

UNITED STATES DEPARTMENT OF AGRICULTURE  
AGRICULTURAL MARKETING SERVICE (AMS)  
NATIONAL ORGANIC PROGRAM (NOP)

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MEETING OF THE NATIONAL ORGANIC  
STANDARDS BOARD (NOSB)

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MONDAY

APRIL 26, 2010

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The National Organic Standards Board convened at 3:00 p.m. in the Heidrick Ag History Center located at 1962 Hays Lane, Woodland, California, Daniel G. Giacomini, Chairperson, presiding.

MEMBERS PRESENT:

DANIEL G. GIACOMINI, Chairperson  
TRACY MIEDEMA, Vice-Chairperson  
KRISTINE ELLOR, Secretary  
STEVE DeMURI

JOE DICKSON  
JAY FELDMAN  
BARRY FLAMM  
JOHN FOSTER  
WENDY FULWIDER  
JENNIFER M. HALL  
KATRINA F. HEINZE

JEFFREY W. MOYER  
ANNETTE RIHERD  
JOE SMILLIE

STAFF PRESENT:

MILES McEVOY

JUDY RAGONESI

VALERIE FRANCES

ARTHUR NEAL

MARK BRADLEY

LARS CRAIL

SHANNON NALLY

DR. KERRY SMITH

DR. LISA BRINES

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

3:02 p.m.

CHAIRPERSON GIACOMINI: Can the Board members please begin getting up to the table, the last of the Board members?

Can we bring the meeting to order, please? Thank you.

Good afternoon, everyone. I officially call this meeting of the National Organic Standards Board to order. Board members who are able to be with us today, all of us finally here, thank you, Joe, are seated, and we have a quorum.

First meeting and you are late, Joe, this is really classic. I love it.

I'd like to move directly into the business of the Board. The first business is the agenda, the agenda for the meeting. It's been posted to the public and presented to the program and the Board.

After we have a motion to accept the agenda we can deal with any motions to

1 amend.

2 Do we have a motion to approve the  
3 agenda for this meeting?

4 MR. MOYER: I make a motion we  
5 approve -- that the agenda be approved.

6 CHAIRPERSON GIACOMINI: Motion  
7 made by Jeff, second from Jennifer.

8 Mr. Maker of the Motion, do you  
9 have any discussion?

10 MR. MOYER: No.

11 CHAIRPERSON GIACOMINI: Is there  
12 any further other discussion on this motion?

13 Seeing none, we'll proceed to  
14 vote.

15 Those in favor say aye.

16 (Chorus of ayes.)

17 CHAIRPERSON GIACOMINI: Opposed?

18 Motion passes.

19 I would like to take a brief  
20 moment to begin by welcoming you all to  
21 California. This is the last time the  
22 National Organic Standards Board met outside

1 of the D.C. area, which we all include as the  
2 Baltimore, was the first NOSB meeting, and it  
3 was my first NOSB meeting in the spring of  
4 2006. That meeting was held in conjunction  
5 with the Pasture Symposium, held at Penn State  
6 University in central Pennsylvania, and,  
7 interestingly, it has now been four years and  
8 the first meeting since the Pasture Symposium  
9 in 2006, to be held outside of the D.C. area,  
10 it is the first meeting since the new Final  
11 Rule for the Access to Pasture has finally  
12 been published.

13 For those of us on the West and  
14 the left coast, it's been a long time since  
15 the Board, this body, has had a meeting in  
16 this Time Zone. We appreciate the opportunity  
17 for the shorter travel schedule, and now you  
18 all have a greater opportunity to see what we  
19 go through at every meeting.

20 MR. SMILLIE: A historical  
21 comment, Mr. Chair. It was -- it used to be  
22 scheduled, there was a meeting in D.C. in the

1 spring, or in the fall, and then a meeting  
2 outside of D.C., and the last one outside of  
3 D.C., and Arthur will remember this, was  
4 proposed by the current head of the Washington  
5 State Department of Agricultural Programs, who  
6 was going to host it, and, actually, that one  
7 was the first one that was canceled for  
8 budgetary reasons and we moved to D.C. sort of  
9 semi permanently.

10 But, now that that person has  
11 moved to D.C., it looks like we're getting  
12 back out to the West Coast.

13 CHAIRPERSON GIACOMINI: Thank you.  
14 So, as one of the members from the State of  
15 California, residing here, I welcome all of  
16 you to California. The weather report is for  
17 continuing nice weather today, but there's  
18 supposed to be some inclement weather coming  
19 in tonight and tomorrow, which is pretty  
20 typical for the weather we've had this spring,  
21 of two and three days of spring, and then two  
22 or three days that feel like winter again.

1 But, we hope you enjoy your visit.

2 We have some interesting  
3 arrangements regarding the food, lodging and  
4 the meeting facilities, and we hope that  
5 everything will work out. And, while this is  
6 not the 12th floor of the ACME building, to  
7 borrow from Mr. Noir, we are all here to find  
8 the answers to some of life's more -- or  
9 organic's more persistent questions.

10 We are continuing to look at  
11 clarity on issues we have dealt with over the  
12 past meetings, from allowing indoor growing  
13 conditions, animal welfare, particularly,  
14 related to animal density standards,  
15 nanotechnology, product labeling, and  
16 classification of materials, and the main  
17 thrust of the entire year of this Board is  
18 dealing with the Sunset Review of substance  
19 and agricultural process on the National List  
20 for 2012. Then there are other numbers that  
21 will be discussed.

22 The current Board, we welcomed



1 five new members in January, and we have been  
2 hard at work on each committee's plans. I  
3 have not had a chance to check with Valerie,  
4 but we put hundreds of hours into conference  
5 calls that we would deal with on a weekly  
6 basis. Almost all of us are probably on one  
7 t one and a half hour conference calls two,  
8 three, four times a week. So, the work and  
9 effort that's put forth by the members of this  
10 Board is definitely appreciated by this Chair,  
11 and I hope by the entire organic community.  
12 It is a great responsibility and a great  
13 commitment that we put forth, that takes away  
14 time from our regular work, our family, and  
15 other free time that we used to fulfill this  
16 responsibility.

17 It's an honor for me to work with  
18 the Board as Chair, and I would like now to  
19 begin on my far left with one of our new  
20 members, to go around and introduce each  
21 member of the Board.

22 MR. DICKSON: Hi, thank you. My

1 name is Joe Dickson. I am the Organic  
2 Certification Coordinator at Whole Foods  
3 Market. I've been watching the work of this  
4 Board for the last six years from the other  
5 side of the table, and I've just been in  
6 absolute awe of the amount of hard work, and  
7 dedication, and ingenuity, and cluck that this  
8 Board has shown over the years. It's an honor  
9 to be at this table today.

10 Thanks.

11 MS. HEINZE: I'm Katrina Heinze.  
12 I am the Scientist Rep on the Board, and Chair  
13 of the Materials Committee, and Chair of the  
14 Joint Materials and Handling Committee.

15 My background is chemistry, but  
16 for the last 15 years I've been in food  
17 manufacturing. I currently lead Food Safety  
18 and Regulatory Compliance for Small Planet  
19 Foods, makers of Cascadian, Muir Glen and  
20 Larabar, and folks who have been watching me  
21 for the last few years know that I am a  
22 dedicated organic consumer, and my focus is

1 really making sure that consumers who like me  
2 choose to make this choice are making a choice  
3 that they have great confidence in, and I'm  
4 excited about a lot of the things that we are  
5 going to be talking about this week.

6 MR. DeMURI: Thank you. My name  
7 is Steve DeMuri. I work for the "Mmm Mmm  
8 Good" Campbell's Soup Company. I direct the  
9 company's Organic Program, all facets  
10 throughout the United States and Canada, and  
11 a little bit of Mexico, and am Chairman of  
12 the Handling Committee on NOSB, and Joint  
13 Chair with Katrina of the Joint Committee for  
14 Handling and Materials.

15 I live here in California, about  
16 20 miles down the road, so I greatly  
17 appreciate having the meeting right here in  
18 Woodland, California this time.

19 So, welcome, everybody.

20 MR. FOSTER: Hello, my name is  
21 John Foster. I am Senior Manager of Organic  
22 Integrity at Earthbound Farm, an all organic

1 produce company, grower, packer, shipper.

2 It's been a pleasure to watch the  
3 Board work for many years, and it is, like  
4 with Joe, a little bit different to see it  
5 from this side of the table, but I'm very much  
6 looking forward to the next five years.

7 I am Vice Chair of the Handling  
8 Committee, also sit on the Crops, the Joint  
9 Handling and Materials Committee, and, of  
10 course, the Materials Committee.

11 It's a real pleasure and a  
12 privilege to be here.

13 Thanks.

14 MR. SMILLIE: My name is Joe  
15 Smillie. I'm the Senior Vice President at  
16 Quality Assurance International. I'm the  
17 Accredited Certifier Representative on the  
18 Board, and I'm Chair of the Certification,  
19 Accreditation, and Compliance Committee, and  
20 serve on the Handling Committee and the Joint  
21 Committee, who are dealing with the  
22 classification of materials documents, which

1 eats up a lot of my time.

2 But, it's time well spent, and I  
3 hope that a lot of you will get a chance to  
4 look at all of our recommendations. We've  
5 gotten a lot of great comments, and we look  
6 forward to pursuing with you to find  
7 recommendations to send to the NOP, to make  
8 this industry work better.

