allowed.

8 During the 16 January 2025 Handling
9 Subcommittee meeting, this TR was determined to be
10 sufficient as a document focused on excluded methods. A
11 personal note from me at the time was, I believe that the
12 value of this limited scope TR will go beyond its
13 contribution to the Sunset review process for these three
14 substances; and that it will eventually be used in a
15 comprehensive review of excluded methods for all national
16 list items produced using fermentation.

17 Microorganisms: Any food grade bacteria,
18 fungi, or other microorganism. Use: Used as an organic
19 handling. Includes bacteria, yeast, and viruses, and are
20 used to make many well-known products, such as yogurt, miso,
21 soy sauce, and saki. I'll stop there. Manufacturer:
22 Generally, a medium is inoculated with a sample of fermented
23 food to produce a starter culture.

24 The 2023 limited scope TR stated that there is
25 no direct evidence that microorganisms, other than yeast,

1 were produced by excluded methods, but these were cases in
2 which no methods were -- but there were cases in which no
3 methods are disclosed.

4 National acceptance: No red flags anywhere.
5 Ancillary substances: Ancillary substances may be presented
6 in microorganism culture present in microorganism cultures,
7 and primarily include the growth media used to produce the
8 microorganism and the fillers or carriers to bring the
9 microorganism to purchases in a stable and predictable form.

10 Human health and environmental issues:
11 Microorganisms have been stable -- have been a staple in
12 food production for centuries, and they are generally viewed
13 as a necessary input. They pose minimal health risk and, in
14 many cases, can enhance health. Referring back to the
15 limited scope TR, it did -- and this was a driving
16 distinction -- I'm going to back up about this TR. I
17 started off by saying how many TRs and TAPs underpinned
18 these three things, and they were well done and they were, I
19 think, well considered.

20 What the 2023 TR did, it came on top of that,
21 endorsed everything behind it, and then went into excluded
22 methods. So that is, for me, the reason this '23 limited
23 scope TR is exceptional and, again, brings me to some of the
24 concerns that I have or that -- excuse me. Let me put it
25 this way -- some of the concerns that I initially had in

1 getting involved in this.

2 Discussion: In general, microorganisms are
3 essential to the production of many organic foods, and they
4 are widely used in the industry. I'm going to fast-forward
5 because we'll catch some of that later in the other two.
6 I'll go to yeast.

7 Yeast: A nonsynthetic allowed when used as a
8 food or fermentation agent in products labeled as organic.
9 Yeast may -- must be organic if it is -- if its end use is
10 for human consumption. And this is the part I like.
11 Nonorganic use may be used when organic yeast is not
12 commercially available. I just think there should be a
13 smoother transition.

14 Yeast is widely used and has been for
15 centuries. It is a microorganism that is commonly used for
16 fermentation in baking food flavors, adding nutritional
17 value and providing health benefits.

18 Manufacture: Yeast is typically grown in a
19 lab environment to prevent contamination from undesirable or
20 pathogenic organism. The lab-grown yeast is then used to
21 inoculate growth media for industrial production. I'm not
22 going to go through the whole thing. I'll just point out
23 that there -- that there is wide use of wild yeast, but in
24 terms of numbers -- but in terms of volume, for
25 consistency's sake, most of it is lab grown.

1 International acceptance: As before,
2 absolutely no red flags. In total harmony with our
3 partners. Ancillary substances: According to the 2014 TR,
4 there are few yeast species that are formulated with no
5 ancillary substances; however, many commercially available
6 yeasts are formulated with other ingredients.

7 Human health concerns and environmental
8 concerns: While yeast, itself, is often considered to be a
9 minimal risk to both environment and human health, there can
10 be negative environmental impacts from the manufacturing
11 process. Appropriate mitigation strategies exist. And when
12 properly used, minimize environmental impact.

13 The 2023 Limited Scope TR did not provide
14 additional information on the potential impacts to human
15 health or environmental issues. Basically, what they did,
16 they gave the seal of approval to what had been said before.

17 Discussion: Public comment from the -- from
18 spring 2019 meeting, a full Board meeting was overwhelmingly
19 in favor of relisting yeast as annotated. Commentators
20 noted that since yeast is commonly not available in organic
21 form, necessary for certain flavors, yeasts are not always
22 available in the quantities needed; and that organic yeast
23 quality can vary, i.e., asking for the annotation to stay as
24 it is.

25 Enzymes -- and this will be the last one.

1 It'll be much shorter because it follows lockstep with the
2 other two. Nonsynthetic allowed enzymes must be derived
3 from edible nontoxic plants, nonpathogenic fungi, or
4 nonpathogenic bacteria.

5 Enzymes are produced by all living organisms.
6 However, this report only focuses on enzymes produced by
7 microorganisms. Enzymes are commonly used in the production
8 of sweeteners, chocolate syrups, bakery products, alcoholic
9 beverages, et cetera.

10 Manufacture: According to the 2023 Limited
11 Scope TR, food grade enzymes are typically produced in pure
12 culture fermentation, using current good manufacturing
13 practices for food. International acceptance: Also in full
14 harmony with the international community. Ancillary
15 substances: A very long and detailed explanation given in
16 the 2026 Sunset Review of enzyme -- yes. Okay. Sunset
17 reviews of enzymes reflecting the various processes required
18 for their many uses.

19 Human health and other issues: The 2021 TR
20 did not find the manufacturer or use of enzymes to be
21 harmful to the environment or biodiversity.

22 That is that part. The last part is a ten-
23 second deal. For this particular comment period, we had a
24 total of 19 comments, both verbal and written; 16 -- this is
25 for microorganisms -- 16 were in favor of keeping the

1 microorganism on the national list. Some lengthy and very
2 thoughtful responses supporting that notion.

3 Enzymes, about 16 total comments, with the
4 majority being written, 15 were in favor of keeping enzymes
5 on the national list -- again, some good and thoughtful
6 responses. Yeast, 13 total comments, with the majority
7 being written. All were in favor of keeping the yeast on
8 the national list.

9 So I want to apologize to all of you, without
10 being able -- taking you through all of that, I would not be
11 in a position to be any good at answering questions. Thank
12 you.

13 BOARD MEMBER JOHNSON: Thanks so much, Jerry.
14 And I don't think I've ever heard anyone refer to you as a
15 rookie at anything, but --

16 BOARD MEMBER D'AMORE: In this arena, I'm a
17 rookie.

18 BOARD MEMBER JOHNSON: Well, really detailed,
19 and thanks for walking us through your thought process in
20 the background.

21 Questions, discussion? Wait. Where are we
22 pointing? Right. Yeah.

23 BOARD MEMBER CALDWELL: Thanks, Allison. And
24 thanks, Jerry. Jerry does a really wonderfully thorough and
25 thoughtful job on his reviews. When I first came on the

1 Board, he was saddled with copper, which was a massive,
2 massive undertaking, and really appreciate all that great
3 work, Jerry.

4 Just a thought about some of this. And I'm
5 hoping that Kyla can correct me if needed, because sometimes
6 when I get in the handling arena, I can get off track. But
7 it seems to me that in terms of enzymes, there is a
8 longstanding sort of precedent within the organic
9 certification and processing realm, and that is with
10 cheeses, I believe that for a long time there have been GMO
11 enzymes that have been excluded from use in organic cheeses.

12 Am I right about that? Okay. Just kind of
13 wanted to put that out there as kind of an example of
14 something that is in place, has been for many years --
15 trying to deal with, again, these very difficult issues.
16 But put that out there. So I'm glad I was right this time.
17 That's nice.

18 Thank you, Kyla.

19 BOARD MEMBER JOHNSON: Thanks, Brian. It's a
20 good concrete example to bring some context. Other
21 questions, discussion? Kyla?

22 CHAIR SMITH: Yeah. I just want to
23 acknowledge just some of the comments that we got in general
24 around fermentation. And I think it's maybe a twofold issue
25 that we might want to talk about, and that is related to

1 classification. And then, also some questions related to
2 excluded methods.

3 So I do know also that in some of the written
4 public comments, that the ACA best practices were submitted.
5 So I encourage first -- on the way home on the plane, some
6 light reading to familiarize yourself with the ACA best
7 practices on this. They do, you know, refer to the use of
8 affidavits, and that the language on the affidavit should
9 encompass the entire manufacturing process of the material,
10 including the source organism, such that the products
11 produced from fermentation by a GMO organism are evaluated
12 and prohibited, even if the final product does not contain
13 genetically modified material. So I'm just reading from the
14 best practice. And there is a template document that can be
15 utilized by certifiers to collect that information.

16 So -- I don't know. I just wanted to point
17 that out. And I do know that we sort of talk about how far
18 back. And so I think we can explore that a little bit more.
19 And then, also, just when do we -- when does the decision
20 tree start? And that is getting at the classification
21 piece. So I think we can try to unpack that a little bit,
22 more just to make sure.

23 I think certifiers are generally on the same
24 page, but just to make sure we're on the same page; and that
25 also the rest of the community and the stakeholders are sort

1 of aware of what's going on in material review.

2 BOARD MEMBER D'AMORE: Thank you for that,
3 Kyla. The question of how far back was one of the ones that
4 teased me the most. And at the risk of now saying too much
5 again, I -- and having a real affinity for the consumer side
6 of what we all represent, I will give you a quick anecdotal,
7 and it's for a reason.

8 I was at a dinner party with a few good people
9 and, you know, "What do you do?" And the whole -- this
10 whole topic actually came up about excluded methods and the
11 efficacy of what we then pass along as okay. And the
12 example was given of Nate's citric acid and the -- it was
13 further explained that as the product arrives here from
14 wherever it's coming, that we do not have the technology
15 available to slice and dice what you have right in front of
16 you, and complete that whole backwards process; that you've
17 truly don't know at that point what the first step could
18 have been.

19 So that's where the affidavits come in.
20 That's where I derive my certain sense of comfort. But I
21 would like to give you the comment -- and this is for
22 another time, this is not for now, but it's apropos to, I
23 think, a lot of what we're going to -- you all are going to
24 be going through in the next couple of years -- is PhD
25 biologist looked at me and said, "Well, if the best that we

1 have cannot tell you where the heck it came from, why should
2 we care?" I want you to ponder that question, because to me
3 that becomes a big question.

4 Why do we care? We do. We're diligent. And
5 I am happy or -- I'm quite okay with passing along this to
6 this subcommittee or to this full Board saying, this
7 doubting Thomas, not very well schooled in what we all do,
8 in terms of certification, et cetera, did end a long and
9 arduous process feeling quite okay with what we do. Thank
10 you.

11 BOARD MEMBER JOHNSON: Thanks, Jerry.

12 Any other discussion or questions? All right.
13 And I'll just mention, you'll notice that we're kind of
14 batching or grouping some of these materials, for several
15 reasons, one is survival and handling with these long, long
16 lists. We've got to get through them. But more
17 importantly, we're looking for ways to make Board service
18 accessible, achievable for lots of different people. So
19 trying to find ways to make this review process efficient
20 and as easy to understand as possible is, I think, achieved
21 by having these groupings. And then, we actually get kind
22 of better context when we think about them together, how
23 they relate, what the alternatives are.

24 So that's a transition to the next couple of
25 materials that Wood's going to take on. We've got hydrogen

1 peroxide and peracetic acid. We've heard about these in
2 other committees. This is the handling version. Take it
3 away.

4 2026 HANDING SUNSET REVIEWS: HYDROGEN PEROXIDE,
5 PERACETIC ACID/PEROXYACETIC ACID

6 BOARD MEMBER TURNER: Yup. And I think I can
7 contribute to the efficiency goal in these two reviews. I
8 know I'm following Jerry, I need to make up some time.

9 So we heard Franklin in livestock talk about
10 hydrogen peroxide. Did a great job. Very thorough
11 presentation of the science behind hydrogen peroxide.
12 It's -- quite honestly, this is a sanitizer in the toolkit
13 that's really a slam dunk. As long as it's used in --
14 consistent with regulations, EPA, USDA, and FDA labels and
15 regulations, it does not cause -- should not cause any
16 issues. It's got good consistency across international
17 frameworks, as well. Along with those facts, it's -- we
18 also heard from 13 folks -- 13 commenters in the public
19 comments, all of which supported this. This is across all
20 of our different stakeholder entities, trade associations,
21 growers, handle -- certifiers, NGOs, CPGs, the whole nine
22 yards.

23 I did think it was important to flag that one
24 certifier did say, you know, this is an important -- being
25 able to continue to use things like hydrogen peroxide in --

1 for -- as a sanitizer, does continue to provide an
2 alternative to quaternary ammonium compounds quats, which I
3 know concerns all of us. So very comfortable with the
4 feedback we got from the community on this particular
5 material. That's it.

6 CHAIR SMITH: Thanks, Wood. Any questions or
7 comments?

8 BOARD MEMBER TURNER: Moving along.

9 CHAIR SMITH: Moving right along. Thank you.

10 BOARD MEMBER TURNER: Moving right along.
11 Peracetic acid and peroxyacetic acid. 605(b), synthetic
12 allowed. Similar story here. And, by the way, I should
13 have said in the hydrogen peroxide, there's a TR from 2015
14 for hydrogen peroxide, and a TR from 2016 for peracetic acid
15 and peroxyacetic acid. You know, just as a flag to, you
16 know, those of you who are newer on the Board, you know, we
17 do have this continued issue of really feeling the need from
18 the community to assess and understand the sanitizer
19 landscape that we all operate within, and the essentiality
20 of some of these materials and, sort of, maintaining the
21 viability of organic products.

22 And so we're still, I would say, stalled as a
23 Board, in terms of sort of what that step should be -- what
24 that next step should be. But I would suggest to maybe some
25 of you who are behind me on the Board that, you know, the

1 fact that we've got a 2015 and a 2016 TR for these
2 sanitizers might be a flag to just be able to say, hey,
3 maybe this is the time that we lean into this. So I just
4 want to put that out there for folks to suggest that maybe
5 there's an agenda item here to kind of move this forward --
6 move the sanitizer discussion forward, because it is -- it
7 does continue to be something that the community says, hey,
8 there's got to be a unique way to evaluate the sanitizer
9 toolkit.

10 That being said, I think if we didn't have
11 peracetic acid and peroxyacetic acid, we probably would not
12 have organic. So there's -- we had 17 written comments from
13 the same breadth of the community that we had for hydrogen
14 peroxide, strong support for this material, strong support
15 for it. I really do appreciate, by the way, when we get
16 feedback from the community, that when organizations talk
17 about things very specifically, about how they're using --
18 how they use these materials, it just adds color. I just
19 love that kind of -- I love those kinds of public comments,
20 you know.

21 One commenter talked about how critical
22 peracetic acid is to CIP equipment -- to the CIP process,
23 the clean-in-place process for the equipment they've
24 invested in, to be able to do what they do. So, you know,
25 these are important things to sort of flag for us, because

1 in the end of this -- end of the day, even though it's
2 outside of our purview to think about the economics here,
3 it's all economic. So I think that's what I'll say about
4 that material and leave it at that.

5 BOARD MEMBER JOHNSON: Thanks, Wood. Kyla?

6 CHAIR SMITH: Yeah. Just in regard -- not
7 specific to PAA really, but just in the broader topic of
8 sanitizers, I know that we hear from stakeholders around
9 wanting like this comprehensive review. And so, perhaps we
10 can have our support staff try to get some of that
11 information for us to help us start to frame that out on
12 what that looks like. And it's -- I'm a little unclear of
13 like, then what? Right, I think. So we need these
14 sanitizers. Clearly, we've heard that having multiple
15 different types of sanitizers to be able to use in a
16 rotation is helpful. And so, I guess I just don't know like
17 what the next step is. We like get all this information,
18 and then, what? But I think at least we'll have that as a
19 starting point, and then maybe we can try to figure it out.
20 But, yeah.

21 BOARD MEMBER TURNER: Yes.

22 CHAIR SMITH: I just feel like -- I'm not sure
23 what we do with that information.

24 BOARD MEMBER TURNER: Exactly. Well said.
25 Yeah. I don't know either.

1 BOARD MEMBER JOHNSON: Thank you. Any other
2 questions or comments?

3 All right. Moving on to what I was promised
4 might be a lively one -- celery powder. This is what again?

5 2026 HANDLING SUNSET REVIEWS: CELERY POWDER

6 BOARD MEMBER TURNER: So, yeah. For every
7 slam did you think, there's always the one that comes behind
8 that, and that's celery powder. This is a 606 -- this is
9 listed at 606, nonorganic agriculturals allowed. This is
10 just -- you know, this was added to the list in 2007 via
11 petition, largely as a means of providing a means of curing
12 meats -- curing organic meats. But the supply and the means
13 of doing that via organic celery powder has not has not been
14 there over these years. So the material continues to be --
15 continues to be kept on the list, and so -- and continues to
16 be a source of great controversy. I think it's something
17 that we've -- we all acknowledge.

18 You know, it lives -- it's camped out on the
19 research priorities. Right? And it was heartening to hear
20 Erin Silva talking in the public comment about research
21 that's going on to -- that's -- I would hope has come out of
22 those priorities to be able to fund. I believe she referred
23 to an RAI \$2 million grant that's helping support
24 understanding what those alternatives might be, whether --
25 how to get organic sources of celery powder or other

1 alternatives that could actually meet the consumers'
2 interest in cured meats that don't use artificial nitrates
3 and nitrates.

4 The issue that does come up -- and you all
5 have read the comments -- the issue that has come up is
6 that, even with the lack of using artificial nitrates and
7 nitrates, we're still producing a nitrate -- that using
8 celery powder. And so it does concern stakeholders in the
9 community about this material. I mean, we've got, you know,
10 feedback from a retailer, feedback from NGOs, feedback from
11 a coalition, all of whom just, you know, probably by and
12 large, support the fact that we've got this -- we've had
13 this research priority and have this research in motion, but
14 still say it's got to go. And I think that's a fair point.
15 And I'm glad to see the research happening at the same time.
16 There are users across the organic community of the
17 material. We've got certifiers and organic businesses,
18 consultants, others who've all spoken in support of the
19 material. I mean, I think one product manufacturer talked
20 about 25 percent of their products containing it --
21 containing this material to be able to provide, you know,
22 what the consumer is asking for.

23 So it's super complicated and not something
24 that I sort of feel great about the situation we're in, but
25 I'm just -- I'll just say I feel -- I'd like to know and I

1 would, in this next semester, just want to make sure I'm
2 understanding that piece of research and the timing -- the
3 timing of it, and sort of when we could expect to see
4 something that could transform it. Is it conceivable that
5 if we keep it on the list today, could we -- is it
6 conceivable that it's gone in the next cycle?

7 So I'll leave it at that for now, and see if
8 there's anybody who wants to, kind of, join me in this
9 lovely conversation.

10 BOARD MEMBER JOHNSON: Oh, there are. Thank
11 you. I appreciate you laying out the framework and feedback
12 we got so far. I saw Logan, and then Nate. And I'm keeping
13 a queue.

14 BOARD MEMBER PETREY: Thank you. Okay. So
15 about the nitrates. I'm just curious. So if you'd say, you
16 need to eat beets; they're very good for you. They have
17 nitrates in it. And then it's, you know, you don't need to
18 eat bacon because they have nitrates in them. So having
19 nitrates in our diet, I guess, in some ways is good, and in
20 some ways, I guess, can be bad. I don't really understand
21 that very well.

22 I did read somewhere it's recommended that you
23 eat -- take in vitamin C with the nitrates. It helps maybe
24 reduce some kind of conversion. I don't know biochemically
25 what that would be. However, I did read that vitamin C was

1 important in that, and a lot of fruits and vegetables have
2 the vitamin C component.

3 Do you know if celery powder has that vitamin
4 C? I would imagine it would, you know, over other sources
5 of curing products.

6 BOARD MEMBER TURNER: I would assume so, but I
7 don't know the answer to that, but it's a good question.

8 CHAIR SMITH: Thanks, Logan. Go ahead, Nate.

9 SECRETARY LEWIS: I think -- I'm trying to
10 assemble my thoughts here, but I, first and foremost, would
11 much rather have organic celery powder in my organic bacon
12 than conventional celery powder. So I think there's some
13 sort of consensus around that. And I really applaud the
14 work at UW Madison to sort of move that along. That's
15 really encouraging and just sort of a great example of the
16 whole process working in the way we would love to see it
17 work.

18 The other issue is just related to consumer
19 choice. And I get concerned about centering too much health
20 impacts of food choices in our decision-making. We have a
21 lot of unhealthy things that we certify as organic --
22 tobacco, alcohol, sugar. Right? So, you know, I -- these
23 are all things we need to weigh. I think for me on this
24 particular issue, what I get uncomfortable with is that you
25 can label bacon with celery powder as uncured. Right? And

1 so that's a bigger issue than organic has the tools
2 necessarily to pull on.

3 So I think that's what I'm kind of centering
4 in my thought pattern -- not that, you know, and again, I
5 realize it's somewhat tangential to the decision around
6 whether or not it should be -- continued to be on 606. I
7 think once we have enough organic celery powder, the Board
8 will never see it again, because we'll remove it from the
9 list and we'll have a bunch of uncured organic bacon with
10 organic celery powder, and we won't get to talk about
11 nitrates in food anymore. But maybe we should.

12 So I don't know if that helped anybody, but I
13 think that uncured piece and that labeling requirement is
14 what is of concern for me.

15 CHAIR SMITH: Thanks, Nate. Nate Powell-Palm,
16 and then I'll put myself in the queue.

17 BOARD MEMBER POWELL-PALM: I was going to
18 glibly say that this doesn't sound very complicated, Wood,
19 and then Nate just said that and just really threw me off
20 there. But I would stand by that, 606 seems like one of the
21 least complicated pieces to our process, that we need
22 certain tools, and it's a list of opportunity.

23 Entrepreneurs go out make it and make it
24 happen. And really, I would echo, I was grateful to hear
25 from Dr. Silva that we're getting closer. But if anybody's

1 interested in getting this off the list, it would be
2 figuring out how to help her, how to help everyone who's
3 interested in that get the work done and get this product
4 commercialized and available, and then let us know about it.
5 Petition it off with that data.

6 And then, in getting ahead of those steps, the
7 process is great as it is. Getting ahead of those steps
8 seems like it's a necessary.

9 BOARD MEMBER JOHNSON: Thanks, Nate. Carolyn,
10 go ahead.

11 BOARD MEMBER DIMITRI: So I don't think she
12 needs help. I think she's got a really good team going and
13 she's working with the industry, and I have a lot of
14 confidence in what she's doing.

15 So is -- what is the barrier actually to
16 using -- requiring organic celery powder at this point in
17 time? Is it not enough organic celery? It's too hard to
18 grow?

19 BOARD MEMBER TURNER: I think it's been an
20 organic supply of the material.

21 BOARD MEMBER JOHNSON: Wood, is your mic off?
22 Can you repeat what you said?

23 BOARD MEMBER TURNER: It's organic supply.

24 BOARD MEMBER DIMITRI: Okay. And then, I
25 probably should know the answer to this -- like, how do you

1 say, like, we want you to use organic, and then like when
2 does the -- is it where it is on the list? Like, how do you
3 move it to another spot, now that, say, the market is
4 changing? I know I should know the answer to that, but it's
5 very complicated.

6 BOARD MEMBER JOHNSON: Yeah, it's good to do a
7 quick reminder. So 606 materials are agricultural, and
8 there's a commercial availability clause. So with those
9 materials, we're looking for -- is there anything
10 particularly scary about it? And are we -- is the organic
11 supply there yet? So when we have a yes to that, that's a
12 good time to Sunset it, along with considering the other --
13 there are other elements Nate wants to amend.

14 SECRETARY LEWIS: Yeah. I just want to add
15 that, and if you make organic bacon, you have to look for an
16 organic celery powder first, before you're allowed to -- you
17 have to demonstrate commercial availability.

18 BOARD MEMBER JOHNSON: Yeah. Thank you. Good
19 point.

20 Okay. I saw Brian, and then Mindee, and then
21 me. Brian?

22 BOARD MEMBER CALDWELL: Yeah. Thanks for all
23 this. This is a complete revelation to me, the whole
24 discussion and the comments. As a person who likes bacon
25 and hot dogs, I was like really happy that I was able to get

1 uncured organic, you know, versions. And now I'm finding
2 really they are cured. They're just with this -- with, you
3 know, sort of, quote, unquote, natural source. And I just
4 was -- I was amazed because there is pretty clear negative
5 health impacts of highly processed meats like that, and
6 nitrites in particular.

7 And just another -- just putting that out
8 there that as a consumer, just -- wow. It just -- it's
9 going to change my habits a little bit, I think.

10 But one of the issues with producing organic
11 celery for this purpose, I believe Erin talked about
12 basically quality issues. And I think what they're looking
13 for is really high nitrate levels in the harvested crop.
14 And it's not easy to do that without dumping on the chemical
15 end. So, anyways -- but I think that's part of it, too. So
16 she's trying to figure that out.

17 I'm not a fan of, you know, of a lot of
18 nitrates in produce. So it's not super exciting to me to
19 have an organic source of this. But, anyways, I think
20 that's what's going on.

21 BOARD MEMBER JOHNSON: Thanks, Brian. Mindee?

22 BOARD MEMBER JEFFERY: As an entertaining data
23 point, Good Earth takes a lot of pride in saying no to our
24 customers, because there's times when we just can't do
25 something because it's not organic. And we -- this was one

1 of the times there was -- we knew there was going to be a
2 bacon shortage. We knew it was going to be bad. And we
3 really pulled the staff together and did a lot of education.

4 Like I was talking to cashiers about why we
5 don't have organic bacon. And like the whole meat
6 department and the whole grocery department, who normally
7 wouldn't answer all these questions, like I was ready for
8 this one. We didn't want to bring in a natural bacon. We
9 put up all the signs. I talked to everybody on the staff.
10 And I -- we did not win this one. It was a mutiny. Like,
11 the people with their coffee cups not able to get bacon.
12 They -- they wanted their bacon, you know. So I really want
13 to support the continued availability of organic bacon
14 because I have seen the mutiny.

15 BOARD MEMBER JOHNSON: I love that, Mindee.
16 Thank you.

17 I was going to share a similar story or
18 reflection that when we're thinking about what materials we
19 keep in and what products may allow to be available, the
20 question is what instead. So I remember when I was working
21 in certification, we had a -- basically, a sports drink come
22 in. It was organic sugar and a bunch of vitamins. And I
23 took it to my boss, and I was like, "This is kind of pushing
24 the limits of the vitamins" -- we'll talk about later today.
25 "We probably shouldn't certify it." And at the time he

1 said, "Well, that product's going to exist. Do you want it
2 to have organic sugar that isn't bleached and treated with
3 all these chemicals and produced with pesticides, or do you
4 want this product?"

5 And that really shifted the way that I think.
6 You know, consumers are going to want their bacon. Our
7 Easter bunny brought some organic jelly beans and organic
8 gummy bears this year. So there are products that are going
9 to exist in the marketplace and our job is to kind of weigh
10 where that line is. Maybe sometimes the answer is no,
11 organic just shouldn't exist at that, and maybe it's --
12 there's a little wiggle room.

13 BOARD MEMBER JEFFERY: Our choice was natural
14 or organic. So we were trying not to bring in a natural
15 product. Sorry if I didn't make that distinction.

16 BOARD MEMBER JOHNSON: Oh, thank you for
17 clarifying. Yeah. But -- yeah. So cured, uncured, it
18 raises a lot of questions.

19 And then the other point that came to mind, as
20 we're thinking about production of this high in nitrate
21 celery or chard -- it sounded like is the other option, does
22 someone want to petition a synthetic? Is -- maybe
23 there's -- this is a situation where the synthetic option
24 actually might be preferable. We wouldn't know unless that
25 was in front of us, but it raised that question for me.

1 So, yeah. Great to see the research agenda
2 coming together, hearing feedback on the research, and then,
3 giving us this chance to discuss it.

4 Nate?

5 BOARD MEMBER POWELL-PALM: I just want to pile
6 on to this baking question. We -- if we look back at
7 research priorities, have we wanted to see more organic pigs
8 being produced? And if we then say, actually, we don't want
9 the best part of the pig to really have a market. I just
10 want to get -- I want to get some clarity here, folks, where
11 we're going.

12 And so I think that that's -- I mean, it's
13 again a question of well, not letting perfect be the enemy
14 of the good. I want to see organic bacon. I would much --
15 I mean, if we think -- I'll talk about animal welfare
16 later -- if we think about conventional bacon versus organic
17 bacon, if there's a little bit of secret nitrates in the
18 organic bacon, I'm going to say that is a world I can deal
19 with, and it's going to be a world that is so much better
20 than the conventional alternative. And so if we see this as
21 a catalyst to keep the organic pig market growing, I'm a
22 fan.

23 BOARD MEMBER JOHNSON: And I was just quickly
24 trying to Google nitrate -- nitrite labeling rules. I think
25 you can't say no. So that would be something, if a consumer

1 was worried about the presence of nitrites, they'd be
2 looking for a label that said that they're not there. And
3 the absence of that label would probably mean that they are
4 in these products where they tend to be used.

5 Any other discussion on this one? This is a
6 really great and interesting one.

7 Okay. Sorry. Just consulting about
8 lunchtime. I think we're -- we are nearing our planned
9 12:15 lunch. I think we could probably get through calcium
10 chloride and then, maybe give me a wink if you think we can
11 do like ten minutes on L-malic, or if we should save it
12 until after lunch.

13 Okay. So over to Kyla for calcium chloride.

14 2026 HANDLING SUNSET REVIEWS:

15 CALCIUM CHLORIDE

16 CHAIR SMITH: Yes. Okay. Calcium chloride is
17 listed at 205.605(a), nonsynthetics allowed. We did request
18 a limited scope TR, which we received, I think, in January.
19 It was used in the write-up, but we did have some clarifying
20 questions. So we didn't -- we went back to the -- to the TR
21 writers to ask some more specifics around soda ash,
22 utilizing trona ore to produce calcium chloride. It was a
23 little bit confusing.

24 And so we got that information, and we did
25 deem the TR then to be sufficient, but it has not yet been

1 posted on the petition substances database, but my
2 understanding is that it will be soon. So just so you guys
3 are aware of that.

4 Calcium chloride is used in like so many ways.
5 It's one of those big, widely-used things. So it's used as
6 a firming agent, a flavor enhancer, a nutrient supplement,
7 pH control agent, processing aid stabilizer, thickener,
8 tenderizer, texturizer of meat. The Limited Scope TR was
9 focused on the manufacturing process. So, again, it is
10 currently listed on the nonsynthetics allowed part of the
11 605 -- just to make sure that that's real clear.

12 In the TR, it was identified that there are
13 three ways to produce this material from three different
14 sources and processes. The first is from natural brines.
15 The second is from a reaction of calcium hydroxide with
16 ammonium chloride. And this is commonly referred to as the
17 Solvay process. And in that section of the TR, and sort of
18 the starting point of that is soda ash, and then goes
19 through a chemical process.

20 Soda ash can also be produced in other ways
21 through chloralkali process or by utilizing trona ore. And
22 trona ore is pretty common in the US to get to soda ash.
23 However, the TR then in the revision clarified that the
24 chloralkali process and the soda ash from trona process do
25 not produce calcium chloride as a byproduct. So that was a

1 really important clarification.

2 And so this Solvay process is more readily
3 used in the EU, and it's not generally -- calcium chloride
4 is not generally produced from the Solvay process here in
5 the States.

6 And then the third way is through a reaction
7 of hydrochloric acid with calcium carbonate.

8 As far as the environmental concern, this is
9 another one of those materials where mining is the largest
10 environmental concern. It was noted in the TR that it's
11 unlikely to have negative health impacts. We did ask a
12 couple of stakeholder questions, mostly around commercial
13 availability of nonsynthetic processes. This is a
14 little -- those questions were before we got that
15 clarification around the processes that we did receive in
16 the revised TR. And then, we did ask certifiers what kind
17 of documentation they were obtaining from manufacturers to
18 verify that calcium chloride is, in fact, being produced via
19 a nonsynthetic process.

20 So we got about a dozen public comments. All
21 were in favor of relisting, or really didn't state an
22 opposition to relisting. Sometimes, you know, there's not a
23 clear response. Some commenters responded stating that
24 calcium chloride products currently being used are produced
25 using nonsynthetic processes. Certifiers confirmed that

1 this is verified through receipt of processing descriptions
2 and/or attestations from manufacturers. And then, two
3 commenters stated that we should investigate the presence of
4 calcium bromide and consider an annotation, as applicable.
5 And then, additionally, one commenter stated that since some
6 processes for manufacturing calcium chloride result in a
7 synthetic product, that it should be annotated to ensure
8 that nonsynthetic processes are being used.

9 I think this is redundant since, again, it's
10 on the nonsynthetics allowed list and the verification that
11 certifiers are doing seems adequate, based on their
12 responses. Thanks.