9 I live in Burlington, Vermont,  
10 which is often called the "West Coast of New  
11 England," and, basically, it's my last year on  
12 the committee. I'll be turning -- this will  
13 be my second to last meeting. I've really  
14 enjoyed it. It's been a lot of work, but I'm  
15 very much looking forward to moving it  
16 forward, and I have some concerns about where  
17 we are headed, and I think some of the  
18 documents that will be presented over the next  
19 three days address directly those concerns,  
20 and I look forward to a very active  
21 participation in my last two meetings, and  
22 look forward to passing on the work that the

1 NOSB has done on behalf of the industry to my  
2 successor.

3 MS. MIEDEMA: Good afternoon,  
4 everyone. My name is Tracy Miedema. I am one  
5 of the three Consumer Reps on the Board. I'm  
6 also Vice Chair of the Certification,  
7 Accreditation and Compliance Committee, and a  
8 member of the handling Committee.

9 I was driving out here thinking,  
10 wow, we are really out here, and then  
11 realized, of course, I live two miles up a  
12 dirt road in Philomath, Oregon, so I don't  
13 know what I was thinking there.

14 My approach to the work here of  
15 the Board is really to synthesize information  
16 from as diverse an opinion as I can possibly  
17 gather, and really cast a wide net, and it's  
18 a privilege. I enjoy the work of the Board,  
19 and I really try to do my best to listen to  
20 the public, the private sector, and all here  
21 in the context of this Government framework.

22 MS. ELLOR: I am Tine Ellor, from

1 the mushroom cap of the world, Kennett Square,  
2 Pennsylvania. I'm sitting in one of the  
3 environmentalist seats, chairing the Crops  
4 Committee, and while I'm on that subject I  
5 just want to thank the new members of the  
6 Crops Committee, who have really hit the  
7 ground running, and done a tremendous amount  
8 of work this last midterm.

9           Everyone had homework, you know,  
10 that I assigned every week, and everybody got  
11 their homework in on time. We did a  
12 tremendous amount of work, and I'm looking  
13 forward to hearing the comments.

14           I also am tolerated on the  
15 Livestock Committee, which is, you know, a  
16 little bit strange for me, but I do try hard,  
17 and because no one else would do it I'm  
18 Secretary of the Board this time. So, I'll be  
19 in charge of the timer, you know, and I might  
20 take bribes.

21           Thank you very much.

22           MR. FELDMAN: I'm Jay Feldman,

1 with Beyond Pesticides, which is an  
2 organization some of you may know, have known,  
3 as the National Coalition Against the Misuse  
4 of Pesticides, and I've been doing that for  
5 about 30 years, and had the privilege of  
6 working with many of you on drafting the  
7 Organic Foods Production Act, but I won't take  
8 any blame for that.

9 And, I am, like the other new  
10 members, I am honored, really, to sit on this  
11 Board. I sit in the Environmental slot, and  
12 serve on the Crops Committee, the Policy  
13 Committee, the Materials Committee, and the  
14 Joint Materials and Handling Committee, I  
15 think that's all I'm serving on, is that  
16 right?

17 Thank you.

18 MR. MOYER: I'm Jeff Moyer. I'm  
19 the Farm Director for the Rodale Institute,  
20 and I'm the owner/operator of Sky Hollow Farm  
21 in Southeastern Pennsylvania. That's my family  
22 farm.



1 I'm a Past Board Chair of this  
2 Board. I'm on the Crops Committee. I'm Co-  
3 Vice-Chair of the Livestock Committee, and sit  
4 in on the Handling and the Joint Handling and  
5 Materials Committee, and I hold the producer  
6 position on the Board.

7 MS. FULWIDER: I'm Wendy Fulwider,  
8 and I was a dairy farmer until 1994, and my  
9 son is now on our farm, which is a pastured  
10 livestock farm, and I work for Organic Valley.  
11 I've been there for three years, and I am  
12 their Livestock Care Specialist, and I have  
13 helped them with their outcome-based standards  
14 for the livestock for our farmers.

15 I am currently the Vice Chair on  
16 the Livestock Committee, and I'm also on the  
17 Materials Committee and the Joint Handling and  
18 Materials Committee.

19 MS. HALL: Good afternoon. I'm  
20 Jennifer Hall, and I am a consumer  
21 representative on the Board. I sit on both  
22 the Certification and Compliance Committee and

1 the Livestock Committee. It is my final year,  
2 along with several others here.

3 It has been a great honor to serve  
4 on the Board, and bring what I believe is,  
5 actually, a fairly good consumer  
6 representative, that's not being my total  
7 mainstay every day, there are several  
8 positions I've held professionally while being  
9 on the Board that have, really, I think,  
10 evoked different -- different perspectives on  
11 the work we are doing here.

12 I originally began working for an  
13 NGO that promotes educating chefs around the  
14 country about eating and sourcing more locally  
15 and sustainably, and then worked for a  
16 developer and headed up their farmer's market.  
17 And, just three months ago, I am proud to  
18 report that finally opened a food co-op in  
19 Spokane, Washington, which despite its size  
20 has never had one. And so, it's a pretty  
21 great moment, and it has also brought me to a  
22 whole other group of people, and the type of

1 feedback that the consumers who shop with us,  
2 or don't for whatever reason, have begun to  
3 ask me different kinds of questions than they  
4 had before, so it's nice to funnel those  
5 questions and that curiosity into a direction  
6 that can have some meaning at that level.

7 So, thanks for being here.

8 MS. RIHERD: Hi, my name is  
9 Annette Riherd. I fill a producer slot. I am  
10 an organic fruit and vegetable producer. I'm  
11 really excited to work on the Board.

12 I am Vice Chair of Policy. I also  
13 serve on Crops and Livestock. I promote local  
14 grown food in my home state of Oklahoma. I'm  
15 an advocate for farmer's market, and I'm  
16 really excited to be here.

17 MR. FLAMM: I'm sure glad I picked  
18 Annette to be Vice Chair for the Policy  
19 Committee. She's been helping me out through  
20 all these gadgets ever since I sat down here,  
21 including this computer.

22 I'm Barry Flamm. I was appointed

1 to the Board in the environmental position in  
2 January of '08, and I was the baby on the  
3 Board for a while, but these newcomers usurped  
4 me a few months ago. So, I don't have anymore  
5 excuses for not knowing things.

6 I'm Chair of the Policy Committee,  
7 and also serve on the Crops Committee, and on  
8 the Certification Committee with Joe.

9 I'm from Polson, Montana, and it's  
10 still not too easy to get to a place like  
11 this. I've got to fly almost as many hours,  
12 at least the travel hours, almost as much as  
13 going to Washington, D.C., but I'm sure glad  
14 to have this visit here in California.

15 My background was in forestry and  
16 biodiversity conservation. That's what my  
17 advanced degree is in.

18 But, one of the things I'm most  
19 proud of is that I was the first certified  
20 organic cherry grower on the Flathead, in the  
21 Flathead, and in the whole State of Montana.  
22 So, it's -- I've been really involved in the

1 state in organic matters for a number of years  
2 now, and it's something I'm very devoted to,  
3 and I've been really happy to serve on this  
4 Board.

5 Thank you.

6 CHAIRPERSON GIACOMINI: Thank you.

7 My name is Dan Giacomini, I serve  
8 as Board Chairman. I was Vice Chair last year.  
9 This is my final year on the Board. I've  
10 served on Livestock. I was Chairman of the  
11 Materials Committee for three and a half  
12 years, and I also serve on the -- which I  
13 still serve -- and I also serve on the Joint  
14 Committee for Materials and Handling.

15 I have a consumer seat on the  
16 Board. I live and work just north of the San  
17 Francisco Bay area, and I've been an organic  
18 consumer for over 15 years. I work as a  
19 consultant, I'm an animal nutritionist, and  
20 I've worked with organic dairy farmers since  
21 the first dairy farmer west of the Mississippi  
22 converted to organic in the early 1990s.

1 Since then I've worked with farmers,  
2 certifiers, feed industry suppliers,  
3 inspectors, all different aspects, from all  
4 different parts of the industry.

5 Also related to the matter of  
6 introductions, Board member Kevin Engelbert  
7 won't be able to join us for this meeting. He  
8 sends his apologies. He is Chairman of the  
9 Livestock Committee. He is also on Crops and  
10 Policy.

11 Jeff Moyer will be acting as Chair  
12 for the Livestock -- in the capacity of Chair  
13 for the Livestock Committee at this meeting.  
14 Normally, that is a position taken over by the  
15 Vice Chair, but in her very first meeting  
16 Wendy Fulwider is the Vice Chair for  
17 Livestock, and the plea, the threat, I'm not  
18 sure what you would best call it, Jeff was  
19 more than generous to step in and help her out  
20 on that. I hope and encourage Wendy to -- to  
21 participate in that position as much as  
22 possible, tag team, however you are

1 comfortable. You are certainly welcome to do  
2 that.

3 A little bit of housekeeping. I  
4 would like to ask everyone to please turn all  
5 their cell phones off, or at least on silence.  
6 Any rings that go off during the course of the  
7 meeting, we do not have a lounge in the hotel  
8 across the way, but you will be on the hook  
9 for one round for all members of the Board if  
10 your cell phone goes off.