13 BOARD MEMBER JOHNSON: Thank you, Kyla. Trona
14 ash, it's a new vocab word for me in this one. All very
15 interesting.

16 Any discussion, questions? I've got a quicker
17 hand -- quick. Okay. Over to Nate for L-malic acid.

18 2026 HANDLING SUNSET REVIEWS: L-MALIC ACID

19 SECRETARY LEWIS: L-malic acid is listed at
20 205.605(a) as a nonsynthetic, which is the source of a lot
21 of the discussion we'll have today on the topic -- or on the
22 material. It's used as a flavor enhancer, flavoring agent,
23 pH control. And we heard from public commenters that it's
24 essential for organic winemaking -- allowed in our by our
25 trading partners and international standards. Pretty benign

1 to the environment and human health. So it did not have any
2 major concerns there.

3 Our biggest area of work as a subcommittee on
4 the substance is around its classification. Right now it is
5 approved at, as I mentioned, 605(a), which is a list of
6 nonsynthetics. It appears that much or most or all of the
7 L-malic acid that is used in food processing is, perhaps, in
8 fact, a synthetic substance. It is produced through a two-
9 step fermentation process where the starting material,
10 fumaric acid, is actually a synthetic substance itself. So
11 it -- so if you follow the classification guidance, if you
12 start with a synthetic substance, you can't go back to a
13 nonsynthetic substance. And that's really the -- even if
14 it's an enzyme or a microorganism that chews it up and turns
15 it into something else. And that really is the crux of the
16 issue here and whether or not it should be removed from
17 605(a) and added to 605(b), which is the synthetic
18 versions -- or the synthetic list of allowed additives to
19 organic food.

20 And I think there's a lot to unpack there. We
21 have we heard commenters on both sides, some folks who felt
22 like we should remove it from 605(a) and wait for a petition
23 to add it back to 605(b). We have heard that Board should,
24 in its Sunset work, add it to 605(b) and keep it on 605(a),
25 because there may be nonsynthetic versions available, and

1 that would be what folks should -- we would prefer, perhaps.

2 And so, I don't know what to do. And I don't
3 particularly have a recommendation on it. I will say,
4 though, that, personally, I am reticent to set policy in
5 classifications, especially based on individual material
6 Sunset reviews. I don't think that's a good avenue to make
7 broad-sweeping, precedent-setting decisions around
8 classification.

9 So I think the whole discussion around L-malic
10 acid, its classification and its role on the list
11 underscores, perhaps, the need to spend a little more time
12 on classification, particularly of fermentation products as
13 a whole. And within that body of work, identify what the
14 concerns are and which materials on the list might be
15 affected by it, and use a kind of comprehensive approach to
16 then adjust where things live on the national list to ensure
17 that there's consistency on classification decisions.

18 I recognize that synthetic or nonsynthetic,
19 when it comes to a process products formula does not really
20 enter into the calculation or the formula. I also recognize
21 there's consumer preference for less synthetics. That's not
22 really a requirement in our regulation, per se, as it comes
23 to product composition requirements.

24 The other thing is, I'll recognize that those
25 classifications of substances on 605(a) and (b) are actually

1 used to justify other classifications in crop production,
2 which does have a very dramatic impact on whether or not
3 something is allowed. So we need to approach all of these
4 classification decisions not in a Sunset vacuum, but rather
5 as a comprehensive approach.

6 And I'm happy to unpack any of that, if folks
7 have questions.

8 BOARD MEMBER JOHNSON: Thanks, Nate. This is
9 where your depth of expertise really shines. Appreciate you
10 walking us through that. Brian?

11 BOARD MEMBER CALDWELL: Well, I'm in my fourth
12 year on the Board, and I'm going to show gaping holes in my
13 understanding. But two things -- I think I knew this, but
14 I've forgotten why the listing for -- is it an organic
15 material or just a natural or nonsynthetic, but nonorganic?
16 Is that the issue?

17 Okay. So I got that one. I apologize for
18 taking time on that. But the question -- the second one is,
19 can we actually add something to the list that's not
20 petitioned?

21 SECRETARY LEWIS: Yeah, it was originally
22 petitioned. It was a petitioned substance. So -- is there
23 a petition? Is that the -- there's a petition to
24 reclassify?

25 UNIDENTIFIED SPEAKER: Yes.

1 BOARD MEMBER CALDWELL: Oh, there is?

2 UNIDENTIFIED SPEAKER: Yes.

3 BOARD MEMBER CALDWELL: Oh, okay. Thank you.

4 SECRETARY LEWIS: Thanks for the lifeline
5 there.

6 CHAIR SMITH: Call a friend. Yeah. There was
7 a -- it is currently still with the Handling Subcommittee.
8 So -- but, yes.

9 BOARD MEMBER JOHNSON: Okay. So sounds like
10 we could pick that up this summer, and that'll help maybe
11 make the path more clear -- ask us to take a path at least.

12 And, Brian, to your question and point, we
13 spent a lot of time trying to figure it out, and I'm not
14 sure how much it matters in handling, whether it's synthetic
15 or nonsynthetic, but that's the way the list is built, and
16 we want to get things in the right place when we can. And
17 there's no shortage of odd little errors or inconsistencies
18 on this list. And bit by bit, we're getting there.

19 Any other comments, questions? All right. So
20 to be continued on that one in particular. Kyla?

21 CHAIR SMITH: Oh, sorry. Yup. Oh, yeah, look
22 at us. Right at 12:15. We are so on it today.

23 Okay. Yeah. We will come back at 1:45.

24 LUNCH BREAK

25 CHAIR SMITH: Okay, everybody. Welcome back.

1 We're going to get started here. So if you guys could take
2 your seats, that would be great.

3 I do have an important announcement, as we are
4 taking our seats, for anybody who would like to know about
5 Oliver's descendants and where they are going to now reside.
6 They are happily in the care of Mark King, a former NOSB
7 member, who agreed to adopt them and care for them in an
8 organic setting in Indianapolis. They will not be flying,
9 and will -- and there is general relief about this news of
10 the NOSB mascots. So, thank you, Mark King, for giving
11 Oliver's descendants a home.

12 Back to Allison.

13 2026 HANDLING SUNSET REVIEWS:

14 MAGNESIUM SULFATE

15 BOARD MEMBER JOHNSON: It just reminded me of
16 something I meant to do yesterday. Oh, well. All right.
17 Back to the world of handling, where we don't have worms,
18 but we have fun things like magnesium sulfate, which is up
19 next. So I'm on magnesium sulfate. This is the third
20 time -- third time's the charm -- to talk about this
21 material at this meeting. We covered it in livestock and
22 crops, too.

23 In handling, it's used as a nutrient in salt
24 replacement products, dietary supplements, a variety of
25 drinks, and as a fermentation and malting aid in beer, which

1 there's plenty of in this wonderful city.

2
3 For handling, it's limited to nonsynthetic
4 sources only. So that means from salt deposits or rocks,
5 and it's isolated from open pit mines or salt ponds -- so a
6 bit of distinction from crops and livestock where it's
7 synthetic. The type and amount of hydration that you have
8 creates different crystalline structures, so it's usually
9 isolated under specific humidity and temperature conditions
10 to get the most useful forms. It's allowed as a food
11 additive under the Canadian organic standards, and not
12 addressed in the other international organic standards.

13 There are environmental impacts from mining,
14 although the TR noted that there's not a lot of information
15 specifically available for mining for this material. And I
16 think we mentioned earlier that we've asked our food
17 technologists to prepare some more background information on
18 mining to help us improve our depth of review and think
19 about how to approach this group of materials that are
20 mined.

21 There do appear to be some alternatives, but they
22 may change the properties of the finished product. So we
23 asked our stakeholders whether -- where the material is
24 currently being used, and whether there are adequate
25 alternatives. We got just a few comments about operations

1 that do use this material. It's noted to be used as a yeast
2 nutrient and a water adjuster. And we didn't receive any
3 information about alternatives.

4 Any questions or discussion? All right. Epsom
5 salts all around.

6 Okay. Moving on to Perlite and Kim.

7 2026 HANDLING SUNSET REVIEWS: PERLITE

8 BOARD MEMBER HUSEMAN: Thank you, Allison. I do
9 think that in the fall, I'm going to have to provide some
10 visuals for some of the materials we are talking about. So
11 I think I pointed at Brian and said, "Hey, I need my
12 sluggo." So that -- we're going to be able to talk about
13 some of these things as like not just the ingredient or just
14 like -- what are these actually used in? Okay. Off that
15 soapbox.

16 Let's talk about Perlite, another important
17 product for growing vegetables, if you're -- like your
18 potting soil, but this is not the intended use in this
19 particular spot. So Perlite, under 205.605, under
20 nonsynthetic allowed is used in handling for use only as a
21 filter aid in food processing. We did ask for an updated
22 TR, and it was, you know, mostly around just from a
23 manufacturing standpoint and getting an update on, just
24 overall, from the TAP there just was some limited data --
25 felt like that TR was sufficient. And moving forward, the

1 use for perlite as a filtering aid, the comments came mostly
2 from the wine and -- the wine segment.

3 You know, we've talked about mined products.
4 Perlite is another mined substance and is something that, as
5 our food technologists are reviewing, this will have some
6 implications from that perspective, too. Outside of that
7 aspect, looking at the public comments, we ended up with a
8 total of -- very few -- call it a handful of public
9 comments, all which supported the relisting and the
10 continuation of our organic wines.

11 That's all I've got. Any questions?

12 BOARD MEMBER JOHNSON: All right. Thanks so
13 much, Kim.

14 Next up we have potassium iodide with Logan.

15 2026 HANDLING SUNSET REVIEWS: POTASSIUM IODIDE

16 BOARD MEMBER PETREY: Okay. Can you hear me?
17 Hold on --

18 BOARD MEMBER JOHNSON: Sounds good.

19 BOARD MEMBER PETREY: Can you hear me?

20 BOARD MEMBER JOHNSON: Sounds good.

21 BOARD MEMBER PETREY: Okay. Great. All right.
22 Thank you. Potassium iodide, some history. It was
23 initially reviewed by NOSB 1995. Originally listed at both
24 205.605(a) and 205.605(b), but -- and I think it was in 2011
25 the Board said it was kind of a double listing because it

1 was in the vitamins and minerals listing. So they removed
2 it at 205.605(b).

3 Its use is a -- for dietary reasons. It's used
4 worldwide to fortify food, with the exception of marine
5 fish. And seaweed food generally does not provide enough
6 iodine for the dietary requirements. Many countries have
7 made efforts to increase iodide intake through
8 supplementation in salt, infant formula, and cooking oils,
9 and has nearly eliminated the severe iodine deficiency.

10 Manufacturing: Although nonsynthetic potassium
11 iodide is allowed in organic handling, most of the
12 commercially available is synthetic. Approximately half of
13 the synthetic is sourced from Chile. The remaining -- I
14 think it's from caliche deposits. I don't know what caliche
15 is -- but caliche deposits. Remaining is sourced from
16 brines. This is the US, Japan, Russia, Indonesia. There is
17 no evidence of any commercially significant potassium iodide
18 products available.

19 Internationally, it's accepted -- or it's listed
20 under Canadian standards, but it doesn't appear in any other
21 standards. The human health, there's -- I don't have human
22 health listed, you know, as far as a toxicity issue, but
23 more so on the deficiency. And that's why iodine is
24 fortified foods and is listed in the vitamins and minerals.
25 All comments were in favor of relisting, but commenter did

1 mention -- did state that we should have this back on as the
2 synthetic list -- the synthetic list.

3 BOARD MEMBER JOHNSON: Great. Thank you, Logan.
4 Thank you again.

5 BOARD MEMBER PETREY: Uh-huh.

6 BOARD MEMBER JOHNSON: I have a little feedback.
7 Any questions or comments?

8 Okay. Moving right along, pullulan -- pullulan.

9 2026 HANDLING SUNSET REVIEWS: PULLULAN

10 BOARD MEMBER NANDWANI: Pullulan. Right. Thank
11 you. Thanks, Allison.

12 Good afternoon. So pullulan for use in tablets
13 and capsules for dietary supplements, and it is 205.605(a),
14 nonagricultural, nonsynthetic allowed. And it's a technical
15 report available 2018. And subcommittee reviewed the
16 substance. According to FDA, pullulan is a product used for
17 tablet coating as an excipient to aid tableting processes in
18 the production of edible films, and as an alternative to
19 gelatin in capsule production.

20 In addition to the petitioned use of pullulan as
21 an ingredient in tablets and capsules for dietary
22 supplements, edible pullulan films are used to extend the
23 shelf life of various foods.

24 Manufacture: So it is created by microbial
25 fermentation. The microorganism is usually the black yeast-

1 like fungus. It's a mold, and it is called Aureobasidium
2 pullulans. There are other species also of this black
3 fungus. It's Aureobasidium fermentans, as well as A.
4 melanogenum. So there are three species listed.

5 International acceptance: It's not explicitly
6 mentioned in Canada or European, and IFORM, Japan.

7 Nonancillary substances: According to authority TR
8 available, there are no adverse effects known on human
9 health and environmental issues. Public comments: They
10 support relisting of pullulan. One stakeholder urges NOSB
11 to recommend applying the commercial availability clause to
12 the entirety of the substance on 205.605, including
13 pullulan.

14 We asked a question to our stakeholders: Does
15 pullulan have the potential to be produced agriculturally
16 and organically? And, if so, would a commercial
17 availability requirement have derived commercialization of
18 organic pullulan? And we heard on other day -- day one from
19 Gwendolyn, one of the stakeholders. She very well, you
20 know, explained about the use of pullulan. And she also
21 gave a little bit of background. So she stated that now the
22 organic option of pullulan is available, and the company is
23 manufacturing organic pullulan, but still it has to go
24 through still -- they are doing scale up the production.

25 That's all I have. Thank you.

1 BOARD MEMBER JOHNSON: Great. Thank you, Dilip.
2 Comments, questions?

3 I put this one in the happy category of maybe
4 next time as well. It sounds like there's good progress on
5 an organic option, but it's not quite at scale.

6 BOARD MEMBER NANDWANI: Okay.

7 BOARD MEMBER JOHNSON: All right. Thank you.

8 BOARD MEMBER NANDWANI: Thank you.

9 BOARD MEMBER JOHNSON: Next up is activated
10 charcoal. Kim?

11 2026 HANDLING SUNSET REVIEWS: ACTIVATED CHARCOAL

12 BOARD MEMBER HUSEMAN: Okay. Activated charcoal,
13 listed at 205.605(b), synthetics allowed. Activated
14 charcoal is also referenced for only from vegetable -- oh,
15 sorry -- vegetative sources and for use only as a filtering
16 aid in handling.

17 Activated charcoal is used in processing for
18 mechanical filtration involving the physical separation of
19 suspended solids from liquids passing through the carbon
20 arrayed as a porous media in a column or a bed. It's
21 another form of filtration -- I think we've also talked
22 about perlite as a form of filtration. Activated charcoal
23 from a vegetative origin can be made from a large variety of
24 different sources -- different hardwoods, grain hulls, corn
25 cobs, and nut shells, to name a few.

1 We did also receive a TR for the substance, too,
2 that was approved. And it was also in conjunction to having
3 an old TAP on file. We asked the question to stakeholders,
4 if there were any industry changes that could challenge the
5 current listing for activated charcoal. We didn't receive
6 any feedback from that particular question. We had
7 approximately seven -- I think eight total comments that
8 were in support of relisting. And some of those coming from
9 certifiers listing the number of operations that list it in
10 their number of operations that list it for use. That's all
11 I have.

12 BOARD MEMBER JOHNSON: Great. Questions for Kim?
13 All right. Thanks, Kim.

14 Next up is ascorbic acid with Nate.

15 2026 HANDLING SUNSET REVIEWS: ASCORBIC ACID

16 SECRETARY LEWIS: All right. Thank you, folks.
17 Let me get situated here. Ascorbic acid is listed at
18 205.605(b), also known as vitamin C. Has many important
19 biological functions in the human body. It's widely used in
20 feed, food, and pharmaceutical sectors, a nutritional
21 supplement, and preservative, making use of this
22 antioxidative properties.

23 We have heard that it's used in a protein
24 processing and cheese color stabilization and fruit juice,
25 and as an antioxidant and vitamin C source. And it's

1 important to note, as an ingredient, there is no problem
2 with this substance being used in that manner. The
3 nationalist criteria -- the nationalist criteria is
4 prohibition on preservatives and color. And functional
5 effects to recreate flavors and colors only applies to
6 adjuvants and processing aids. So as an ingredient, that's
7 a permissible use.

8 It's typically produced through a fermentation
9 product, but then goes through a final step that renders it
10 synthetic -- so yet another synthetic fermentation product.
11 So maybe adding a little more case to needing to add some
12 clarity to classification of fermentation materials.

13 Public commenters confirmed what they have stated
14 in the past, that it remains essential for organic
15 processing and is widely used. And beyond that, there's no
16 additional rationale for considering removal from the
17 national list.

18 BOARD MEMBER JOHNSON: Thanks, Nate. Questions,
19 comments?

20 Brian?

21 BOARD MEMBER CALDWELL: Thanks, Nate. It just
22 occurred to me that, of course, there's very likely going to
23 be a lot of pressure to produce vitamin C with excluded
24 methods. But the fact that there's a really big, strong
25 human use for it makes me optimistic that maybe livestock

1 sources of vitamin C will be preserved that will not be GMO
2 as well. So that's -- I hadn't thought of that until just
3 this moment. Seems like a good thing.

4 SECRETARY LEWIS: Yeah, agreed.

5 BOARD MEMBER JOHNSON: Thank you. All right.
6 Moving right along. Collagen Gel with Kim.

7 2026 HANDLING SUNSET REVIEWS: COLLAGEN GEL

8 BOARD MEMBER HUSEMAN: All right. Apparently, us
9 Americans like our bacon and we want our sausage, too. So
10 collagen gel, which is listed at 205.605(b), synthetic
11 allowed. Collagen gel is used as a casing. It may be only
12 used when organic collagen gel is not commercially
13 available. So here we are again with, yes, but. So
14 collagen gel acts as an edible film in meat products, such
15 as sausages, as an alternative to casings, which is
16 also -- which is listed at 205.606(b).

17 Collagen casings or collagen gel protects the
18 meat product from oxidation and discoloration by acting as a
19 semipermeable membrane for gases, moisture, and other
20 solvents. The casing also provides more desirable bite and
21 texture to meat products, as well as aids and additional
22 flavorings of the product. It can be more affordable,
23 efficient, and sanitary when also looking at other increased
24 opportunities to produce a larger variety of organic meat
25 products.

1 We have a debate through the manufacturing
2 process, collagen is a natural animal protein found in skin,
3 bones, muscle, and connective tissues that is isolated
4 mostly from bovine or porcine sources at USDA inspected
5 facilities. The animal-based collagen source is partially
6 hydrolyzed through enzymatic thermal or acid treatment from
7 meat processing byproducts to cleave the protein.

8 I was just -- took me back to my childhood when
9 we would go to the butcher shop and get our package of
10 casings to take home and make sausage. So anyway -- sorry
11 about that.

12 According to the TR, collagen gel is comprised of
13 3 to 4 1/2 percent collagen, and then the rest of it -- less
14 than 3 percent cellulose, and then the rest of it made up of
15 water. Cellulose is currently approved for use as a
16 synthetic substance in regenerative casings, extruded
17 collagen casings that is dried prior to use, and as an
18 anticaking agent, nonchlorine bleach, and filtering aid for
19 the process product, organic or made with organic.

20 We had another discussion around the viability
21 and the progression of marine materials being used for
22 collagen gel. And so there's a component in here that, due
23 to the dark coloration and some of the odors that are
24 difficult to overcome, that that market really -- that we
25 could find -- that I could find -- had not made much

1 progress; and that sources are not well defined and may vary
2 from bones and skins to include viscera -- the gross stuff.
3 At the time of the technical review, marine sources of
4 collagen remained largely a research debate.

5 So do you have questions on that, Nate? So we
6 had asked to the community, is there a method of production
7 for nonsynthetic collagen gel? And then, what about
8 commercial availability from the organic bovine? And then,
9 maybe a shoutout to potential revenue stream for organic
10 hogs to understand a little bit more about commercial
11 availability. And then, just to ask about advancements of
12 collagen gel in the marine space, to which we did not
13 receive any answers. However, there are a handful of
14 stakeholders who did respond that were supportive of
15 relisting collagen gel.

16 BOARD MEMBER JOHNSON: Thanks, Kim. Nine days
17 left to comment on the pet food rules. Maybe fish scented
18 sausage could be a thing? Nate had a comment.

19 SECRETARY LEWIS: Thanks for the bait, Kim. Just
20 to put on the record that wild fish or people in Alaska are
21 interested in promulgating a wild seafood standard expressly
22 to provide organic collagen to the body care side of things.
23 I don't -- I think they're still struggling with that fishy
24 smell and taste and coloration, but I just wanted to add
25 that to the conversation in this context.

1 BOARD MEMBER JOHNSON: Interesting. Nate Powell-
2 Palm?

3 BOARD MEMBER POWELL-PALM: Kim, do you have an
4 idea of who we should reach out to, to try to get more
5 information on number two -- or again, I'm not sure if our
6 product is commercially available? Like, who would have
7 that data?

8 BOARD MEMBER HUSEMAN: Your -- well, your organic
9 harvesting facilities --

10 BOARD MEMBER POWELL-PALM: Okay.

11 BOARD MEMBER HUSEMAN: -- would be able to give
12 us potential headcount. What you run into when we talk
13 about commercial availability of body parts of animals, and
14 we talk about this, too, in the poultry space is, once the
15 product gets to a point where the meat has been harvested in
16 an organic fashion, the cost to retain the remaining product
17 in organic fashion without a market available for it becomes
18 part of a conventional product line. And I think we can ask
19 those questions, but I think we need to ask ourselves and
20 dig deeper into when we talk about that commercial
21 availability, can we -- is it a -- can we actually isolate
22 that for commercial availability?

23 BOARD MEMBER POWELL-PALM: Thank you.

24 BOARD MEMBER JOHNSON: Any other questions or
25 discussion? Great. Interesting one. Thanks, Kim.

1 2026 HANDLING SUNSET REVIEWS: NUTRIENT VITAMINS

2 AND MINERALS, FERROUS SULFATE

3 BOARD MEMBER JOHNSON: All right. I'm next up
4 with two, and I'm going to switch the order. So nutrient
5 vitamins and minerals, and then, ferrous sulfate will make
6 more sense after we go through the vitamins. And I'm going
7 to jump in here.

8 Okay. So this one requires a bit of a journey
9 and some history. The current listing is nutrient vitamins
10 and minerals in accordance with some numbers and letters, 21
11 CFR 104.20, which is the nutritional quality guidelines for
12 foods. So the current listing basically says, you can add
13 vitamins and minerals to food, in accordance with the Food
14 and Drug Administration's fortification policy. That policy
15 lays out principles that are intended to serve as a model
16 for the rational addition of nutrients to food and promote a
17 balanced and nutrition food supply, while avoiding over or
18 under fortification of consumer diets.

19 So it goes into some situations where it would be
20 appropriate, including where there may be dietary
21 insufficiency to restore nutrients lost in storage or
22 processing, to avoid nutritional inferiority of a food that
23 replaces a traditional food, and as well as where it's
24 required by regulation.

25 It does not encourage indiscriminate addition of

1 nutrients to food, and it's not appropriate to fortify fresh
2 produce, meat, poultry, fish products, sugar, or snack
3 foods, such as candies or carbonated vegetables. And
4 manufacturers are urged to follow these principles.

5 So how did we get here? Originally, when the
6 NOSB recommended to add nutrient vitamins and minerals, the
7 Board wanted to have this listing include the annotation
8 accepted for use in organic foods for enrichment or
9 fortification when required by regulation or recommended by
10 an independent professional organization. That never made
11 it into the rule. We have the rule that currently
12 references the fortification policy I just described.

13 There have been over the years a number of
14 proposals to align the listing with the original
15 recommendation to address concerns about fortification of
16 infant formula, and to consider some nutrients that are sort
17 of in a gray area. So the last time this came up for Sunset
18 in the 2019 recommendation, they -- so I went through some
19 of this history and said that in 2011 when the Handling
20 Subcommittee proposed to change the annotation at Sunset,
21 they received about 2,000 comments against it. And the
22 subcommittee withdrew the proposal prior to the April 2011
23 NOSB meeting. And at that time, the Board supported
24 relisting with the existing annotation.

25 So as far as I can tell -- and I'm sure some of

1 the veterans in the room will have more nuance on
2 this -- but last time we said, okay, let's just leave it
3 alone. So the review this time around, I was trying to
4 assess whether that's still the right place to land.

5 The TR deals with the world of vitamins and
6 minerals, which is huge. They're made in every way you can
7 imagine. There are excluded methods, concerns for some of
8 them. There are accessory nutrient concerns for some of
9 them. But I think at the end of the day, most of the use
10 that falls under this listing is nutrients that have to be
11 added to food. So like milk has to have some vitamins in
12 it. Pasta has to be fortified. In lots of situations,
13 these are places where there's not a lot of room for us to
14 say, no, don't do that.

15 So I think in that world, it's kind of Okay. to
16 group them all together, because we don't have a lot of room
17 to move. But we did ask some questions about the current
18 state of things, including how nutrients and vitamins and
19 minerals are being used, if there are any issues here still.

20 The only thing that stood out to me in public
21 comments is DHA, which takes us to our next history lesson
22 or next phase in time. So there are some outstanding
23 actions that are just sitting there. There was a 2016
24 Handling Subcommittee discussion document that outlined some
25 options. There was a proposed rule in January 2012, which

1 would have changed the annotation to reference the vitamins
2 and minerals identified as essential in another section of
3 the code, and two other sections for infant formula.

4 So that is out there -- neither gone nor done,
5 but there was an interim rule published in September of 2012
6 that essentially preserved the status quo until we figure
7 out what to do.

8 So right now we have a, I think, a generally
9 acknowledged imperfect annotation that's mostly working
10 fine, except DHA, I think, falls into the gray area. It's
11 currently being used. The Board recommended adding it to
12 the list, and it was never added. So it's being allowed;
13 it's in the gray area. No one has fixed it.

14 We could continue to not fix it. Doesn't seem to
15 be a huge deal. We didn't get a lot of comments -- just a
16 few, or we could try to bring this back to life. I lean
17 slightly toward testing out our new annotation process to
18 bring this back to life and just get some closure. We did
19 receive some comments with concern that things are coming in
20 around the edges; that there's still lack of clarity. We
21 heard from certifiers who are using different versions of
22 these various rules and recommendations that have existed
23 and are still out there. So I'm curious to hear from you
24 all. In my mind, the best options from here are do what
25 they did in 2019 and just kind of leave it alone and say,

1 you know, there hasn't been enough public will to push
2 forward on this. Maybe we just don't pick that battle
3 today, or try to bring in the annotation that was in the
4 proposed rule that was never finalized, which essentially
5 limits fortification to essential -- like to required
6 nutrients. And if we did that, I think we would probably
7 also want to recommend that DHA be moved along and added to
8 the list, so that that is clear.

9 And I don't know -- I don't know if you folks
10 weigh in if I get this wrong, but DHA in the petitioned
11 materials database says closed, and references the interim
12 rule that preserved the status quo. So it's like, okay.
13 We got a good recommendation and we are not dealing with it
14 anymore because we're in this kind of limbo period, but
15 there's no plans to move it forward.

16 Okay. So I see puzzled faces which means that
17 was not the epitome of clarity. Welcome questions and
18 discussion. Nate?

19 SECRETARY LEWIS: Can you describe, if you can,
20 the risks in -- that would -- that are potential for going
21 forward with a parallel motion and annotate about required
22 by law with the -- and then pushing the DHA forward? That,
23 sort of, second approach, what are the risks there? That's
24 helpful for me, I think.

25 BOARD MEMBER JOHNSON: I think the main risk is

1 everyone gets angry again. I was in certification when this
2 all kind of bubbled up in the -- I don't know, 20-naughts to
3 early 2010s. And it was very controversial. But as far as
4 I can tell, looking back through the history now, we did
5 reach some resolution and it just never made it into the
6 regulations. So I think bringing it back and doing cleanup
7 would at least save the next Board in five years from going
8 down this rabbit hole again, and bring some more consistency
9 to the certifiers.

10 Okay. Kyla, and then Wood.

11 CHAIR SMITH: Yeah. Did I hear you correctly in
12 the history lesson that you said there was like 2000s
13 and -- there's a bunch -- a bunch of comments that were --
14 and was -- and that was to the 2012 proposal that was -- can
15 you repeat that part? Sorry.

16 BOARD MEMBER JOHNSON: Yeah. And my timing is
17 fuzzy on this. So looking back at the Board's recitation of
18 this history in 2019 -- this is the source -- in 2011, when
19 the Handling Subcommittee proposed changing annotation at
20 Sunset, they received about 2,000 comments against it. So
21 they withdrew the proposal.

22 I'll have to go digging here to see what that
23 proposal was.

24 CHAIR SMITH: Okay.

25 BOARD MEMBER JOHNSON: I think -- I'm not sure

1 how it aligns with the interim election.

2 CHAIR SMITH: The -- yeah. So the proposed rule.

3 BOARD MEMBER JOHNSON: Oh, thank you. See, this
4 is my recollection.

5 CHAIR SMITH: Seemingly something failed in the
6 proposed rule, otherwise it would have made it to final
7 rule, right? And so I guess I'm -- if we're just
8 reproposing the same annotation, it would seem like it may
9 have the same fate or I'm -- like, anyway. So then, I'm
10 like, what's the point? I like cleanup. I think closure's
11 good. And I'm like -- are we -- yeah, I don't know. Are we
12 setting ourselves up for failure?

13 BOARD MEMBER JOHNSON: I think what appears from
14 the relatively few comments this time to be true is that
15 things have kind of settled down and people are using what
16 they need -- feel that they need to use. And so we could
17 make sure that the rule actually matches that. But, yeah,
18 that's a fair risk to name.

19 Wood?

20 BOARD MEMBER TURNER: I was going to ask this
21 during other business, but we might as well do it now. What
22 did -- can you remind me about what the annotation process
23 is now? What have we agreed on? I was going to ask you,
24 Kyla, but I'm putting you in the hot seat, Allison, because
25 I can't remember how it works. I can't remember how it

1 works.

2 CHAIR SMITH: Building the plane as we fly it is
3 the process. We would bring a parallel motion. So we would
4 -- if we vote -- if -- we have to vote on this in the fall
5 to retain the listing. Simultaneously, we could bring a
6 parallel proposal with an annotation that we would also vote
7 on, so that then if that didn't make it through the
8 rulemaking process, we would still have the listing.

9 BOARD MEMBER JOHNSON: Nate?

10 SECRETARY LEWIS: I just had another question
11 about the timing on the, sort of, the renewal in 2012s, the
12 sort of the raucous times, as they say. Do you -- maybe
13 this is more of a program question, but did the -- that was
14 before the Sunset -- the process for Sunset was clarified.
15 And I wonder if that was an element in the milieu, so to
16 speak, that occurred. Do you have any insight into that or
17 are we just kind of spit balling?

18 BOARD MEMBER JOHNSON: I think that's a -- it's
19 plausible that -- yeah, that we didn't have really a system
20 for doing this type of thing cleanly. So could -- it's
21 probably the worst test case honestly, but we could try it
22 anyways. I do -- I worry. So one of the things in -- that
23 I omitted from that brief history or long history is that
24 the NOP had a reversal interpretation that was really hard.
25 They had interpreted the current annotation to allow

1 accessory nutrients, like DHA, ARA, and then talk to FDA,
2 and they said, no, that's not actually right. But by then
3 everyone is using these materials in reliance on the
4 previous interpretation. So there was some messiness around
5 how to get out of that.

6 So I do worry a little bit that there's still a
7 vulnerability for companies that are using these materials
8 that are in the gray area. And I imagine that certainty
9 would be beneficial. But no one's asked us about it
10 recently, so maybe they're fine.

11 Carolyn?

12 BOARD MEMBER DIMITRI: I mean, what I have found
13 is whenever there's like a mysterious thing that I don't
14 know if either you ask Jenny and she knows or I ask, you
15 know, like someone who's been involved in the industry for a
16 really long time, like beyond pesticides or something. They
17 always seem to say, oh -- I'm not suggesting that they're
18 the right person, but someone knows the answer to why that
19 didn't happen. And I feel like maybe you need clarity on
20 that.

21 BOARD MEMBER JOHNSON: Okay. Any other comments,
22 discussion? I can commit to doing a little bit more digging
23 on the why's and what ifs.

24 CHAIR SMITH: Yeah. I was just going to say, I
25 think we have some things to talk about in handling, and

1 we'll -- yeah. I don't know. It seems unclear at the
2 present time.