11 Also, internet services in this  
12 building, please sign up on the wireless under  
13 the guest network. The password is old  
14 tractor, singular, oldtractor, one word, all  
15 lower case.

16 So now, we'd like to turn to the  
17 program for introductions. Miles, as leader  
18 of this intrepid group, if you would please  
19 introduce yourself and your staff.

20 MR. McEVOY: Okay. Hi, Miles  
21 McEvoy, Deputy Administrator, National Organic  
22 Program. We have a number of staff members

1 here with me today.

2 If I can start with Mark Bradley  
3 on my right, Division Director of  
4 Accreditation and International Activities.

5 I have Judy Ragonesi, Trading Manager with the  
6 Office of the Deputy Administrator. Valerie  
7 Frances, the NOSB Executive Director. This is  
8 her last meeting as Executive Director. We  
9 have a new executive director coming in on May  
10 10th, Lisa Ahramijan, and Valerie is moving on  
11 to the Standards Division to help out with the  
12 writing of the program handbook. We have  
13 Arthur Neal on my left here, coming back to  
14 the program after a few years of absence.  
15 He's the new Associate Deputy Administrator  
16 for the National Organic Program, and I am  
17 very, very happy that he's with us, a great  
18 asset for the program, and just a thrill to  
19 have him working with us. And then back on  
20 the left here we have Lars Crail. He's with  
21 the Accreditation and International Activities  
22 team. He's a technical expert for the



1 National Organic Program, inspector from CCOF  
2 before we stole him away. Then we have  
3 Shannon Nally, the Acting Director of the  
4 Standards Division. Then we have Dr. Kerry  
5 Smith, who has been on detail with the  
6 program, and has done a lot of the work on the  
7 Access to Pasture, was the main presenter,  
8 trainer, for the Access to Pasture training,  
9 and we have Dr. Lisa Brines, who we stole from  
10 Washington State Department of Agriculture,  
11 who is our new National List Coordinator.

12 CHAIRPERSON GIACOMINI: Thank you,  
13 Miles.

14 It has become a tradition at the  
15 start of these meetings, this meeting, for the  
16 Board Chairmen to read the Vision and Mission  
17 Statement of the Board, and I would like to do  
18 that at this time.

19 The vision of the NOSB is an  
20 agricultural community rooted in organic  
21 principles and values that instills trust  
22 among consumers, producers, processors,

1       retailers, and other stakeholders.

2                   Consistent and sustainable organic  
3 standards guard and advance the integrity of  
4 organic products and practices.

5                   The NOSB Mission Statement is to  
6 provide effective and constructive advice,  
7 clarification and guidance to the Secretary of  
8 Agriculture, concerning the National Organic  
9 Program, and the consensus of the organic  
10 community.

11                   In carrying out the mission, key  
12 activities of the Board include assist in the  
13 development and maintenance of organic  
14 standards and regulations, review petition  
15 materials for inclusion on or deletion from  
16 the National List of Approved and Prohibited  
17 Substances, recommend changes to the National  
18 List, communicate with the organic community,  
19 including connecting public meetings,  
20 soliciting and taking public comments,  
21 providing timely information and education on  
22 the NOP, making reasonable use of a variety of

1 communication channels, and to communicate,  
2 support and coordinate with the NOP staff.

3 So, that is the mission of the  
4 Board, that is what we strive to meet as a  
5 directive, and, hopefully, that is what -- we  
6 can use that to keep us -- as a little of a  
7 compass as we continue in this meeting this  
8 week.

9 Next on the agenda is the  
10 Secretary's Report. Madam Secretary Tine,  
11 would you give your report, please?

12 MS. ELLOR: The only small matter  
13 of business that we have to take care of at  
14 this point is to approve the November, 2009  
15 meeting transcripts and the voting results for  
16 November, 2009.

17 The link right now is not working  
18 for the voting results, but I sent everyone  
19 out a copy this morning, just to make sure  
20 everybody has it.

21 I think we usually vote on that as  
22 a bundle, correct?

1                   CHAIRPERSON GIACOMINI: Do we vote  
2 that separately or -- both the voting and the  
3 transcripts, Valerie? Just shake your head.  
4 I'll report it.

5                   MS. FRANCES: Whatever you want to  
6 do.

7                   CHAIRPERSON GIACOMINI: Okay, I  
8 just want to make one motion then.

9                   MS. ELLOR: Okay. So, we would  
10 entertain a motion for the --

11                   CHAIRPERSON GIACOMINI: You can  
12 make it.

13                   MS. ELLOR: -- oh, I'll make a  
14 motion that we approve the November, 2009  
15 meeting transcripts and the voting results for  
16 November, 2009.

17                   MS. MIEDEMA: Second.

18                   CHAIRPERSON GIACOMINI: Motion  
19 from Tine, seconded from Tracy.

20                   Any discussion?

21                   Steve?

22                   MR. DeMURI: The new members that

1 weren't here for the last meeting, should they  
2 vote on that or not?

3 CHAIRPERSON GIACOMINI: If they  
4 have absolutely no awareness of it, I would  
5 suggest that they could abstain, but if they  
6 were at the meeting, sometimes they were  
7 probably more awake than we were.

8 So, if they were there, that's  
9 fine by me.

10 So, those in favor of accepting  
11 the motion for that we accept the transcripts  
12 and the voting results for the November, 2009  
13 meeting say aye.

14 (Chorus of ayes.)

15 CHAIRPERSON GIACOMINI: Opposed?

16 Motion passes.

17 Okay, continuing on. Next on the  
18 agenda is the Report from the National Organic  
19 Program. Miles, the show is yours.

20 MR. McEVOY: Well, we have a lot  
21 of things to report, and I'm sorry I have to  
22 have my back to the rest of the crowd here,

1 but I think that's the way it's going to be.

2 Okay, so nice to be here, outside  
3 of Washington, D.C. We have a lot of to  
4 report, so I'm just going to get started, so  
5 let's go to the first slide here.

6 So, what I'm going to talk about  
7 today, priorities of the program,  
8 accomplishments over the last six months, the  
9 Office of Inspector General Audit, a little  
10 bit of details on pesticide residue testing,  
11 what we are thinking about that. We've had a  
12 lot of questions on that. A little bit about  
13 personnel and budget, strategic planning,  
14 activities of the Accreditation Division,  
15 equivalency, what we are doing with  
16 enforcement, what we are doing with the  
17 program handbook, response to the November  
18 NOSB recommendations, and then we'll get into  
19 the interesting topics of Corn Steep liquor  
20 and nutrient vitamins and minerals.

21 Dr. Lisa Brines is going to give  
22 the presentation on Corn Steep liquor, and

1 then I'll come back for the nutrients,  
2 vitamins and minerals.

3 Okay, so the priorities of the  
4 program. First and foremost is to uphold and  
5 enforce the standards. That is our focus,  
6 everything else kinds of supports that  
7 overarching goal.

8 Then there's implementing and  
9 enforcing the Access to Pasture Final Rule.  
10 When I was here in November, when we met in  
11 November, it was to publish the Final Rule,  
12 now that it's published there's still a lot of  
13 work to do, in terms of implementation and  
14 enforcement. We are through the first stage  
15 of that, in terms of doing the basic outline  
16 of what the rule entails, doing some training,  
17 but we still have a lot of work to do in terms  
18 of implementation and enforcement of that  
19 rule.

20 Developing a strategic plan for  
21 the program is a priority. You'll see some of  
22 the initial stages of that this afternoon.

1 Website revision and improvements, we've done  
2 some, there's more to do there.

3 Implementing the NOSB  
4 recommendations is a very big priority for the  
5 program. You guys have done a lot of work  
6 over the last five to ten years, that we have  
7 a lot of work to do to catch up with you.

8 Peer review, the National  
9 Institute of Standards and Technology, ISO  
10 compliance, quality system management, they  
11 kind of all kind of fit together. Those are  
12 priorities for the program.

13 Program handbook, to clarify and  
14 have consistent standards that certifiers and  
15 certified operations can operate under.

16 Increased training, and then an  
17 organic database to have a live database of  
18 all certified operations, with the current  
19 products that they are certifying.

20 Accomplishments over the last six  
21 months, we published the Access to Pasture  
22 Final Rule, providing guidance and training to



1 certifiers and certified operations, clarified  
2 the requirements for liquid fertilizers with  
3 over 3 percent nitrogen with a clarification  
4 on that in December. We issued instructions  
5 on the eligibility of yeast for organic  
6 certification, provided instructions  
7 concerning the allowance of green waste  
8 compost with the issue of bifenthrin  
9 contaminants in compost. We kind of clarified  
10 that through these instructions that we just  
11 put out in the last couple of weeks.

12 We moved the NOSB meeting out of  
13 D.C. This is where we are supposed to get  
14 people cheering a little bit.

15 (Laughter and cheering.)

16 MR. McEVOY: We published a  
17 tetracycline/sulfurous acid proposed rule. We  
18 have increased training. We've done trainings  
19 in Savannah, Denver, Albany, LaCrosse,  
20 Nuremberg and Woodland, and we have more  
21 planned for later this year.

22 We've strengthened enforcement

1 procedures, in terms of adverse actions and  
2 civil penalties. You'll hear a little bit  
3 more about that later.