3 BOARD MEMBER JOHNSON: Yeah. Okay. So in the
4 meantime, anyone listening out there who has a stake in
5 these materials, please send information our way and expect
6 to have some more discussion in the fall.

7 Okay. So then, ferrous sulfate is much more
8 straightforward, except that it's odd that it's listed by
9 itself, although this is actually for, I think, a pretty
10 good reason. Ferrous sulfate is listed for iron enrichment
11 or fortification of foods when required by regulation or
12 recommended by an independent organization, which is
13 basically the original annotation that NOSB had recommended
14 for all nutrient vitamins and minerals.

15 It's covered under the same TR and original TAP
16 as nutrient vitamins and minerals, but it -- this is about
17 supplementation, especially for flour, cereal products, that
18 make an optional enriched claim, and also in baked products
19 and infant snacks. It's made by reacting sulfuric acid and
20 iron. It's listed under the Canadian organic standards for
21 use where required or allowed. It's basically the same for
22 the EU. And it's not listed individually on Japan's or
23 IFORM's standards.

24 There are some encapsulation materials that are
25 sometimes used to prevent iron from creating oxidation

1 reactions that could mess up the attributes of a product or
2 have undesirable effects. Usually, hydrogenated vegetable
3 fat with lecithin is an optional ingredient. And this is
4 really listed individually because iron deficiency is a big
5 problem, but oversupplementation with iron can also make you
6 sick. So this one was pulled out because of that sort of
7 like, particular risk of oversupplementation. Could throw
8 them all back together, but this one seems to function and
9 have some benefit to the individual listing.

10 Didn't get any particularly excited comments on
11 this one. Any additional discussion?

12 All right. Next up, then, we have Logan on
13 potassium phosphate.

14 2026 HANDLING SUNSET REVIEWS: POTASSIUM PHOSPHATE

15 BOARD MEMBER PETREY: Can you hear me all right?
16 Can you hear me all --

17 BOARD MEMBER JOHNSON: Sounds good, Logan, yeah.

18 BOARD MEMBER PETREY: Okay. Thanks. Okay.

19 Potassium phosphate: So this use, it's to control pH in
20 milk and dairy products. Potassium phosphate interacts with
21 milk proteins as an emulsifier preventing the separation of
22 fat and water in cheeses. Manufacturing of this is the
23 neutralization of phosphoric acid with potassium hydroxide.
24 Phosphoric acid is produced by treating phosphoric rock with
25 sulfuric acid. Internationally, it's accepted on the

1 Canadian standards but it's not listed in the others. Human
2 health concerns: We asked if there was any link to
3 phosphates in processed foods and some health concerns, but
4 we did not receive any new information, and all the comments
5 were in favor of relisting this material. Are there any
6 questions?

7 BOARD MEMBER JOHNSON: Any questions or
8 discussion? Short and sweet. I love it. Thanks, Logan.

9 Okay. And then, sodium acid pyrophosphate, also
10 with Logan.

11 2026 HANDLING SUNSET REVIEWS: SODIUM ACID PYROPHOSPHATE

12 BOARD MEMBER PETREY: Another short and sweet
13 one. Okay. And so this is also listed at 205.605(b),
14 synthetics allowed. Its usage -- there's multiple uses, but
15 for organics it is only -- it can only be used as a
16 leavening agent for baked goods, but in other industries it
17 can be -- also, it's the chelating agent to maintain the
18 appearance of cooked or uncooked produce, and emulsifying
19 agent and stabilizer in cheeses. Prevents struvite in
20 canned tuna, and securing accelerator in processed meats --
21 but, again, only as a leavening agent.

22 The manufacturing of this product is sodium
23 carbonate reacted with phosphoric acid and heated to 200
24 degrees Celsius. Internationally, again, it's listed in the
25 Canadian standards, but not explicitly listed in other

1 standards. Also, the human health, again, we asked for
2 phosphate studies linking to health concerns and did not
3 receive any. And no new information. Again, all comments
4 were in support for relisting.

5 BOARD MEMBER JOHNSON: Excellent. Thank you.
6 Any questions or comments on this one?

7 All right. Thank you. On to tocopherols with
8 Kyla.

9 2026 HANDLING SUNSET REVIEWS: TOCOPHEROLS

10 CHAIR SMITH: Yes. So tocopherols are currently
11 listed as a synthetic at 205.605(b). They are annotated to
12 be allowed to be derived from vegetable oil when rosemary
13 extracts are not a suitable alternative. So synthetic
14 tocopherols are currently permitted for use in organic
15 handling and processing; act as an antioxidant ingredient in
16 foods. Tocopherols occur naturally in a variety of plant
17 species, such as cereal grains, oil seeds, nuts, and
18 vegetables. Tocopherols are separated from other compounds
19 in the oil distillate by multiple extraction and refining
20 steps.

21 Production methods for tocopherols are very
22 complex and can involve variations in solvents, acids, and
23 bases, and additives, such as stabilizers. And this can
24 make classification challenging and complicated. There are
25 several ancillaries that can be used as well. Those were

1 all listed in the 2015 TR.

2 As far as environmental impact goes, there could
3 be potential contamination as a result of the manufacturing
4 process of the tocopherols, if certain solvents or chemicals
5 are used, and if these are released into the environment
6 through waste streams. And then, could be a contamination
7 source. There was no stated health -- human health impacts.

8 We did ask for a limited scope TR. It was not
9 received in time to be included in the meeting documents.
10 However, it is now available on the petition substance
11 database. We did ask some questions of stakeholders, namely
12 around adequate and suitable supplies of nonsynthetic
13 tocopherols to meet commercial needs. And then, also,
14 whether or not there is organic tocopherols commercially
15 available. So, again, just a reminder it's listed as a
16 synthetic. Anyway, so we're just exploring reclassification
17 or what that could potentially look like.

18 We've received about a dozen comments, and most
19 were in favor of relisting or, at least, did not state an
20 opposition to relisting. It is pretty widely used. Some
21 commenters did report that they don't use rosemary because
22 of the flavor it imparts in their product. We had some
23 commenters again ask us to investigate about the
24 availability of it natural tocopherols. And if we found
25 that those were available, then to have -- do a, you know, a

1 relisting on 605(a) versus on 605(b).

2 And this is -- anyway, there's a lot to sort of
3 unpack in the TR, and this is one of those things where it's
4 like, do we, you know, annotate versus commercial
5 availability or move the listing through Board action, or is
6 that better to come through a petition? So that's just one
7 of, sort of -- an opportunity is out there for a petitioner
8 to initiate that action, and just one of those ones where
9 we're like, what -- you know, is that better? How should we
10 handle that? That's all I got.

11 BOARD MEMBER JOHNSON: Thank you. Questions or
12 comments for Kyla?

13 All right. Next up is fish oil. Dilip?

14 2026 HANDLING SUNSET REVIEWS: FISH OIL

15 BOARD MEMBER NANDWANI: Okay. So fish oil is
16 205.606, nonorganic agricultural allowed. And 2015 TR is
17 available which gives a lot of details on its uses and also
18 the industrial process and other information. Basically,
19 fish oil is used in organic processing and handling as an
20 ingredient to increase the content of omega-3 fatty acids.
21 And that helps, actually, you know, in foods to benefit
22 human health by contributing to healthy brain development
23 and reducing risks of cardiovascular disease, diabetes, et
24 cetera.

25 It is also used in aquaculture as a feed

1 supplement for farmed fish. In addition to aquaculture,
2 fish oil is used in feed for livestock, such as pigs,
3 cattle, poultry, and sheep. Manufacture: It is produced
4 from fish byproducts or from fish that are specifically
5 caught for the purpose of making fish oil. And between 44
6 pounds -- in the folder it says 20 kilograms, so I converted
7 to -- you know, we use pounds here that -- so 44 pounds to
8 176 pounds of fish oil can be extracted per ton of fish
9 waste.

10 Steps for fish oil extraction -- it's a little
11 bit in detail. I won't go through all the detail, but,
12 basically, it's raw fish or fish parts are obtained, and
13 they go through this process, steaming and drying. And
14 ultimately, it makes the fish meal. And then, fish meal is
15 converted. Another process by hardening, which is performed
16 to further purify the oil.

17 International acceptance in Canada and European
18 economic community, it is listed. Fish oil is another, you
19 know, organic fish or fish products. It's listed there, but
20 no explicitly mentioned in Codex, IFORM, and Japan
21 agriculture standards.

22 Ancillary substances: None. And according to
23 2015 TR, there are no expected significant human health
24 impacts or remarkable environmental issues mentioned.
25 Public comments: Support continued listing of fish oil.

1 And we asked a question to our stakeholders, what concerns
2 on environmental issues be considered for fish oil? And I
3 would like to read here the paragraph, and I'd like to
4 acknowledge prior NOSB recommendation. And according to
5 that -- I mean, that amend the annotation on fish oil
6 restriction sources to fishing byproducts only, and to
7 fishing industries that need third-party sustainability
8 standards.

9 At the fall 2023 NOSB meeting in Providence,
10 Rhode Island, NOP indicated that they would not be moving
11 forward with that recommendation. Some commenters continue
12 to note that moving forward with the organic aquaculture
13 standard and developing an organic production standard for
14 wild caught fish would facilitate the production of
15 certified organic fish oil and could alleviate concerns
16 about overfishing and toxic contaminants present in fish
17 oil.

18 That's all I have. Thank you.

19 BOARD MEMBER JOHNSON: Kim?

20 BOARD MEMBER HUSEMAN: I just want to point out
21 the statement here that says that fish oil is fed to fish
22 because of a deficiency of plants and animals. I think
23 there's a soybean meal -- you know, soybeans that we could
24 add to this. My point to that is we can feed fish oil to
25 fish, but we can't feed feather meal to chickens. Just

1 something to ponder, if anybody wants to take the bait.

2 BOARD MEMBER JOHNSON: Interesting. Yeah.

3 Brian?

4 BOARD MEMBER CALDWELL: I'm not going to rise to
5 that bait. So, Dilip --

6 BOARD MEMBER NANDWANI: Yes.

7 BOARD MEMBER CALDWELL: -- I'm sorry, I didn't
8 understand. Did you say that fish were specifically caught
9 for fish oil or were not?

10 BOARD MEMBER NANDWANI: Yes.

11 BOARD MEMBER CALDWELL: They are?

12 BOARD MEMBER NANDWANI: So, yeah. I read that
13 also, you know. But Kim also mentioned and you are saying
14 so. That's true.

15 BOARD MEMBER JOHNSON: I think there was at least
16 one commenter who said that it's only a byproduct. If
17 someone else remembers, it would be helpful to corroborate.

18 BOARD MEMBER CALDWELL: So, I'm sorry. You're
19 saying -- right. It's only what?

20 BOARD MEMBER JOHNSON: That there's no fishing
21 solely for the purpose of creating fish oil -- that you'd be
22 fishing, and that fish oil would be a byproduct.

23 BOARD MEMBER CALDWELL: Ah, good.

24 BOARD MEMBER JOHNSON: I think a commenter said
25 that -- 85 percent sure.

1 BOARD MEMBER NANDWANI: Yeah, it is from the
2 byproducts or as, you know, from the fish, but they are
3 specifically, you know, for the purpose of making fish oil.
4 So to my knowledge, what I read in TR, that not all the fish
5 they use for, you know, for fish oil production. There are
6 certain types of the fish they use it for.

7 If anyone wants to jump in, welcome, but that's
8 what my understanding is reading the TR.

9 BOARD MEMBER JOHNSON: And we were trying to
10 retrace the marine materials recommendation this morning as
11 --

12 BOARD MEMBER NANDWANI: Oh, that's right.

13 BOARD MEMBER JOHNSON: -- maybe you were here
14 after that all happened. I don't know if someone --

15 BOARD MEMBER NANDWANI: Correct.

16 BOARD MEMBER JOHNSON: -- who was here then could
17 speak to that. It came up in comments that if the
18 recommendation that had moved had gone forward, it would
19 have been relevant for these materials. But we did hear
20 from NOP at last meeting that it's not moving forward.

21 BOARD MEMBER TURNER: I think it was crops -- I
22 think it was crops, but I do -- I am noting all the comments
23 that are made on it. I don't want to be -- I don't want to
24 be the final word on that. I do want to check the
25 background on that, but I believe it was crop fertility

1 specific. So -- but the community, as we saw in the notes,
2 a lot of folks are also confused -- were confused about
3 that, and confused about the fact that it hasn't -- nothing
4 was done with that proposal. So, anyway.

5 BOARD MEMBER JOHNSON: Okay. I see a path --
6 Oh, Amy. Thank you.

7 VICE CHAIR BRUCH: Oh, yeah. Allison, sorry.
8 Yeah, actually, Dilip, I appreciate you bringing up the
9 discussion that we had in Providence under crops last year.
10 It was under my substance, and I'd be happy -- I have a kind
11 of a thorough review -- I'll be happy to share kind of that
12 history with you. I wasn't a part of the original
13 discussion, but it was something we meditated on and tried
14 to elevate in crops as best as we could. But, yeah, you
15 summarized it well, but I'll give you the background
16 information that we deliberated on in crops for your future
17 discussions and handling. Okay?

18 BOARD MEMBER NANDWANI: Thanks, Amy.

19 VICE CHAIR BRUCH: Yeah, no problem. Looking
20 forward to working with you, Dilip.

21 BOARD MEMBER NANDWANI: Sure.

22 BOARD MEMBER JOHNSON: Okay. Thank you. So I
23 think the long story short there is the recommendation we
24 learned last time is not moving forward. So it's still
25 continuing to come up in comments. There's interest in

1 seeing restrictions around what type of fish are feeders for
2 this material, but we don't really have an avenue to move
3 that currently with the NOP's decision to close that item.
4 But we could always bring it back.

5 Any more discussion, comments on this one.

6 Okay. Thanks to the -- gelatin. Kim?

7 2026 HANDLING SUNSET REVIEWS: GELATIN

8 BOARD MEMBER HUSEMAN: All right. Gelatin,
9 listed at 205.606, nonorganic agriculture is allowed.
10 Gelatin casings and collagen gel get lumped together, at
11 least, in particular, in the 2019 TR. The use for gelatin
12 has a wide range. It's used for clarification or as a
13 finding agent in teas, juices, and wines. It's used as a
14 stabilizer, texturizer, thickener, and in capsules. It can
15 be an ingredient or a processing aid in candies. The Gummy
16 Bears -- I think we all had some Annie's Gummy Bears --
17 could potentially have gelatin -- desserts, puddings,
18 marshmallows, dairy products, yogurts, sour creams -- the
19 list goes on to also include cosmetics.

20 Collagen is also on the national list as a fish
21 collagen and is the native form of gelatin and, chemically,
22 the two are indistinguishable -- just a note.

23 Gelatin can be made from many different sources
24 of collagen -- cattle bones, hides, pig skins, and fish are
25 the principal commercial sources. Gelatin may be prepared

1 in a way that is more like cooking and could be considered
2 nonsynthetic. However, gelatin may also be processed in a
3 way that would render it synthetic.

4 All manufacturing operations extract and
5 hydrolyze collagen found in the animals that we just
6 discussed, with subsequent purification concentration and
7 drying operations. Some are simple; some are complicated.

8 We asked stakeholders if there were sufficient
9 commercially available organic gelatin, and then maybe what
10 gaps persist that necessitate gelatin to be on the national
11 list. I think we looked across the uses and the wide scope
12 that gelatin is in the organic space. I think we will run
13 up against some complications based off of the -- like the
14 type of use. I think we've seen it in some other products
15 where maybe some practices require, you know, certain forms
16 of gelatin versus another. So I think based off of the
17 nonanswers that we got from the community, but the
18 overwhelming support, I would say, you know, we're kind of
19 headed in the direction of this being a pretty simple,
20 realistic.

21 BOARD MEMBER JOHNSON: Great. Thank you, Kim.
22 Questions, discussion?

23 All right. Hang on. Three more. We're getting
24 close. Stay with us.

25 Okay. Next up, orange pulp dried. Kyla?

1 2026 HANDLING SUNSET REVIEWS: ORANGE PULP, DRIED

2 CHAIR SMITH: Yeah, orange pulp. This is a an
3 interesting one, actually. So orange pulp -- dried orange
4 pulp is used as a moisture retention agent and fat
5 substitute in baked goods, pastas, salad dressing,
6 confectioneries, processed cheese spreads, beverages, meat
7 products, and frozen foods. Dried orange pulp is a
8 byproduct of the orange juice industry and is manufactured
9 from washed orange peel core and rag, the membrane remaining
10 after juicing. The pulp is mechanically dewatered,
11 stabilized with heat, dried, and milled ground into a
12 powder. The noted concern related to the environmental
13 impact is related to the conventional pesticides used to
14 grow oranges that are then used to make this dried orange
15 powder.

16 And we asked some stakeholder -- or some
17 questions around sufficiency and suitable supplies of
18 organic orange pulp and what are the barriers to overcome
19 like that limit in organic production of dried orange pulp,
20 and what specific products would be in jeopardy if this were
21 to be removed. We received eight comments. Some were in
22 favor of relisting; some were opposed. From the certifiers
23 that responded, it seemed like this is used not widely.
24 There was a couple of operations.

25 We didn't really get a response to the first

1 question that we asked there about, like is there enough
2 suitable -- sufficient and suitable supply, but we did get
3 some responses to the second part around the barriers. So
4 one commenter said, securing and maintaining segregation of
5 organic source materials has often been cited as the main
6 contributing factor to insufficient supply, in addition to
7 the ability to use nonorganic forms at low levels in
8 production formulations.

9 And another commenter said that processing plants
10 for drying the pulp were located too far away from the fresh
11 processing plants to ensure freshness of the product. In
12 subcommittee we talked about that drying process. And it
13 appears that it is patented. And so we weren't sure if that
14 was also playing into the ability for new processing
15 facilities to be built closer to fresh processing plants.

16 Also, in searching in OID for organic forms of
17 orange pulp was a bit challenging. So depending on word
18 combinations, there were some products that came up if you
19 searched for, like, you know, orange powder or whatever. So
20 that is one thing that I wanted to follow up with some
21 certifiers to see if the specific products that were listed
22 in OID are the same thing as this material, or if it's
23 different, or whatever. And also, with the certifiers that
24 responded, maybe just following up directly with them,
25 having conversations on what types of products those are

1 being, you know, used in and -- anyway, just looking at
2 different alternatives.

3 So this one was tricky for us actually,
4 like -- yeah. Not sure about this one.

5 BOARD MEMBER JOHNSON: Thanks, Kyla. Questions,
6 discussions? Kim?

7 BOARD MEMBER HUSEMAN: Yeah. I think it's more
8 of a discussion. I was just looking, from an international
9 acceptance, that's not specifically listed, other than no
10 allowance up to 5 percent of nonorganic content. It's just
11 something, I think, to consider. I think this summer the
12 subcommittee will have a good robust dialogue on this one
13 for sure.

14 BOARD MEMBER JOHNSON: Anyone else?

15 BOARD MEMBER CALDWELL: Yeah. Thanks, Allison.
16 It just seems like this might be a real good candidate for,
17 you know, a commercial availability annotation.

18 BOARD MEMBER JOHNSON: It currently has a
19 commercial availability.

20 BOARD MEMBER CALDWELL: Oh, I'm sorry.

21 BOARD MEMBER JOHNSON: Yup. It's on 606 already.
22 So if it is available organically, then it has to be. So
23 it's really, should it be removed, and then it would force
24 people to use organic.

25 BOARD MEMBER CALDWELL: Thank you so much, Kyla,

1 of bringing me up to speed once again. I feel like there's
2 so much information that we have in these meetings that the
3 new information comes in and older information definitely
4 goes out the back door, because I can't keep it all in. So,
5 thank you.

6 CHAIR SMITH: For future reference when we're in
7 the handling list, it would probably be good to just remind
8 folks when we are jumping from nonsynthetics to synthetics
9 to 606, and in this time, we bounced around quite a bit.
10 And so I can understand some confusion.

11 BOARD MEMBER JOHNSON: Yeah. I had the same
12 thought -- oh, I didn't mention when we switched, but it is
13 because we've been bouncing around. But maybe we can all
14 remember when we introduced materials to emphasize which
15 list it's on. It is a little bit odd to have both the
16 requirement that you do the commercial availability search
17 and the Sunset process for this list because they're quite
18 connected. But I think the goal here is to be searching for
19 products that have become so commercially available that
20 there's not going to be a situation where you would need
21 this listing anymore.

22 Okay. Thanks, Kyla.

23 Our last two, more back to the ocean, got Dilip
24 on seaweeds, Pacific kombu, and then wakame seaweed.

25 2026 HANDLING SUNSET REVIEWS: SEaweeds,

1 PACIFIC KOMBU AND WAKAME

2 BOARD MEMBER NANDWANI: Okay. Thanks, Allison.

3 Okay. Last two Sunsets before we break and
4 pretty much done for the day. Right? Won't take long on
5 this. So before I talk about these two seaweeds, I'll say
6 that thanks to NOP, I don't know if you guys noticed that we
7 had a snake basket and we had this seaweed. I enjoyed it.
8 If you have not, try it.

9 Okay. So two Sunsets on seaweeds. They are
10 pretty much same. And I will first highlight their
11 difference. So the first one is Pacific kombu, and the
12 botanical name is Laminaria japonica. And wakame seaweed,
13 the second Sunset I have that is Undaria pinnatifida. So
14 that's how they are different in their genus and their
15 species.

16 The second is -- wakame seaweed is a brown algae.
17 Okay. So I wanted to just highlight before I go further,
18 because the rest of the information is pretty much the same.

19 So it's 205.606, nonorganic agricultural allowed.
20 And the technical report is available on -- from 2016, which
21 is on marine plants and algae. Subcommittee reviewed these
22 substances. Seaweeds are used as food and in cosmetics and
23 fertilizers processed to extract thickening agents and as an
24 additive to animal feed. Cultivation industries now produce
25 more than 90 percent of the market's demand. Some

1 commercial organizations have been promoting seaweed for
2 restaurants and domestic use with some success.

3 Kombu, it is a Japanese name. It's -- they use
4 as a vegetable. So produced from hundreds of hectares of
5 brown seaweed, *Laminaria japonica* -- as I mentioned earlier,
6 that is grown on suspended ropes in the ocean.

7 Manufacture: So kelps are seaweed and recognized
8 as kombu in Japan, as I mentioned just a moment ago. And
9 various kinds of food made from kombu -- one of the most
10 important of the marine vegetable preparations. The seaweed
11 used in the manufacture of kombu are coarse, broad-fronded
12 members of the kelp family -- which is *Laminariaceae*. And
13 until *Laminaria japonica* was introduced, and other kelps
14 utilized in kombu manufacture are *Arthrothamnus bifidus* and
15 *kurilensis*.

16 Okay. There are several countries they make
17 these seaweeds, you know -- Japan China, Korea, and also
18 Argentinian seaweeds. They have expanded to new markets for
19 human consumption. An Icelandic company whose products
20 includes rockweed which is *Ascophyllum nodosum*, and kelp,
21 which is *Laminaria digitata*. Mechanical harvesting uses
22 specialized equipment and takes place between April and
23 October.

24 Okay. I won't go further in much detail.
25 Seaweed cultivation in the US has grown rapidly in recent

1 years, with farms in Alaska, New England, and the Pacific
2 Northwest. In 2021, production increased from 18 tons to
3 about 440 tons now. Still, it is .01 percent of the world's
4 seaweed. It's the fastest growing sector of the American
5 aquaculture.

6 International acceptance: It is listed in
7 Canada, EEC, Codex, IFORM, and Japan. Ancillary substances:
8 None. And there are no known impact on human health and
9 environmental issues, as per the technical report of 2016.

10 Public comments: They support relisting of
11 seaweeds, these two substances. A stakeholder indicated
12 that the two seaweed materials be reviewed within the
13 broader context of marine materials. As part of the review,
14 consider the addition of an annotation related to harvest
15 restrictions and risk-based testing for toxic materials
16 using a decision tree to identify harvesting areas where
17 testing would need to be performed.

18 And we asked a question to our stakeholders, what
19 harvest restrictions and risk-based testing for toxic
20 materials where testing would need to be performed? So this
21 was about Pacific kombu. And let me see if I have something
22 else in wakame seaweed, other than what I mentioned in the
23 beginning about the scientific name, about the color. So
24 use is the same. Manufacture -- I think I'd like to mention
25 one point here. Several of these countries, those who

1 produce, they say that -- and I'm just quoting here from
2 Argentina -- the National Center of Patagonia, they
3 guarantee that the harvesting methods are performed in a
4 sustainable way. Regulations for the management of brown
5 seaweeds and marine concessions are particularly well
6 developed, and the supply in brown seaweed to the alginate
7 industry is well managed and organized.

8 Okay. I think the rest of the information for
9 wakame seed is also same. No known impact. International
10 acceptance. Several commenters mentioned the prior NOSB
11 recommendation that I mentioned in the fish oil discussion;
12 and that we should be looking holistically at marine
13 materials and sustainable harvest practices.

14 I think that's all I have. Thank you. With
15 this, I'm going to eat my rest of the seaweed soon. Yes,
16 sir.

17 BOARD MEMBER D'AMORE: Yeah, Dilip. Nice job. I
18 am not going to really ask you a question, because I
19 wouldn't want to have somebody ask me a question at this
20 point. But I'm a little surprised with both of these that
21 you -- or we've had no indication of environmental issues.
22 Some of the -- I forgot which one it was, but I had a
23 seaweed a couple of years ago. In terms of disturbing
24 patterns of movement, in terms of how far away was it from
25 the shore, and what it did to the floor of the ocean. I was

1 just surprised to see that, all of a sudden, there's
2 something here that's sounds pretty similar that has -- it
3 just gets a free ride on environmental impact.

4 BOARD MEMBER NANDWANI: Yeah. Go ahead. Sorry.

5 BOARD MEMBER D'AMORE: I was just saying thank
6 you.

7 BOARD MEMBER NANDWANI: Yeah. You're right,
8 Jerry. If you read the detailed -- the technical report,
9 it's given in detail that how these kelps, they are hanging
10 in the -- you know, from the -- these fishermen, you know,
11 in Japan, China, and other countries, they go to these
12 ocean -- in the open ocean, in the open boat, and they hang
13 these kind of ropes like to the floor -- ocean floor. And
14 then, they have specialized hooks from the boat. And then
15 they, you know, they harvest.

16 There was a lot of concern about what you just
17 mentioned. And if you read the report, that it may affect
18 that -- you know, their harvest practices may affect -- you
19 know, there are some environmental concerns there like, as I
20 mentioned in the public comment, and one of the stakeholder
21 mentioned. But these companies they also, kind of -- they
22 guarantee that it's a very sustainable way, but one of the,
23 I think, NOSB member they did review the former one. They
24 reviewed about its practices. If I remember correctly, the
25 name was Emily. If I -- I'm not sure had it bad, or

1 somebody. They did review this proposal. And I just wanted
2 to add that here. So, yeah -- just to add. Thank you.

3 BOARD MEMBER JOHNSON: Thank you. Franklin?

4 BOARD MEMBER QUARCOO: When it comes to
5 environmental impact, seaweed, they actually do
6 bioremediation. Most of the varieties, they actually take
7 toxic materials from water bodies and stuff like that. So
8 for me anytime I hear about seaweed, what I worry about is
9 wherever it's being grown, what amount of pollution is
10 there, because the plants are going to take it up. And when
11 you try to use it as a food source or something, what is the
12 processing that makes sure.

13 So it's actually good for the environment. It
14 takes out toxic materials, but then I worry when it has to
15 be used as food, so where is it grown? How is it processed,
16 so it's safe for us?

17 BOARD MEMBER D'AMORE: Thank you. You jogged my
18 memory. It was a double-edged sword, all right.

19 BOARD MEMBER JOHNSON: Thank you. Yes.

20 BOARD MEMBER TURNER: Even though I know that
21 that work that was done in the fall of 2020 was related to
22 crop fertility, there were two proposals -- oh, there were
23 two proposals related to crop fertility. I do suggest that
24 we spend time this semester looking at those documents,
25 because there may be some things from those documents,

1 especially for the new members, that would be worth learning
2 from and potentially including in this discussion. So...

3 BOARD MEMBER JOHNSON: Thanks, Wood. I think
4 that's a great suggestion. Anything else?

5 All right. That concludes the handling portion
6 of our agenda. Thank you, all.

7 CHAIR SMITH: Okay. Nearing the end. We
8 actually are going to take a break until 3:15. And when we
9 come back, we're going to do a deferred vote, look at the
10 work agenda, have a short discussion, and then we'll be out
11 of here.

12 I got played off the stage.

13 RECESS FROM 3:04 P.M. TO 3:17 P.M.

14 DEFERRED VOTES

15 CHAIR SMITH: Okay. We do have a deferred vote.
16 And so, if you can recall, it was brought up around in the -
17 - changing the word, individuals are expanding -- yeah. Oh,
18 yeah, here we go. Wonderful. This is about the public
19 comment part. So in changing -- the edit that was made was
20 to change the word "impugn" to "malign." And it said, the
21 character of any individual. And it was brought up to
22 expand that to entity or organization. And so do I have a
23 motion to make this friendly amendment?

24 BOARD MEMBER POWELL-PALM: I would make that
25 motion, please.

1 CHAIR SMITH: Do I have a second?

2 BOARD MEMBER HUSEMAN: I'll second.

3 CHAIR SMITH: Perfect. Any discussion on this
4 friendly amendment? Brian?

5 BOARD MEMBER CALDWELL: So the words are entity
6 or organization?

7 CHAIR SMITH: They're right on to the screen
8 there. You can see the red.

9 BOARD MEMBER CALDWELL: Oh, I see. Adding -- I'm
10 glad you have individual still in there.

11 CHAIR SMITH: Okay. Any other questions,
12 comments, discussion?

13 Okay. So I have a motion on the floor from Nate,
14 seconded by Kim, for this friendly amendment to add entity
15 or organization, as seen on the screen. This is a simple
16 majority vote. And the voting starts with Wood.

17 BOARD MEMBER TURNER: Yes.

18 CHAIR SMITH: Mindee?

19 BOARD MEMBER JEFFERY: Yes.

20 CHAIR SMITH: Amy?

21 VICE CHAIR BRUCH: Yes.

22 CHAIR SMITH: Logan?

23 BOARD MEMBER PETREY: (No audible response.)

24 CHAIR SMITH: Kim?

25 BOARD MEMBER HUSEMAN: Yes.

1 CHAIR SMITH: Nate?

2 BOARD MEMBER POWELL-PALM: Yes.

3 CHAIR SMITH: Dilip?

4 BOARD MEMBER NANDWANI: Yes.

5 CHAIR SMITH: Franklin?

6 BOARD MEMBER QUARCOO: Yes.

7 CHAIR SMITH: Nate Lewis?

8 SECRETARY LEWIS: Yes.

9 CHAIR SMITH: Logan?

10 BOARD MEMBER PETREY: (No audible response.)

11 CHAIR SMITH: We're voting on the friendly
12 amendment that you can see on the screen in red, that says,
13 "Adds entity or organization."

14 BOARD MEMBER PETREY: Yes. Yes. Sorry, I got on
15 late. But I remember what we were voting on. Thank you.

16 CHAIR SMITH: Great. Allison?

17 BOARD MEMBER JOHNSON: Yes.

18 CHAIR SMITH: Brian?

19 BOARD MEMBER CALDWELL: Yes.

20 CHAIR SMITH: Jerry?

21 BOARD MEMBER D'AMORE: Yes.

22 CHAIR SMITH: Carolyn?

23 BOARD MEMBER DIMITRI: Yes.

24 CHAIR SMITH: Chair votes yes.

25 SECRETARY LEWIS: That's fourteen yes, one

1 absent. The motion carries.

2 CHAIR SMITH: Okay. Great. Now we are going to
3 vote on the PPM as a whole. So do I have a motion to accept
4 --

5 UNIDENTIFIED SPEAKER: We had it from the
6 subcommittee. Do we need to do it --

7 CHAIR SMITH: I --

8 UNIDENTIFIED SPEAKER: It was an amendment to
9 this proposal.

10 CHAIR SMITH: Okay.

11 UNIDENTIFIED SPEAKER: As amended.

12 CHAIR SMITH: I'm not a parliamentarian. So we
13 have a motion from the subcommittee that comes to the full
14 Board to accept the proposal on the PPM as amended -- a
15 friendly amendment to the motion. It was motioned by Nate
16 and seconded by Amy. And the voting starts with Mindee.