4 And then, increased transparency  
5 through publishing an NOP monthly report that  
6 you can find on the website, and we are now  
7 starting to publish all suspended, reinstated  
8 and revoked operations.

9 Okay, Office of Inspector General  
10 Audit, the National Organic Program, when I  
11 got here, got to USDA in October, this report  
12 was winding up. It has a lot of pretty  
13 serious findings in there and recommendations,  
14 but it really provides a road map for the  
15 program, in terms of how to -- what are the  
16 areas that we need to focus on to improve the  
17 program.

18 First of all, more timely  
19 enforcement, that was in a number of the  
20 findings around the timeliness and the follow  
21 through with enforcement, both on complaints  
22 and violations. They found that the oversight

1 of the California State Organic Program was  
2 lacking. They found that pesticide residue  
3 testing had not been implemented as outlined  
4 in the Organic Foods Production Act.  
5 Accreditation and peer review needed  
6 improvement.

7 Overall improvement of the quality  
8 management system, providing clarity and  
9 consistency to certifiers, the Office of  
10 Inspector General found that different  
11 certifiers were implementing the rules in  
12 different ways, so providing consistency is  
13 very important. And then, not all the audits  
14 of foreign certifiers had been completed.

15 So, in terms of recommendations,  
16 there's 14 recommendations in the Office of  
17 Inspector General Report. Recommendations one  
18 to six have to do with compliance and  
19 enforcement, and follow through with  
20 violations. So, there's a number of things  
21 that we've done to start to address that and  
22 resolve those issues, our Corrective Action

1 Plan. Enforcement actions are being pursued  
2 on those parties that were identified in the  
3 report that had not been pursued.

4 We are in the process of  
5 evaluating the civil penalty procedures, and  
6 updating those. We are also evaluating them  
7 to see if there's the need for regulatory  
8 change for civil penalties.

9 The administrative sanctions  
10 policy has been developed. We have issued one  
11 \$6,000 civil penalty, under a settlement  
12 agreement. We've improved the complaint  
13 reporting and timeliness. We have procedures  
14 for monitoring continued compliance. So, one  
15 of the findings of the report was that there  
16 was a complaint that was closed, violations  
17 were found, but then when they went back later  
18 they found that that operation was still in  
19 violation of the standards.

20 So, now we have procedures in  
21 place that, once we close out complaints we  
22 will be looking back at these operations in

1 the next -- over the course of the next year,  
2 to see that they continue to be in compliance.

3 And then, we've also resolved or  
4 referred to the Office of General Counsel some  
5 old complaints for potential adverse actions.

6 In terms of the California State  
7 Organic Program, we conducted an audit in  
8 December of 2009, and California has responded  
9 with the findings. They have a new quality  
10 manual, a new program that they are in the  
11 process of implementing, and it includes  
12 corrective actions for the eight findings that  
13 we have had on the program.

14 Periodic residue testing, we plan  
15 to require sampling later this year.

16 We'll talk a little bit more about  
17 that periodic pesticide residue testing.  
18 There's a lot of different components to  
19 pesticide residue testing that need to be part  
20 of the overall plan, sample collection  
21 procedures, what type of sample is going to be  
22 collected. Is it going to be a spot sample,

1 representative sample, random sample, is it  
2 going to be farm samples, is it going to be  
3 market-based samples? So, we are working out  
4 the details of how that's going to happen.

5 So, who is sampled, are the  
6 certifiers going to be collecting the samples,  
7 are AMS personnel going to be collecting the  
8 samples, how do we include foreign operations  
9 in the residue testing program? Sample  
10 analysis, we are pretty sure we are going to  
11 use the AMS lab in Gastonia, North Carolina,  
12 and it will be a multi-residue type of sample  
13 analysis.

14 And, once we get the analysis of  
15 the samples that are collected, what do you do  
16 with them? How do you get the information  
17 back to the certifier, and the certified  
18 operation, and then what do you do with the  
19 results, because we are certainly going to  
20 find positive residue results. So, different  
21 procedures need to be in place for residues  
22 that are under 5 percent of the tolerance

1 level versus results that have over 5 percent  
2 of the EPA tolerance level.

3 And, there's also going to be  
4 times when you are finding residues of  
5 substances that don't have any tolerances.  
6 So, all those types of procedures need to be  
7 worked out. We are working on those  
8 specifics.

9 And then, so we have these results  
10 that we get back to individual operations, we  
11 also need to have a way of reporting this back  
12 to the public and to the NOSB, in terms of the  
13 summary of the results. So, all those things  
14 are being worked on.

15 Okay. Other things that we are  
16 doing for the Corrective Action Plan from the  
17 OIG report, we are revising the audit review  
18 criteria. These are the criteria that the ARC  
19 branch uses when they do the accreditation  
20 audits of the accredited certifiers, and that  
21 will include a greater focus on materials,  
22 labels and Access to Pasture. We also will be

1 providing an annual summary of the audit  
2 findings for continual improvement to the  
3 audit process, to the accreditation process.

4 So, that report, I think we'll be  
5 able to make that available to the public, to  
6 the National Organic Standards Board, in terms  
7 of what we are finding, in terms of common  
8 violations of the standards to the  
9 accreditation process.

10 All foreign audits of accredited  
11 certifiers are now complete, so we are up to  
12 date there, and then we are in the process of  
13 having an assessment conducted by NIST, the  
14 National Institutes of Standards and  
15 Technology, and that should be completed by  
16 the end of this fiscal year.

17 The program handbook, this is one  
18 of the areas, the findings that they had was  
19 that lack of consistency and clarity, in terms  
20 of specific areas of the standards. So, we  
21 are working on a program handbook to provide  
22 guidance to certifiers and certified



1 operations. We plan to have the first edition  
2 out this summer, it will be issued as a draft  
3 guidance.

4 We are also working on a quality  
5 management system, document control, records  
6 management, notification procedures to ACAs,  
7 and notification to certified operations. So,  
8 lots of things going on to address the  
9 findings of the OIG audit.

10 So, age of enforcement, we talked  
11 about this last time, talking about the Deputy  
12 Secretary, Kathleen Merrigan's focus on the  
13 age of enforcement for the organic food  
14 industry, for the National Organic Program,  
15 civil penalties that will continue to be a  
16 focus of the program, clarification and  
17 enforcement on Access to Pasture and labels,  
18 looking at increased market surveillance, to  
19 see that there's compliant labels in the  
20 marketplace, increased use of unannounced  
21 inspections, pesticide residue sampling, as I  
22 just talked about, and then developing a

1 system of risk-based inspections to put our  
2 resources where they are really needed.

3 So, we have some certifier  
4 initiatives. As I said, an up-to-date database  
5 of all certified operations. I think this is  
6 really important. It's going to take us a  
7 while to develop this database, but we need to  
8 have one source where you can find the current  
9 status of the certified operation.

10 It's very interesting, when we  
11 published that list of suspended operations on  
12 the website, we found that one of the  
13 suspended operations was certified by another  
14 certifier. So, what had happened there, if  
15 you look at that list of suspended operations,  
16 I think 99 percent of those suspended  
17 operations were suspended because of  
18 administrative problems, they didn't pay their  
19 fees, or they didn't submit their annual  
20 update.

21 So, one of those operations, who  
22 had been suspended, another certifier, without

1 their knowledge, had certified them. So, you  
2 had an operation that was both suspended and  
3 certified. So, by making this information  
4 transparent, we are resolving that particular  
5 situation. We need one list of certified  
6 operations.

7 Qualifications and accreditation  
8 of inspectors and auditors, to make sure that  
9 inspectors and auditors are meeting certain  
10 standards of qualification, and, possibly, an  
11 accreditation system, bringing them into the  
12 accreditation system.

13 ISO Guide 65, Compliant NOP  
14 Accreditation Program, to align the NOP  
15 accreditation with ISO criteria.

16 Increased use of training modules,  
17 and then kind of a new initiative is that we  
18 are looking at providing technical assistance  
19 to certifiers through our Compliance and  
20 Enforcement Branch, regarding adverse action  
21 procedures.

22 What we are finding is that with

1       some certifiers they are not following proper  
2       procedures, and cases are being lost, or  
3       there's just not the proper adverse action  
4       procedures. So, we are going to provide more  
5       assistance to certifiers to make sure that  
6       they are doing those things correctly.

7               Okay, a little bit about the  
8       organizational structure of the program. We  
9       have the Office of the Deputy Administrator,  
10      with three divisions, Standards Division,  
11      Compliance and Enforcement Division, and  
12      Accreditation and International Activities.  
13      We work very closely with the Audit Review and  
14      Compliance Branch of Livestock and Seed. They  
15      are the ones that do -- are the lead on the  
16      audits of the accredited certifiers.

17              NOP appeals is a separate program  
18      in another part of AMS. They are the ones  
19      that hear all the appeals for adverse actions  
20      that the NOP has taken, and certifiers are  
21      taking, and then we are also working very  
22      closely with AMS Compliance, to do

1 investigations on complaints.

2 Budget, this is similar to what  
3 you saw in November, except we have a 2011  
4 proposed budget, moving the program from about  
5 \$7 million up to \$10.1 million.

6 And then the next slide kind of  
7 shows, I think I still left this slide in, if  
8 you'd go to the next slide, it shows kind of  
9 graphically what we are looking at, in terms  
10 of staff and budget. So, you have a very flat  
11 funding from 2002 to 2007, and then it starts  
12 to grow over the last couple of years, and  
13 then a big leap in the number of staff,  
14 especially, for 2010, which we still are  
15 working towards 31.

16 So, a little bit about the budget.  
17 This just gives you a little bit of a sense of  
18 where the money is going. NOP salaries and  
19 benefits, the vast majority of the budget goes  
20 there, about \$3.9 million, administrative  
21 support for the program, another \$300,000  
22 there. There's overhead for being in the

1 agricultural marketing service, about \$700,000  
2 there. NOP appeals, even though we don't  
3 oversee that program, we still pay, part of  
4 our budget is used to staff that program.  
5 That's about \$300,000. AMS compliance is  
6 about \$200,000. NOSB is about \$100,000.  
7 Travel \$200,000. Goods and services another  
8 \$300,000. The technical reports that the  
9 Board uses for your work on petitions and the  
10 National List, that's about \$200,000 there,  
11 and that's not enough, so we need more money  
12 to be put into that with all the technical  
13 reports that are going to be happening.  
14 \$300,000 for the database, that's probably not  
15 enough either. Residue testing, another  
16 \$300,000 there. And then, some additional  
17 projects, the NIST assessment, the training  
18 and the program handbook, another \$200,000  
19 there. Just kind of an overview of where some  
20 of the money goes in the program.

21 In terms of personnel, the staff  
22 is much larger than it was in November. In

1 the Office of the Deputy Administrator,  
2 there's myself, Arthur Neal is the Associate  
3 who started in March, Katherine Bennum, the  
4 Advisory Board Specialist and Office Manager,  
5 that keeps everything running back in D.C., a  
6 very critical part of the program. Valerie  
7 Thorne is the Secretary. Lisa Ahramijan is  
8 our new -- your new Executive Director.  
9 Unfortunately, she wasn't able to come to this  
10 meeting, but I think you'll find that she's  
11 really going to be a wonderful asset for the  
12 Board. She starts on May 10th, and we are  
13 really excited about having her come to the  
14 program. She comes from National Institute of  
15 Health. She has an agricultural background.  
16 She's very comfortable with technical and  
17 scientific literature, and she's also worked  
18 as a kind of for a FACA board in the past.  
19 So, she has a lot of experience working with  
20 similar types of advisory boards.

21 Judy Ragonesi is the Training  
22 Manager. We have a grant specialist position

1 that is unfilled, that that position closed,  
2 we haven't quite filled that position yet,  
3 that's the person that will oversee the cost  
4 share program, and then we'll be hiring a  
5 quality manager to oversee the quality  
6 management system.

7 In the Accreditation and  
8 International Activities Division, Mark  
9 Bradley is the Directly, JD Melvin mostly  
10 focuses on international issues, Bob Pooler is  
11 now in that division working on accreditation,  
12 as well as Mary Lou Lusby, and then we have  
13 three NOP technical experts, Meghan Kuhn, Lars  
14 Crail and Catherine Cash. These are all  
15 highly-seasoned, highly-experienced organic  
16 inspectors that we've brought into that  
17 division to help out on the audits and the  
18 oversight of certifiers.

19 They each have one third of the  
20 globe as their purview. Meghan Kuhn has  
21 Eastern United States and Europe. Catherine  
22 Cash has the Midwest and South America, and



1 Lars Crail has the West Coast, except for  
2 CCOF, and Asia.

3 Okay, Compliance and Enforcement  
4 Division, Ruihong Guo is the Director, and  
5 Valeri Schmale, Tammie Wilburn, Andrew  
6 Regalado, Kristin Thornblad, Lorraine Coke and  
7 Renee Mann, the last two are West Coasters  
8 that we got. Lorraine Coke comes from an  
9 organic farm in California. We are really  
10 pleased to have her, and Renee Mann comes from  
11 OMRI, so we are very pleased to have her to  
12 bring some more material specialists into the  
13 program.

14 Standards Division, we still have  
15 an unfilled director position. Shannon Nally  
16 has been gracious to be the Acting Director  
17 for the last six months now. Toni Struther,  
18 Valerie Frances, Stacy Jones, Lisa Brines,  
19 Emily Brown Rosen, Mark Keating, those are the  
20 folks that are in the division, and we still  
21 have two unfilled positions. We are looking  
22 for a food scientist and a livestock

1 specialist to kind of round out the Standards  
2 Division.

3 And then, we have some folks on  
4 details. This is a nice feature that USDA  
5 has, of allowing people from other programs to  
6 work in other programs to gain experience and  
7 to help out the program. So, we have Dr.  
8 Kerry Smith, she's been helping with the  
9 Access to Pasture training. Soo Kim is a  
10 writer, helps out with a lot of the briefings  
11 and control correspondence that we have to do.  
12 Lee Cliburn comes from the Cotton Program, and  
13 she's doing -- helping out with some rule  
14 writings, National List rule writing. And,  
15 Dana Stahl is with the ARC branch, Livestock  
16 and Seed Program, has a lot of experience in  
17 quality management and ISO systems. She's on  
18 a half-time detail to help us with putting our  
19 quality manual together.

20 There's a lot of things going on  
21 at USDA. It's very exciting. With the  
22 leadership of Deputy Secretary Merrigan, she's

1 implementing a USDA organic plan, it's under  
2 development, it should be released some time  
3 in the next, oh, I don't know, month or so.  
4 We are trying to wrap up our piece of that  
5 this month, and what it will have is a -- it  
6 will be a plan for the whole department, all  
7 USDA agencies and mission areas are  
8 contributing to the plan.

9           There's a lot of things going on  
10 within the department to support organic  
11 agriculture. In the past, a lot of that fell  
12 on the shoulders of the NOP, and so this  
13 allows the NOP to really focus on the  
14 regulatory mission, and allow these other  
15 programs to support other aspects of organic  
16 agriculture.

17           So, there's the Agricultural  
18 Marketing Service, Organic Market News, they  
19 have a new feature that's out there for you in  
20 the marketing realm, Natural Fruit & Vegetable  
21 Organic Summary, it's available every Tuesday  
22 on line. It gives you specific information

1 about market data, wholesale and shipping  
2 point prices and movement data.

3 NRCS does a lot of things for  
4 organic agriculture. They have the Organic  
5 Transitions Program, and EQIP funding.

6 We are in the process of entering  
7 into a Memorandum of Understanding with  
8 Foreign Ag Service. This is to provide  
9 greater oversight or, basically, information  
10 about what's going on with foreign organic  
11 operations.

12 And then another initiative that  
13 we have is to establish HTS codes, which are,  
14 if I get this right, Harmonized Trade System  
15 codes, and this will -- currently, we really  
16 don't know how much organic product is being  
17 imported into the U.S., and this will allow  
18 that to be tracked by Department of Commerce,  
19 so we'll really know both the quantity and the  
20 types of products, organic products, that are  
21 coming into the U.S. So, hopefully, that will  
22 get established in the near future.

1                   There's also a USDA Organic  
2                   Coordinator position that's been established,  
3                   and this is to coordinate organic activities  
4                   throughout the department. That will be in  
5                   the marketing and regulatory program's mission  
6                   area.

7                   And then, of course, there's lots  
8                   of research that supports organic agriculture,  
9                   the Organic Research Education Initiative, the  
10                  Sustainable Agricultural Research and  
11                  Education Program, and the Agricultural  
12                  Research Service. Lots of things out there to  
13                  support organic agriculture.

14                 Okay. Strategic planning update,  
15                 we are currently engaged in a strategic  
16                 planning process. We are conducting -- it's  
17                 being conducted in segments between March, is  
18                 when we started, and we'll finish up in July.  
19                 The objectives of the planning process are to  
20                 reaffirm the NOP mission and the shared sense  
21                 of purpose, to identify the key customers and  
22                 audiences of the NOP and the NOSB, and their

1        respective needs and interests, to develop and  
2        prioritize clear goals, objectives and  
3        actions, to develop performance measures that  
4        will assess success, establish a communication  
5        plan as we move our plan into operation, and  
6        to align the NOP with critical goals in USDA  
7        and AMS strategic plan.

8                    I sent a copy of the Executive  
9        Summary to the NOSB last week. I have copies  
10       of the Executive Summary with me here today.  
11       I'll give you a hard copy of that Executive  
12       Summary, and for the other folks in the  
13       audience, those copies are available. We will  
14       put this up on our website, I think, tomorrow.  
15       We are really looking for feedback into that  
16       process.

17                    So, in terms of an initial draft,  
18       our strategic goals include developing  
19       publishing and maintaining a documented  
20       quality management system for the efficient  
21       and effective operation of the NOP, develop,  
22       communicate and apply clear and consistent NOP

1 standards in a uniform manner across all  
2 stakeholder groups, enhance compliance and  
3 enforcement of the organic label, improve NOP  
4 communication with internal and external  
5 stakeholder groups, and continue to build and  
6 develop an effective and well-trained NOP  
7 team.

8 So, these are our five goals that  
9 we came up with in March, and we are looking  
10 for input on that, and further collaboration  
11 with NOP. I know we had a plan to have a  
12 retreat together in mid-February. It's good  
13 that it didn't happen, because that was the  
14 snowstorm week. Even if we had gone forward  
15 with it, it would not have happened.