17 BOARD MEMBER JEFFERY: Yes.

18 CHAIR SMITH: Amy?

19 VICE CHAIR BRUCH: Yes.

20 CHAIR SMITH: Logan?

21 BOARD MEMBER PETREY: Yes.

22 CHAIR SMITH: Kim?

23 BOARD MEMBER HUSEMAN: Yes.

24 CHAIR SMITH: Nate Powell-Palm?

25 BOARD MEMBER POWELL-PALM: Yes.

1 CHAIR SMITH: Dilip?

2 BOARD MEMBER NANDWANI: Yes.

3 CHAIR SMITH: Franklin?

4 BOARD MEMBER QUARCOO: Yes.

5 CHAIR SMITH: Nate Lewis?

6 SECRETARY LEWIS: Yes.

7 CHAIR SMITH: Allison?

8 BOARD MEMBER JOHNSON: Yes.

9 CHAIR SMITH: Brian?

10 BOARD MEMBER CALDWELL: Yes.

11 CHAIR SMITH: Jerry?

12 BOARD MEMBER D'AMORE: Yes.

13 CHAIR SMITH: Carolyn?

14 BOARD MEMBER DIMITRI: Yes.

15 CHAIR SMITH: Wood?

16 BOARD MEMBER TURNER: Yes.

17 CHAIR SMITH: Chair votes yes.

18 SECRETARY LEWIS: Fourteen yes, one absent. The
19 motion carries.

20 NOSB WORK AGENDAS/MATERIALS UPDATE

21 CHAIR SMITH: Great. Okay. Now we are going to
22 look at the work agenda. So in CACS we have a couple of
23 items here. So, residue testing for a global supply chain.
24 The document on crop insurance. We'll go to a vote.
25 It's -- I think we did the transition document, so I think

1 that one is done. And the capacity and constraints
2 document, we'll go to a vote in the fall.

3 In crops we have a couple of petitions. Carbon
4 dioxide is still with us, so we took that one back to
5 subcommittee. So we'll see that one again. We also have a
6 petition on pear ester. And then we are working on the
7 compost document as well. These are all the Sunsets.

8 In handling, we have a couple petitions. Allison
9 mentioned these earlier, but the petition for ethylene to
10 expand the annotation to be allowed in potatoes as a sprout
11 inhibitor. Also, an amendment to potassium phosphate to
12 remove the annotation. These are all the handling Sunsets.

13 Colors are coming back, guys. Wait a minute, is
14 this the -- oh, sorry. Wrong list. I'm getting ahead of
15 myself. Colors is next year.

16 Okay. Livestock: We have heard quite a bit
17 about the Meloxicam petition, so we will see that one in the
18 fall. And then, these are all the Sunsets.

19 Materials: There is planned to be a discussion
20 document on induced mutagenesis under the excluded methods
21 umbrella. We'll vote on research priorities. We will also
22 have a proposal on inert. And we did the TR this meeting.
23 So that one is also no longer on there. And that's it.

24 Anything I missed, Subcommittee Chairs, that is
25 not on the table?

1 Okay. Moving in -- yeah. Michelle kindly
2 reminded me that the work agenda is available on the website
3 as well.

4 Okay. Moving --

5 BOARD MEMBER POWELL-PALM: Kyla, can I just talk
6 just a smidge about livestock for a second -- or in other
7 business?

8 CHAIR SMITH: Yeah. I was going to do that in
9 other business, I believe.

10 BOARD MEMBER POWELL-PALM: Perfect. Thank you.

11 OTHER BUSINESS

12 CHAIR SMITH: Yeah. Okay. So we're there. So
13 go ahead.

14 BOARD MEMBER POWELL-PALM: Thank you. Sorry.
15 It's micro movements across the finish line right now.

16 BOARD MEMBER DIMITRI: I just wanted to bring up
17 something. I don't know if this is the right forum for it,
18 but I guess we had many public comments about revisiting the
19 seed document. And I wondered if we wanted to think about -
20 - start thinking about whether we wanted to do something
21 about it. It sort of caught my eye as something
22 interesting. I didn't know if it was a work agenda or other
23 business, so I'm just raising it.

24 BOARD MEMBER POWELL-PALM: Okay. Cool. Because
25 of the materials that we've had on the materials that we've

1 had on the livestock subcommittee this last round, I think
2 we've all started to think a little bit more about animal
3 welfare in organic. And as we go into the fall meeting, I
4 am wondering what you all think about a possible work agenda
5 item similar to what we did with Climate-Smart, looking at
6 how organic is an animal welfare standard, and what ways
7 would we like to highlight it -- not necessarily even
8 something that we have to formally do, but as we go to vote
9 on all these materials on Meloxicam, I'd be so eager for the
10 community, for everyone on the Board, to bring your best
11 anecdotes for what do we love about organics welfare impact?
12 And what can we do better?

13 And thinking of Meloxicam as such a great example
14 of the community coming together saying, we can do better.
15 We have a very well-known material. We are able to address
16 pain needs in a broader, more all-encompassing manner, so
17 let's go. And so other ideas for that, I think, I would
18 really love to sort of point us to that, as we look at the
19 just fantastic success of the Climate-Smart discussion, sort
20 of staking our claim to that conversation. I would love to
21 bring that same energy to animal welfare.

22 CHAIR SMITH: Go ahead, Wood.

23 BOARD MEMBER TURNER: I think that's a great
24 idea. I don't want to get off topic. If there's a
25 discussion on that, I'm going to bring up another point.

1 CHAIR SMITH: Oh.

2 BOARD MEMBER TURNER: Sorry.

3 CHAIR SMITH: Does anybody have comments or
4 questions for Nate? I see thumbs up.

5 BOARD MEMBER POWELL-PALM: Cool. Thanks.

6 BOARD MEMBER TURNER: I just was thinking about
7 your account -- your organic markets discussion document
8 earlier and, you know, just -- no discussion, but I think
9 that it's because there's so many questions and so many
10 opportunities and so many things to think about.

11 And the one thing that I just would encourage us
12 to think about, as you as you think about -- continue to
13 work on that workstream, is just that, for me, the bigger
14 question that you're raising in that document is that we
15 should be able to have -- we should be able to be thinking
16 at the same time about delivering fair revenue, fair wages,
17 fair prices to growers, and offering consumers food they can
18 afford.

19 And I think those two things are -- we have to be
20 able to hold those together. And so I just hope that as you
21 finish up that report -- finish up that proposal and think
22 about what you're -- thinking about that more, I hope we as
23 a Board can sort of have that dialogue, because I
24 just -- I'm more and more convinced of it every day, as we
25 spend another round of hearing from growers, which I, again,

1 appreciate so many of you who've played a role in bringing
2 growers to these meetings, because it's been fantastic.

3 BOARD MEMBER POWELL-PALM: Thank you for that.
4 Yeah. To just highlight, I think, the point you're making
5 is that we can have both. We can have a world where organic
6 food is not a luxury item. And we can have a world in which
7 farmers get paid a fair price. And I think we've been very
8 much supply oriented, just by the very nature of, kind of,
9 the author's resumes on this topic. But we'd love to bring
10 in that sort of finished goods consumer perspective for how
11 are we setting the right goalpost, and what does success
12 actually look like? So thank you for that.

13 CHAIR SMITH: Sorry. Go ahead, Kim.

14 BOARD MEMBER HUSEMAN: You're fine. What I just
15 want to echo that -- and I've had some sidebar dialogue here
16 with Nate on this, too -- and appreciate the lens from the
17 supply side. And my hope would be that as we come into the
18 fall meeting, that we talk about, you know, that further
19 stream and where the constraints are in the further stream.
20 And, you know, hear from -- where does that go? How do we
21 get to what you're talking about? Because there is, there
22 should be that component of where these circles overlap.
23 And that's where we help to generate a sustainable way to
24 grow the market.

25 And my goal, as I've said, is to take the

1 pendulum swing and just find some guardrails that we can all
2 operate in that help to lift it sustainably. And I think
3 that's a piece that is so vital in what we're missing.

4 BOARD MEMBER POWELL-PALM: Sitting next to Kim
5 this meeting, I've re-fallen in love with the word
6 "sustainability." We've taken it back, folks.

7 CHAIR SMITH: I see Amy, and then Logan, and
8 then, Jerry.

9 VICE CHAIR BRUCH: Yeah. Thank you. I think
10 this is a really good focus, and a wonderful focus for the
11 end of this meeting, is the market piece, and really
12 appreciate the comment on bringing farmers to the table. I
13 think this is a great opportunity.

14 We had a few voices in the supply side of things
15 this go around. John Brunquell from Egg Innovations was a
16 good voice for just further insight. And it was encouraging
17 because he made it sound like we can make this happen and it
18 can work on all sides. So I just encourage Board members
19 and the community to reach out to the supply side, and let's
20 get those voices heard during public comments. We need
21 their information to kind of take this document over the
22 finish line. So, thank you.

23 CHAIR SMITH: Logan?

24 BOARD MEMBER PETREY: Thanks. So kind of going
25 back to Woods's comment discussing that more, I'm just

1 curious. Okay. So, Amy, what would it take for your raw
2 product costs to be lower to keep -- to get organic prices,
3 I guess, to where more consumers are not out of that luxury
4 sector? Like, are there other things -- like when I think
5 of how to get raw product costs, it's -- obviously, yield's
6 got to be high. And so you've got to have a really good
7 farming system. And maybe it is rotational things that can
8 be added to your farm to increase yield or to spread out
9 your overhead, whether it's your tractor expenses, your land
10 rent, you know.

11 I feel like once you start filling in -- what are
12 the gaps that are preventing -- it's not meant to be
13 strictly like -- I just feel like there's actually a lot of
14 other things that we might could accomplish that would
15 inherently reduce the raw product costs that people have and
16 that might -- so, or that help, you know, consumer side, and
17 then that would help grow the business, too?

18 CHAIR SMITH: I don't know if Amy's -- she might
19 have -- I don't know. But Nate, I feel like, maybe was
20 going to -- oh, no. Now Amy's back. Go ahead, Amy.

21 VICE CHAIR BRUCH: Sorry. That hand just did not
22 go down. I apologize.

23 BOARD MEMBER POWELL-PALM: Amy, Logan had a
24 question for you.

25 VICE CHAIR BRUCH: Oh, okay. I had a brief

1 moment --

2 BOARD MEMBER PETREY: No, I understand. No, I'll
3 direct that to Nate, then. I know he's a producer and so,
4 what I was asking is what -- what would help you reduce your
5 raw product costs over -- you know, consistently over time?
6 Going back to Wood's discussion on how do we get organics to
7 be maybe more affordable, where more people can consume it,
8 and then demand would go up? So how are we getting that
9 demand up? And I just mentioned, you know, I think crop --
10 as I think about our own farm -- crop rotations would help
11 yields because -- and also help spread overhead costs and
12 equipment costs, you know, things like that, and land rent,
13 things that would ultimately reduce the raw product costs.
14 And so that would help, I feel like, the system.

15 And I just didn't know if you had any other
16 things that you felt like you're probably missing that could
17 really help, so -- that helps the organic industry to be
18 that more consistent, I guess.

19 VICE CHAIR BRUCH: Uh-huh. Yeah. I think the
20 crop rotations are helpful, from a soil health perspective,
21 and eliminating and, I guess, reducing, and then, hopefully
22 eliminating the need for farm inputs, you know. We're
23 growing our own fertility. That's always a goal to try to
24 reduce the inputs, because they are getting extraordinarily
25 expensive. So having those robust crop rotation,

1 complimentary crop rotations, having an outlet for those to
2 support the further innovation of crop rotation, is really
3 important.

4 One thing we're really doing is, a lot of the
5 investment and information seeking, I guess, on equipment,
6 so we don't have any weed escapes. We're doing that all
7 through innovative deployment of different pieces of
8 equipment, whether it be a weed zapper or a flamer on the
9 early front end, just trying to mitigate any -- yeah, weed
10 escapes that would need hand labor to mitigate those. But
11 those are the two that we're really looking at. And then,
12 you know, that that's another plug for these types of NRCS
13 programs. They do help move the needle in reducing our P&L
14 for expenses. They take up a good portion of the payment
15 those -- that OTI 823 is something that's really important
16 to deploy. So, I guess, those are some of the
17 straightforward things that we're working on to lower costs.

18 Nate, do you have any other additions?

19 BOARD MEMBER POWELL-PALM: Sure. I would, very
20 respectfully, challenge your question, Logan, of lowering
21 costs in order to reach a lower consumer price. For me --
22 and this is more, I would say, in the grain space, when I
23 think about a \$6 loaf of bread, a \$5 loaf of bread, if I'm
24 going to have a whole wheat loaf of bread, I -- even at 20
25 bucks a bushel, which is a rock solid price for me -- I'm

1 representing maybe 35 cents in that loaf. And so I don't
2 feel like I need to go any lower or I need to get any more
3 efficient because I'm already a pretty tiny part of the raw
4 goods in that food item.

5 Where I need to figure it out is, how do I not
6 spend three bucks a bushel on shipping it to a seed cleaner
7 before it gets shipped to the mill? How do I get a more
8 direct line for transportation, shrinking the road miles
9 between me and the mill? How do I seek out a -- more
10 customers who are going to be using more whole flour,
11 instead of white flour, as a percentage of their
12 ingredients?

13 So I think there's a certain part where we can
14 say that producers aren't the problem for why food is
15 expensive. There's so many other players in the supply
16 chain getting between the farmgate and the fork who could
17 take a little less of a cut or identify better efficiencies
18 in order to make that possible.

19 CHAIR SMITH: Jerry?

20 BOARD MEMBER D'AMORE: This conversation has
21 really morphed in 15 minutes. And so, where I was starting,
22 you've blown past it so thoroughly, but I'm going to try to
23 be -- to play in the arena we're in right now.

24 So I really think we're talking about the costs
25 to produce, and then money back to the farm. And this whole

1 topic of market development or dollars back to the ranch, I
2 just don't believe -- or, excuse me, to the very, very first
3 thought, which is we can have our farmers whole and feed the
4 masses, or anybody who wants what we produce. I don't know
5 how you can have that conversation without talking about
6 subsidizing and fair share of subsidizing. So I -- those
7 are my two cents.

8 CHAIR SMITH: Nate Lewis?

9 SECRETARY LEWIS: I'll just be really quick, and
10 apologize for being a Debbie Downer on this one. But I just
11 want us to be really, really cautious about talking about
12 prices and competition and market, you know.

13 BOARD MEMBER POWELL-PALM: Let's all form a co-op
14 right now --

15 SECRETARY LEWIS: Well --

16 BOARD MEMBER POWELL-PALM: -- so we can --

17 SECRETARY LEWIS: Just -- you know, I've been
18 trained to be overly cautious on any trust violations.

19 BOARD MEMBER POWELL-PALM: Yeah.

20 SECRETARY LEWIS: So let's just raise that flag
21 and not create any appearance of that.

22 BOARD MEMBER D'AMORE: Could you articulate the
23 key concern there? And that's the other --

24 SECRETARY LEWIS: Talking about prices is a very
25 challenging thing to be doing.

1 BOARD MEMBER D'AMORE: In certain positions.

2 Okay.

3 CHAIR SMITH: Carolyn?

4 BOARD MEMBER DIMITRI: Okay. You've all strayed
5 into my territory, as a person who's worked on the economics
6 of the food system for a lot of years. And I teach an
7 entire class on this. So I'm not going to give you my
8 professorial lecture here, but I would urge us -- we have a
9 lot of talent in this room, a lot of expertise, and we have
10 a limited amount of time, and there's so many important
11 problems. Is this one that is worth our time -- spending
12 all of our time on, or really any of our time on? I mean, I
13 think that has to be an individual, and maybe a Board level
14 decision.

15 CHAIR SMITH: Allison?

16 BOARD MEMBER DIMITRI: Opportunity costs. What
17 won't we be doing because we'd be doing this?

18 BOARD MEMBER JOHNSON: I really hear that,
19 Carolyn. I was going to add on to the -- it just kept
20 building, and there's so much I agree with that we've heard.
21 I do think we need to be very careful about equating farm
22 price -- the farm cost with consumer price. And, in
23 particular, there has been a lot coming out recently about
24 unfair practices in the retail sector -- price fixing,
25 really jacking up consumer prices, without regard whatsoever

1 for farm costs.

2 So, Nate, to your point, the farm piece of the
3 consumer dollar is quite small. And I think we're learning
4 more and more about the retailer role in keeping organic
5 expensive for consumers, likely to the point that it exceeds
6 the cost differential. So looking to the retailer role in
7 all of this, I think, is worth doing.

8 And, Carolyn, to your point, probably not what we
9 need to do here, but in the name of -- you know, we all need
10 to be talking to Congress. We all need to be talking here
11 about what this Board can do. We all need to be keeping an
12 eye on competition in the marketplace and a fair playing
13 field. All the pieces have to be working together.