16 I apologize for getting  
17 everybody's hopes up on that retreat. We have  
18 some possibilities of getting -- inviting a  
19 few people to our retreat in June, but because  
20 of the FACA restrictions we can't have the  
21 Board meet as a -- separate from a public  
22 meeting. So, we'll see what we can do to

1 collaborate with the Board, get input into the  
2 strategic plan, and, yes, we'll just keep  
3 working on that.

4           So, we are inviting your input,  
5 NOSB's input, and also the public's input.  
6 The first step was that strategic planning  
7 session that we did in March. We are looking  
8 for feedback from the NOSB and other  
9 stakeholders, and then we are having a two-day  
10 internal planning session in June, and then  
11 we'll do the review and roll out in June and  
12 July.

13           So, the feedback goes to the  
14 meeting facilitator. We'll give you copies  
15 of that, and you can send your comments  
16 directly to her.

17           All right, a little bit about  
18 what's going on with accreditation and  
19 international activities. As I said, Mark  
20 Bradley is the Director. We are now requiring  
21 audits prior to new accreditations, so that we  
22 can review the capacity of an operation of a



1 new certifier to do quality work, before we,  
2 actually, grant the accreditation.

3 The plan is to have NOP technical  
4 experts on all audits to accompany the ARC  
5 auditors. We are doing, in addition to the  
6 regular audits, we'll be doing some foreign  
7 assessments in Ghana, Argentina, Israel and  
8 India. They are already planned for 2010.

9 And then, we are looking at --  
10 well, we are already implementing increased  
11 accountability for certifiers. So, annual  
12 updates, which are required by all certifiers,  
13 we are insisting that certifiers -- assistants  
14 to certifiers, but we are also insisting that  
15 certifiers follow proper adverse action  
16 procedures. And then, they are also required  
17 to provide a list of certified operations.

18 Now, in the past, certifiers would  
19 not always get their things in on time, so  
20 what we have done is, if they don't get their  
21 reports in on time we issue notices of non-  
22 compliance, and that seems to work. Once they

1 get one of those, they get it in on time. We  
2 see it pretty quickly.

3 So, we are trying to hold  
4 certifiers accountable, to make sure that they  
5 are protecting organic integrity.

6 Recognition agreements, we  
7 assessed Denmark in March, Israel is scheduled  
8 for May. These are the foreign accreditation  
9 or foreign recognition agreements. India is  
10 scheduled for September, and we have a new  
11 application from Thailand that we are in the  
12 process of evaluating.

13 There are six recognition  
14 agreements that the program has, so if  
15 Thailand goes through the process they would  
16 be number seven.

17 Equivalency, we have equivalency  
18 with Canada, mutual assessment of the programs  
19 will occur later this year, so we'll be  
20 working with Canada on a mutual assessment, to  
21 see that their system is equivalent to our  
22 system, and they'll see that our system is

1 equivalent to their system.

2 We are also working with the  
3 European Union. We've expressed an interest  
4 in establishing an equivalency agreement with  
5 the European Union, and we will be conducting  
6 meetings with them later this year to see how  
7 well that proceeds.

8 So, a little bit about  
9 harmonization or this concept of equivalency.  
10 The things that we are looking at, when we are  
11 looking at equivalency agreements, there's  
12 three components, the standards themselves,  
13 the certification requirements, and then the  
14 accreditation systems. So, a lot of times we  
15 focus on the standards, but the differences,  
16 in terms of materials, between the European  
17 system and our system.

18 But, what we are looking at there  
19 in equivalency is that their equivalent  
20 standards, they don't have to be identical.  
21 The materials list does not have to be exactly  
22 identical to have an equivalency agreement.

1                   And, if you look at this, the  
2 materials, there's very limited differences in  
3 organic standards around the world. Sodium  
4 nitrate, of course, antibiotics are looked at  
5 differently. We have some allowance in terms  
6 of tree food production, and they have some  
7 allowance for use in livestock, and then the  
8 way that inert ingredients are looked at is  
9 very different in Europe and the U.S.

10                   Certification requirements is  
11 another thing that we have to focus on and use  
12 equivalency discussions and in harmonization.  
13 What kinds of inspections are required during  
14 that transitional time period, that's  
15 different between Europe and the U.S., and  
16 then the U.S. requires organic system plans,  
17 that's not a European requirement. So, those  
18 things need to be looked at, and then the  
19 accreditation system. Who is doing the  
20 oversight? Is it a private or a government  
21 organization? What's the quality of that  
22 organization in Canada? It's very different

1 than what we have. They have a number of  
2 different evaluation bodies that they've  
3 accepted to do the accreditation work. Here  
4 we have one, we just allow the ARC Branch to  
5 do the audits of the accredited certifiers.  
6 So, we need to evaluate all three aspects when  
7 we are looking at equivalency.

8 So, the benefits of equivalency,  
9 they are especially beneficial to small  
10 producers. Organic producers can have  
11 expanded market access. Small producers are  
12 the ones that really have a hard time with the  
13 additional certifications. They can't afford  
14 those multiple certifications, so we see that  
15 as very beneficial to the smaller producers.

16 Certifiers have less audits. One  
17 audit suffices for providing them both access  
18 to the U.S. and Canadian market, and then  
19 certifiers can choose an accreditation system,  
20 whether it's NOP or CFIA, Canadian Food  
21 Inspection Agency. So, it reduces paper work  
22 and cost.

1           Some of the other things to think  
2 about, in terms of equivalency, though, is it  
3 does have the potential to reduce direct  
4 oversight of certifiers. So, certifiers that  
5 in the past had to be accredited by two  
6 systems are now only accredited by one.

7           Also, the accreditation system  
8 relies on multiple evaluation bodies, rather  
9 than one. So, currently, we have the NOP  
10 accreditation system that oversees all the NOP  
11 accredited certifiers, but with the  
12 equivalency agreement with Canada now we have  
13 all the Canadian accreditation bodies that are  
14 also doing this oversight.

15           And then finally, USDA organic  
16 that you see in the marketplace, it may be NOP  
17 certified, but it also may be certified by  
18 CFIA, and not NOP certified. So, that's just  
19 kind of an odd thing to think about, that USDA  
20 organic in the marketplace could be not NOP  
21 certified.

22           So, but it's equivalent, so it's

1 all good.

2 Okay. State organic programs, a  
3 little update there. Utah has withdrawn from  
4 being a state organic program. They did that  
5 in the wintertime. California is under  
6 review. They've corrected seven out of their  
7 eight findings.

8 One thing to keep in mind with  
9 California State Organic Program, they do have  
10 additional requirements. In California you  
11 are required to be registered with the state  
12 as a certifier, and also as an organic  
13 operation. So, we look at that as additional  
14 requirements in California, and we have not  
15 received any new inquiries from any other  
16 states.

17 Okay. Compliance and Enforcement  
18 Division. A lot of work in this area, in  
19 terms of new and revised procedures, complete  
20 handling procedures. They have a new goal,  
21 and this is a very ambitious goal, to close  
22 cases within 180 days. They have a lot of

1 work to do to get to that goal, but that's  
2 their goal, 180 days to close cases.

3 New enforcement procedures, new  
4 enforcement action follow-up monitoring  
5 procedures, these things have been posted on  
6 the website, I think, at this point. I think  
7 they were posted on Friday.

8 Civil penalty procedures, we are  
9 evaluating NOP's authority. There's a  
10 possibility for a rule change around the civil  
11 penalty procedures in the rule, and  
12 publication of suspensions, revocations,  
13 reinstatements and civil penalties, and we are  
14 also in the process of developing a penalty  
15 matrix. This is taking some of the work that  
16 the NOSB did years ago on the penalty matrix,  
17 and expanding it a little bit.

18 For the last six months, between  
19 October and March, we had 70 complaints that  
20 were carried over from the previous year,  
21 received 86 new complaints, total of 156  
22 complaints. Sixty-two complaints have been



1 closed. We still have 94 complaints.  
2 Eighteen of those complaints are over 270  
3 days, and 16 are over 180 days, so a total of  
4 34 complaints are over 180 days. So, that's  
5 why I'm saying we have a lot of work to do to  
6 meet that goal of 180-day turnaround, and our  
7 average time for case closure is 186 days.  
8 So, lots of work to do there.

9 And, by the way, I will -- this  
10 will -- this Power Point will be posted on the  
11 NOP website, I think, tomorrow, so people will  
12 see that.

13 Okay, so 28 warning letters, one  
14 notice of non-compliance, one case collecting  
15 a civil penalty through settlement agreement,  
16 12 cases resulted in product label changes,  
17 123 product labels were changed, eight cases  
18 resulted in production process changes, 20  
19 cases resulted in website changes, and three  
20 operations became certified. So, they are  
21 doing a lot of work, and there's a lot of work  
22 involved in doing these complaint

1 investigations.

2 Moving on to the Standards  
3 Division, this is the division that does  
4 rulemaking on both the practice standards and  
5 the National List, is working on the NOP  
6 program handbook, both instructions and  
7 guidance, and the National List petition  
8 process.

9 Under development, we talked about  
10 in November the concept of made with organic  
11 and some of what we call misrepresented labels  
12 out there, and we do have a guidance, a draft  
13 guidance, that's in the clearance process  
14 currently. When that is published, there will  
15 be a 60-day comment period. We'll consider  
16 the comments before we come out with the final  
17 guidance. This is guidance, because we -- it's  
18 just clarification of existing rules, it  
19 doesn't require any rule change, and it will  
20 be three components to that draft guidance.