14 And then looking way back to the beginning, I
15 agree we should do something on seed, Carolyn. I heard that
16 coming through in a lot of comments. So, maybe, Logan, we
17 could put our heads together. I have some ideas, too.

18 CHAIR SMITH: Amy?

19 VICE CHAIR BRUCH: Yeah. I was just going to
20 summarize the last couple minutes and say, this is very
21 reminiscent of a subcommittee meeting of CACS. As Jerry
22 said, the conversation morphs. We build on one thing to
23 another. So this is of our work agenda items, the market
24 constraints, but this kind of gives you -- those that are
25 not on CACS -- how some of the conversation and deliberation

1 goes. So it is really challenging topics. And as Allison
2 kind of noted, and Carolyn, we got to scope them out
3 appropriately for the work that we can do on the Board. So,
4 thank you.

5 BOARD MEMBER POWELL-PALM: I saw Wood's hand up.

6 CHAIR SMITH: Wood?

7 BOARD MEMBER TURNER: Well, I just -- you know,
8 we could have the debate about how we spend our time all day
9 long. We just went through a list of Sunsets, going through
10 many of which are -- I'll go on the record and say, many of
11 which are perfunctory. Many of which we all agree on. Many
12 of which we know nobody's going to comment on. We've spent
13 all this time doing that. So I would argue, this discussion
14 is perhaps a more important part of our conversation than
15 that part. But that's -- I know I'm -- I know that we're
16 legally mandated -- legally asked to do. So I'm not arguing
17 that point here, but I'm just saying, we could have that
18 debate all day.

19 CHAIR SMITH: Carolyn?

20 BOARD MEMBER DIMITRI: It might make people feel
21 happy. Researchers, economists I know are looking into
22 whether organic farmers get like a larger part of the food
23 marketing dollar. So it's not like people aren't thinking
24 about these questions. So, you know, it might take a while,
25 but -- because economic research takes a long time, but it's

1 coming down the pipeline.

2 CHAIR SMITH: Okay. I'm going to switch topics -
3 - awkward transition here -- to -- so we had in-person
4 public comments, guys. First time in a while. We said we
5 were going to trial it out. We had -- we've had -- we've
6 heard arguments on both sides, you know, for and against. I
7 know I personally have jumped back and forth on that. And
8 so I just wondered, since we all had not really experienced
9 it until now, what did you think?

10 Go ahead, Allison.

11 BOARD MEMBER JOHNSON: This has been a really fun
12 meeting, and I think the in-person comments were part of
13 that. And, I guess, two additional observations. One, in
14 thinking through whether it was important to have the in-
15 person comments back, one of the key arguments or concerns
16 was an opportunity for people in the region to show up in
17 person who might not join virtually. We didn't see much of
18 that. We saw a little bit, which was great. And we
19 committed to this in-person road really late, without a lot
20 of notice. So I would be in favor of trying it again, at
21 least in Portland, with good, strong advanced notice to give
22 people an opportunity to recruit local folks to show up in
23 person. So, general support for the idea, but this time it
24 didn't quite fully achieve what I think we were hoping was
25 part of the purpose of in-person comments.

1 CHAIR SMITH: Sorry. I saw Nate, and then Brian.
2 And Jerry, were you raising your hand before or were you
3 like, "Woo-hoo"?

4 BOARD MEMBER D'AMORE: I love it. I'll take a
5 comment at the end.

6 CHAIR SMITH: Okay. Nate?

7 BOARD MEMBER POWELL-PALM: I was just going to
8 ask Allison, how much earlier do you -- I guess I didn't
9 quite catch the timeline that you felt impacted the lack of
10 farmer voices in in-person comments.

11 BOARD MEMBER JOHNSON: I don't know how long it
12 takes, but when we were in Rhode Island, we were still
13 unsure. I can't remember when exactly we made it clear in
14 public that there would be this in-person opportunity, but
15 it was not six months in advance. It was not a year in
16 advance when we noticed the location. So if you have time
17 to sort of like build out your schedule and fundraise, and
18 that sort of thing, it could look different with more
19 advanced notice as a possibility.

20 CHAIR SMITH: Brian?

21 BOARD MEMBER CALDWELL: You know, I just wanted
22 to say that I'm so glad that we had so many farmer comments
23 in all three sessions -- I guess it's -- yeah, basically
24 three sessions. And, you know, just having more slots
25 allowed for that. And I think that some of our members must

1 have recruited some of those farmers, and I'm really
2 appreciative of that.

3 The message that a lot of those farmers gave was
4 heard loud and clear. And I think it has influenced our
5 discussion and our thinking. So really appreciate that.

6 CHAIR SMITH: Jerry?

7 BOARD MEMBER D'AMORE: Yeah. I hadn't thought
8 about the notion of local versus nonlocal. I will say,
9 though, that I was lukewarm about it -- not against, not
10 for. But I wouldn't want to give it up again. And I'm
11 almost at the point where I would ask if there is a way that
12 we could do more of that -- actually have an
13 institutionalized time slot that wasn't this meeting where
14 we could do that. That may be a heavy ask, but, yeah. I
15 thoroughly enjoyed it.

16 CHAIR SMITH: Kim?

17 BOARD MEMBER HUSEMAN: So on the topic of like
18 regional people, well, I think with having the TOPP
19 representation we inherently get an opportunity to talk to
20 farmers and have maybe a little bit -- or maybe we expand
21 the space to ask questions to farmers during part of the
22 TOPP presentation on the regional aspects. You know, we're
23 going to the West Coast. It would be great to hear from
24 some West Coast retailers, some other folks that sit in the
25 seats, not only the -- from the -- I think we have the

1 opportunity with farmers. Yes, I think farmers having the
2 ability to call in during harvest season -- you know, we've
3 seen the impact of having that platform and having the TOPP
4 aspect.

5 So I think when we're calling for people
6 regionally, let's also include adding some pressure for the
7 other segments of the organic industry, and then lean into
8 the TOPP folks to try to get that engagement, too.

9 CHAIR SMITH: Mindee?

10 BOARD MEMBER JEFFERY: I like the idea of having
11 in-person comments in the spring, and just sort of making it
12 regular cadence, because I think then it could be really
13 predictable. But I also like the regionality in
14 that -- when I was on the California Organic Products
15 Advisory Committee we moved it around the state because we
16 got so much engagement locally, especially from county ag
17 commissioner offices. And when those folks showed up at our
18 meetings, it really inspires our process. And I felt like
19 adjacent industries trying to understand organic is some of
20 our hardest stuff right now. And when they come in this
21 room and they see what we did, they're like, "Oh, this
22 process is cool." And I've definitely seen that change as
23 people watch us do what we do.

24 So I like the in-person comments for that reason.
25 I like regionality for that reason. But I think for myself,

1 as a Board member, I'm much more of a write down, think it
2 out processor, than I am a hear it processor. And in
3 respect for the public commenters I really do want to be
4 able to synthesize the information they're giving us and
5 take it into consideration and make it part of who I'm being
6 in the conversations that we have in the context of the
7 Board meeting.

8 And so just thinking about all those pressures, I
9 think a cadence could be really nice because then I know I
10 have to prepare more for the spring meeting because the in-
11 person comments are going to -- you know, I can't -- it
12 just, yeah.

13 CHAIR SMITH: Allison?

14 BOARD MEMBER JOHNSON: I was just going to add,
15 in addition to thinking about timing, the agenda matters a
16 lot, too. I did hear from some people who had reached out
17 to farmers who felt like they didn't have anything to
18 comment on on this agenda, so they didn't. I think we heard
19 from a lot of grain farmers because crop insurance is really
20 important for grain farmers. We heard one veg farmer who
21 was like, "What? Never really thought about it."

22 So having a few rounds of different content on
23 the agenda, in different places, at different times, might
24 give us a few more data points to sort of assess how this is
25 working.

1 CHAIR SMITH: Yeah. I know from one of the
2 things that I have been weighing, similar to what you were
3 saying, Mindee, is about having that space. And just for,
4 you know, Board mental health, like having that bit of
5 break, you know. And there's a -- there were a lot of votes
6 taken in the fall that you have to, you know, turn around
7 and vote the next day. And so, we haven't experienced that
8 yet as a Board. And whether or not that is detrimental to
9 our voting and our own mental health.

10 So, again, I'm willing to, you know, give it
11 perhaps another go, but -- and then I was like, ooh, like,
12 in the spring might be interesting, but then -- I don't
13 know. You sort of lose, perhaps, some of that like -- I
14 don't know. I'm -- yeah -- still weighing it all, but it
15 did bring a lot of energy to the room that was pretty darn
16 awesome.

17 Nate?

18 BOARD MEMBER POWELL-PALM: Do we have to
19 experience something bad to know it's maybe not a good idea?

20 CHAIR SMITH: Yes.

21 BOARD MEMBER POWELL-PALM: In that -- yeah. In
22 that, we've really liked this process. This worked really
23 well. We know that space between hearing public comments
24 and voting also makes the -- as evidenced by how cohesive
25 this group is. The ability to confer, to digest, to feel

1 prepared in making the votes go really smoothly. And so,
2 the idea of if we found a really nice balance, sticking with
3 spring meeting public comments.

4 CHAIR SMITH: Yeah. Maybe, perhaps. Jenny?

5 ADMINISTRATOR TUCKER: Yeah. I did want to jump
6 in with a program perspective on this one. I think -- I had
7 to, kind of, change with my team. I had forgotten that no
8 one around this table was in Pittsburgh. That's
9 unbelievable. And so -- yeah, on this side of the table.
10 So you've attended meetings, but you haven't been here.

11 But I do think, you know, for years and years and
12 years and years, we've had three-day meetings, we had public
13 comment. In terms of institutionalizing the time frame, it
14 actually ended up being a little bit of an elastic process,
15 depending on how many people showed up on the list -- signed
16 up to give public comment, because we wanted to fit in as
17 many people as possible. And, you know, balanced by how
18 much you had to talk about on the agenda. So I do think a
19 certain elasticity there is okay.

20 I think from a program perspective, my personal
21 view would be, pick a lane and go. Right? I -- what I
22 don't like, I'll be honest, we had to go through this in a
23 post-COVID until we stabilized. I don't like this of each
24 meeting deciding what we're going to do next meeting. I
25 think we need to find normal order, whatever that is, have a

1 rule for -- okay, obviously, if there's some kind of big
2 pandemic, we go back to the way we did it then. But if this
3 is going back to the normal order, let's do that, but let's
4 not debate it at each meeting, because I don't think that
5 would be fair. If we ended up having a bad meeting or what
6 would -- whatever this group considered a bad meeting, or
7 people were mean, or things like that, and they said, "Oh,
8 well, we're not doing that anymore," you know, that's not
9 cool. That's the official government term, "not cool."

10 So I think we're either all in or we're not,
11 would be my -- but I would like to get back to, this is how
12 we do things, unless there's an emergency. And that might
13 be not doing it or it might mean doing it, but let's pick a
14 lane.

15 CHAIR SMITH: Go ahead, Kim.

16 BOARD MEMBER HUSEMAN: What -- Jenny, this
17 question might be for you. It might be tabled. But as
18 we're discussing this and finding the lane to pick, what
19 does our timeline look like to get there?

20 ADMINISTRATOR TUCKER: So, Michelle, as soon as
21 we get home -- I mean, Michelle takes a couple days
22 off -- well deserved, particularly after 24 meetings -- a
23 well-deserved break, and then one of the very first things
24 she does is the federal register notice for next meeting
25 because the community really -- or, and the Board, have

1 really liked the open docket. And to open the docket early,
2 we have to have a federal register notice. There's
3 the -- that's the only mechanism by which we can have an
4 open docket. That was determined years and years and years
5 ago.

6 So this is why, you know, again if we can decide
7 to go either way, but we do need to decide probably in the
8 next -- Michelle, couple weeks? A couple weeks, yeah.

9 CHAIR SMITH: Nate Lewis?

10 SECRETARY LEWIS: Personally, I do like having
11 both the virtual and the in-person comments. I think it
12 adds some life to the room. But I also think we need to
13 provide ability to provide -- we need to allow the ability
14 to provide comments in every possible format. And, you
15 know, some people are not technologically savvy and
16 comfortable on the computer, don't have Internet, et cetera,
17 et cetera. And so having both in the system for me checks a
18 lot of boxes.

19 CHAIR SMITH: Okay. Oh, Allison?

20 BOARD MEMBER JOHNSON: Can I make a proposal? I
21 propose we do public comments again in the fall. So we have
22 two data points, instead of one, and advance notice. See
23 how it goes. And that's a big voting agenda. So we see
24 what that's like, and then we commit to committing in the
25 fall to pick a lane.

1 CHAIR SMITH: I think that's a good approach.

2 CLOSING REMARKS

3 CHAIR SMITH: Okay, guys, we did it. Woo-hoo. I
4 just want to thank everybody who is still in the room, still
5 in the Zoom room -- Zoomland, for sticking with us. I love
6 the public/private partnership. Again, I think organic is
7 so unique in this way. And I -- and when I made my opening
8 remarks, I sat on that side of the rope and I fell in love
9 with the process, and here I am.

10 And so, I just -- yeah, I just get so jazzed by
11 this connection. And so -- anyway, yeah. Glad to have been
12 your emcee for the three days. And we'll see you in
13 Portland.

14 Jenny, would you like to say anything?

15 ADMINISTRATOR TUCKER: I'll make a couple of
16 comments. First, let us give a huge round of applause to
17 Kyla Smith for a beautiful job.

18 (Applause)

19 ADMINISTRATOR TUCKER: And everyone in -- left in
20 the audience and online, let's do a huge applause for the
21 Board. Yay. Zoom people.

22 (Applause)

23 ADMINISTRATOR TUCKER: I want to personally thank
24 the NOP team. Michelle, congratulations on finishing your
25 twenty-fourth meeting. This is an amazing team. I don't

1 think folks realize, but we were having an in -- a parallel
2 series of TOPP meetings. The national leads met -- the
3 national cooperative agreement folks met, as well as all the
4 regional leads came together. That, in itself, was a huge
5 lift, as well, that happened in parallel to this. So very,
6 very big week for all of us involved.

7 A couple of key dates coming up. May 10th is
8 public comments due on the market developments rule. So,
9 May 10th, mark your calendars. An Insider went out
10 yesterday. And then, please remember, June 28th is the
11 deadline for nominations.

12 So I will close simply by saying, organic is
13 climate smart. Organic integrity from farm to table.
14 Consumers trust the organic label. Thank you so much for
15 all your work being part of that journey and that success.

16 So, thank you. Be well. Safe travels, and I
17 love you all.

18 CHAIR SMITH: Before I officially close the
19 meeting, I wondered if Amy and Logan wanted to share their
20 new family members with us all.

21 BOARD MEMBER PETREY: I have to be in front of
22 his lens and I just couldn't get him. There he is. There's
23 Peter.

24 CHAIR SMITH: There's Peter. Aw.

25 VICE CHAIR BRUCH: I'll run and go get Stetson.

1 One second.

2 CHAIR SMITH: Sorry. Can't resist --

3 ADMINISTRATOR TUCKER: Of course you're going to
4 gavel and scare the hell out of him.

5 CHAIR SMITH: -- cute babies. Do you have
6 Annabelle, too, Logan?

7 BOARD MEMBER PETREY: I had to send my dad -- or
8 my husband was going to get her. So I tried to order a
9 rooster. You know, I was like -- man, Allison just keeps
10 looking around all the time.

11 CHAIR SMITH: Oh.

12 BOARD MEMBER PETREY: I'm kidding, Allison. I'm
13 kidding.

14 CHAIR SMITH: Good job, you guys. Yes.

15 (Applause)

16 CHAIR SMITH: Momming and NOSB simultaneously,
17 it's pretty incredible.

18 BOARD MEMBER PETREY: Well, I had a great back-
19 office staff to try to make this happen.

20 CHAIR SMITH: All right. I'm going to officially
21 close the meeting. We are adjourned.

22 (Whereupon, at 4:01 p.m., the meeting was adjourned/closed.)

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CERTIFICATION

This is to certify that the attached proceeding before
the:

NATIONAL ORGANIC STANDARDS BOARD

IN THE MATTER OF: NOSB Board Meeting, Spring 2024
PLACE: Milwaukee, Wisconsin
DATE: May 1, 2024

was held according to the record, and that this is the
original, complete, true, and accurate transcript which has
been compared to the recording accomplished at the hearing.

_____  _____

Elaine M. LaRosee, CDLR
Official Reporter

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