21 One is the use of the term organic  
22 when branding company names on the principal

1 display panels. The use of non-organic  
2 ingredients and made with organic specified  
3 ingredients or food group products, and the  
4 use of a percentage of organic ingredient  
5 statements within the made with organic  
6 labeling category. So, those three components  
7 will be in that one -- in that one piece of  
8 guidance.

9 Okay, the program handbook, we are  
10 looking at this in two different arenas, in  
11 terms of things that we consider instructions  
12 or procedures, which are really directions to  
13 certifiers of how to do the work of certifying  
14 organic operations, and guidance.

15 So, examples of instructions or  
16 procedures would be the accreditation  
17 procedures, the enforcement procedures, the  
18 things that certifiers need to know in order  
19 to do their work.

20 Guidance, there it is more policy,  
21 and it's clarification of the existing rule,  
22 the existing regulation, and those are -- a

1 lot of the NOSB recommendations are what we  
2 would consider guidance, that will go through  
3 this draft guidance procedure.

4 We'll publish them in the Federal  
5 Register with a 60-day comment period, and  
6 they include things like the outdoor access  
7 for poultry and commercial availability of  
8 seeds.

9 Anything that has a potential  
10 economic impact will go through this type of  
11 guidance process through the Federal Register.

12 So, in terms of the handbook, in  
13 terms of the first edition, this is some of  
14 the things that will be included. It's not an  
15 exhaustive list, but these are the types of  
16 things that we will include in the first  
17 edition. Things that were identified in the  
18 OIG findings, the periodic residue testing,  
19 outdoor access for livestock, organic  
20 certificates, that portion of the  
21 clarification on organic certificates that we  
22 can do without doing rule changes, changes in

1 ownership, preventing commingling, non-  
2 compliance procedures, organic system plans  
3 and inadequate records.

4 And then, in terms of the NOSB  
5 recommendations, the commercial availability  
6 of seeds, biodiversity, grower groups, organic  
7 research, compost, chlorine, and private  
8 labels.

9 National List rulemaking, that's  
10 in process, in progress. We are working on  
11 the final rule for sulfurous acid and  
12 tetracycline, working on the final rule for  
13 606, that's an interim rule currently, and a  
14 final rule on the TM-08-06 docket, which  
15 includes potassium silicate, sodium carbonate,  
16 peroxyhydrate, gellan gum, cooking wine and  
17 tragacanth gum. I don't know how to actually  
18 pronounce that, but something like that.

19 And then, there's a number of  
20 proposed rules that we are working on, NOP  
21 0902, 0903, and 0904, lots of different  
22 materials, National List recommendations that

1 the Board has made that we are still working  
2 on the proposed rule.

3 So, when I was here in November, I  
4 was relatively new at the USDA, and I thought  
5 that we could get a lot done. And, we are  
6 getting a lot done. We have a lot of new  
7 staff, but it takes a while. There's a lot of  
8 steps involved in getting these rules done,  
9 and even though we have a lot of new staff  
10 it's going to take them a while to get up and  
11 running.

12 So, I just want you to keep in  
13 mind that we are working hard, but you've  
14 given us a lot of work to do, and we have a  
15 lot to do.

16 Okay, practice standards. So,  
17 same list that you saw in November, marginal  
18 livestock, we do plan to have a proposed rule  
19 out this year, apiculture mushroom,  
20 standardization of certificates, pet food,  
21 aquaculture and greenhouses. So, they are on  
22 the list, but we haven't figured out how to

1 get them done.

2 We have -- the program handbook is  
3 a priority for the Standards Division. We  
4 have a lot of new staff. At some point, we  
5 will start to assign staff to start working on  
6 these practice standards, but we are not quite  
7 there yet.

8 NOSB nominations are now open.  
9 There's five openings for the NOSB, two  
10 producers, two consumer public interest  
11 groups, and one certifier. Nominations are  
12 due by July 17, 2010, and the five-year term  
13 starts in January of next year. So, just  
14 encourage people to apply for these positions,  
15 the work of the Board is really, really  
16 critical to the success of the industry. We  
17 really rely on the Board for guidance and your  
18 recommendations, so anyway, that's happening  
19 currently.

20 So, our plans for next year are  
21 somewhat resource dependent. We do have a \$3  
22 million enhancement in the President's budget.

1 We'll see what happens as it works through  
2 Congress. We hope to have proposed rules for  
3 apiculture, mushrooms, pet food, standardized  
4 certificates and civil penalties, support ISO  
5 accreditation for all NOP accredited  
6 certifiers, so the idea is to get all NOP  
7 accredited certifiers ISO compliant. We want  
8 to align the NOP regulations with ISO Guide  
9 65, expanded oversight of foreign accredited  
10 certifiers, and recognition agreements, and  
11 pursue additional equivalency arrangements.

12 So, if we don't get the additional  
13 funding, the likelihood of getting all these  
14 things done diminishes, even with \$7 million  
15 you can only do so much.

16 Okay, now we get to the part where  
17 we are going to respond to the NOSB  
18 recommendations, and we are going to start  
19 doing a new process, where we'll give you a  
20 written response to your recommendations.

21 The first one is a recommendation  
22 from a few years ago, expiration dates on



1 certificates and standardized certificates.  
2 These are two recommendations. One was made,  
3 I think, November of 2006, and one in  
4 November, 2007, so we have an official  
5 response to that, and, basically, what we are  
6 saying is that we will begin to clarify what  
7 we can through guidance, and then work on  
8 rulemaking changes for the things that have to  
9 be done through rulemaking.

10 So, we accept your recommendations  
11 on expiration dates on certificates and  
12 standardized certificates, and we'll be  
13 working on that.

14 In February, we provided some  
15 clarification on the Sunset Review of how the  
16 NOP views Sunset Review. There were a lot of  
17 discussions in November about whether Sunset  
18 Review was an Evergreen process or not.  
19 Basically, we reject the idea that Sunset  
20 Reviews is an Evergreen process. The Board  
21 has broad authority in terms of Sunset Review,  
22 to renew or reject the continuation of

1 materials on the National List. So,  
2 hopefully, that gave you some clarification of  
3 where the program is, in terms of Sunset  
4 Review.

5 In terms of annotations, there  
6 were a lot of questions about annotations in  
7 November. Your current policy in the NOSB is  
8 that you don't provide for changes to  
9 annotations during the Sunset process, and you  
10 need to abide by your procedures. But, from  
11 the Office of General Counsel, from the  
12 program's position, if you want to consider  
13 changes to annotations that's your  
14 prerogative. The Board has authority to make  
15 changes to annotations during the Sunset  
16 Review process.

17 You may choose not to do that, and  
18 if you choose to do that, you might want to be  
19 very, very careful, because you have such a  
20 large workload to do, that you might want to  
21 be very -- very careful in terms of what you  
22 choose to do.

1                   But, there are some annotations  
2                   that need some work, chlorine in particular.  
3                   The annotation on chlorine is really not  
4                   accurate, and really needs to be looked at.  
5                   So, anyway, that's our opinion.

6                   November, 2009 material  
7                   recommendations for Sunset 2011 and petitions  
8                   and annotation changes, we, basically, concur.  
9                   We will be working towards implementing that  
10                  through rulemaking, all those National List  
11                  decisions that you all made in November.

12                  On Excipients, we concur with  
13                  adding or approved by APHIS, the annotation,  
14                  but we find that your animal healthcare  
15                  products to be a vague term, and we await  
16                  further clarification that I think you are  
17                  working on at this meeting.

18                  Vaccines, our vaccine  
19                  recommendation, we are seeking legal review  
20                  from the Office of General Counsel on that  
21                  particular recommendation, and also a  
22                  technical review to report on the status of

1 GMO vaccines and the economic impact of using  
2 commercial availability criteria for vaccines.  
3 A little more details in our full response to  
4 the Board on that, and these responses to the  
5 Board will be posted on the website tomorrow,  
6 so everybody will have a chance to look at  
7 what our responses to the Board on vaccines  
8 and all these other issues are.

9 The shellfish recommendation is  
10 accepted, we'll be incorporating that into the  
11 aquaculture work.

12 Animal welfare, very important  
13 area. Obviously, more work is needed. You  
14 are doing more work on that at this meeting.  
15 We would like you to consider the impact of  
16 the Pasture Rule on that recommendation animal  
17 welfare, because you did not have the Access  
18 to Pasture Final Rule when you did that work  
19 in November, and we also suggest that you  
20 include transportation and slaughter handling  
21 in the recommendation. That was not included  
22 in your November recommendation, to make it a

1 full animal welfare recommendation we would  
2 encourage you to look at those two areas.

3 Classification of materials, this  
4 is a lot of great work has gone on in this  
5 area, very important, very complex. As being  
6 somewhat familiar with materials review, what  
7 gets really difficult is drawing that line  
8 between synthetic and natural, and I think we  
9 end up spending way too much time trying to  
10 determine whether something is synthetic or  
11 natural, and not just looking at the material  
12 itself. Does it make sense in an organic  
13 system? Does it make sense in biological  
14 agriculture? And, I think sometimes that this  
15 whole concern of whether it's synthetic or not  
16 is really not the issue, it's really how does  
17 that material fit into an organic biological  
18 agricultural system.

19 We do support the two vote system  
20 to clarify decisions, because that's the way  
21 OFPA set up, it is set up in a way that,  
22 first, you have to determine whether it's

1 synthetic or non-synthetic, and then determine  
2 whether or not to prohibit it if it's natural,  
3 or to add it if it's synthetic, or to not add  
4 it if it's synthetic. And, we do believe that  
5 your definitions need some additional work.

6 NOSB policy manual changes, those  
7 changes have been made to the policy manual.  
8 I think that's up on the website now with the  
9 new changes.

10 Retail certification, good work in  
11 that area. It didn't seem that there was any  
12 specific work for the NOP to do on that. It  
13 looked like -- our understanding was we were  
14 going to do additional work on the retail  
15 certification, so there's really nothing for  
16 us to do at this particular time. So, we thank  
17 you for that work, and look forward to more  
18 work in that area.

19 And then, our favorite, or my  
20 favorite, cosmetics, let's go to the next  
21 slide. So, we do have an official response as  
22 a separate memo to the Board on cosmetics.

1                   So, what our plan is, is to  
2                   collaborate with FDA and FTC to understand the  
3                   issues associated with the use of the term  
4                   organic in personal care products. So, we  
5                   have met with FDA, we have another meeting  
6                   next month. It will be collaborative and  
7                   comprehensive approach that will be aligned  
8                   with each respective agency's regulations.

9                   So, they don't really understand  
10                  the NOP regulations. We, certainly, don't  
11                  understand the FDA regulations. Our initial  
12                  meeting with them indicated that there's  
13                  things in the recommendation that conflict  
14                  with FDA regulations. One in particular is,  
15                  they don't really have a category personal  
16                  care products, they don't -- it's not really  
17                  a definition that they relate to, but our plan  
18                  is, is that we will collaborate with them and  
19                  work with them closely.

20                  The other thing that we are  
21                  looking at is gathering information on this  
22                  whole issue, what are consumers' expectations,

1 in particular, around organic labeling of  
2 cosmetics and personal care products, so we  
3 are looking at doing a public survey to try to  
4 gather that information, and we may look at  
5 doing an Advanced Notice of Proposed  
6 Rulemaking, as a way of gathering information  
7 about this area.

8 It's very complex. There's lots of  
9 different claims out there. There's lots of  
10 different standards. We want to be very  
11 careful as we move into this area. We  
12 understand its importance to the integrity of  
13 organic -- of the organic label, but we want  
14 to be very careful and deliberate as we go  
15 through this process of looking at cosmetics.

16 The other thing we are a little  
17 concerned about, in terms of cosmetics, is the  
18 resources that could be devoured in terms of  
19 working in this area. It's a huge area, and  
20 we have a lot of work to do on agricultural  
21 products. So, we are definitely concerned  
22 about that.



1 Deputy Secretary Merrigan is  
2 concerned about that, of not losing sight of  
3 some of the other core work that the program  
4 has to do, but we will move forward in this  
5 area.

6 Okay, so that's the end of my  
7 report. Do you want -- do you have any  
8 questions about that, before we get to Corn  
9 Steep liquor?

10 CHAIRPERSON GIACOMINI: Yes, if we  
11 could -- the Board has some questions.

12 Joe?

13 MR. SMILLIE: Yes. The periodic  
14 residue testing, that's the big ticket item.

15 MR. McEVOY: Right.

16 MR. SMILLIE: We've got to be  
17 really careful with this, so we don't drive  
18 the price of organic beyond the ability of the  
19 consumer to pay, and at the same time keeping  
20 organic integrity. So, we have to move  
21 forward.

22 My first question is, have you

1 received a legal opinion from OGC that the  
2 current regulation does not -- is not in  
3 compliance with OFPA?

4 MR. McEVOY: No.

5 MR. SMILLIE: But, you are moving  
6 ahead as if you would have received that it  
7 seems.

8 MR. McEVOY: Yes, we are moving  
9 ahead, because we believe it's a critical part  
10 of a good comprehensive oversight of organic  
11 agriculture, to improve the integrity of the  
12 whole system, of having pesticide residue  
13 testing as a component to the system is an  
14 important component.

15 MR. SMILLIE: Is there a role for  
16 the NOSB in this -- in the current thinking of  
17 the program?

18 MR. McEVOY: Is there -- in what  
19 way?

20 MR. SMILLIE: Well, is there any  
21 part of this that you want us to start to look  
22 at and work with the public in making this --

1 making your program work? Are we going to be  
2 formally or informally invited to collaborate  
3 on this?

4 Our committee is Certification and  
5 Compliance Enforcement.

6 MR. McEVOY: Right. So, you'd  
7 like to be involved in the development --

8 MR. SMILLIE: I didn't say that, I  
9 just wondered what your intentions were.

10 MR. McEVOY: Yes.

11 MR. SMILLIE: I wasn't asking for  
12 work, I was just, you know --

13 MR. McEVOY: Thanks for the offer,  
14 I think that might be a good thing to work  
15 very closely with your committee on the  
16 development of this program.

17 MR. SMILLIE: Well then, we'll  
18 look forward to seeing what your current  
19 thinking is on it, too.

20 MR. McEVOY: Okay, sounds good.

21 MR. SMILLIE: Does some of that  
22 current thinking include the \$300,000 budget

1 item? Is that --

2 MR. McEVOY: Yes. That's some of  
3 the current thinking, that we would cover the  
4 cost of the residue testing.

5 MR. SMILLIE: That sounds like a  
6 good current thinking, I like that current  
7 thinking.

8 No. 2, I really -- I really --  
9 certify our CFOs back there, you know.

10 MR. McEVOY: Yes.

11 MR. SMILLIE: I really like the  
12 idea of using FAS for foreign oversight. I  
13 think that's a brilliant move. I really think  
14 that we need to pay attention on what the USDA  
15 seal means, not only in the U.S., but all  
16 around the world, and FAS should be able to do  
17 those market surveys, and I think that that  
18 will be great.

19 The HDS codes I think is great. I  
20 really encourage the program to work very --  
21 because that will show where the -- you know,  
22 that's a key one.

1                   No. 3, we are working sort of in  
2 parallel on the made with organic seal. As  
3 you will hear over the next three days, we  
4 floated a discussion paper out, and the  
5 response we got from the sectors was  
6 overwhelmingly pointed. And, I think we'll  
7 share that with you.

8                   You seem to be heading in the same  
9 direction, we need to educate people on that  
10 seal.

11                  Finally, I had a question, you put  
12 something about final 606 rule, and I have no  
13 idea what you were talking about.

14                  MR. McEVOY: Yes, the 606 rule is  
15 an interim rule. It was published as an  
16 interim rule, interim final rule.

17                  MR. SMILLIE: Oh, okay.

18                  MR. McEVOY: So, we will have a  
19 final rule on that.

20                  MR. SMILLIE: So, we are just  
21 going to finalize it, there's no anticipated  
22 changes.

1 MR. McEVOY: No.

2 MR. SMILLIE: Okay.

3 CHAIRPERSON GIACOMINI: All right.

4 Jeff?

5 MR. MOYER: Thank you, Mr.

6 Chairman.

7 Miles, I wanted to follow up on  
8 Joe's comment about residue testing. One of  
9 the concerns that I have is, how we are going  
10 to set up a baseline to compare to, because  
11 when you talk to -- I think we are opening the  
12 door in one regard to the conventional  
13 industry, which has always argued that there  
14 should be a residue testing program, and if  
15 their -- if you test dimensional products side  
16 by side with organic, and the conventional  
17 tests with a lower residue, then their  
18 products should be equal to or greater than  
19 the organic product. And, I'm curious how the  
20 program is going to view the outcome of that  
21 residue testing in light of that argument.

22 MR. McEVOY: Well, I think it's an

1 argument that won't hold true.

2 Washington State Department of  
3 Agriculture, we always did residue testing as  
4 a significant part of our program. And, for  
5 the most part we mostly did field samples, but  
6 we also did processed products and handlers  
7 from grocery stores, from packing sheds, and  
8 most of the time we didn't find any residues.

9 And, when we found residues, then  
10 we wanted to know why are those residues  
11 there. Rarely would we find residues above 5  
12 percent EPA tolerance level, but still you  
13 find residues, and when you occasionally find  
14 those residues you find out why they are  
15 there. Are they there from drift? Are they  
16 there from residual soil contamination? Are  
17 they there because of lack of a breakdown in  
18 the system in a handling facility, where  
19 there's not adequate barriers between organic  
20 and conventional handling?

21 And, in almost all, you know,  
22 well, in most cases the finding of a residue

1 led to improvements of the system. And, by  
2 doing that residue testing, you are -- it  
3 really helps to keep people on their toes,  
4 because they know you are going to be out  
5 there sampling, and occasionally you do find  
6 the fraudulent product that we need to  
7 eliminate from the marketplace.

8 So, I don't think it's going to be  
9 a problem. I think what we'll find is, we'll  
10 actually have the data to show that most  
11 organic food products don't have any residue.  
12 That's been our experience.

13 CHAIRPERSON GIACOMINI: I think  
14 we're borderline getting some feedback. Did  
15 everybody check that their mics are off, if  
16 you are not speaking?

17 Any other questions on this from  
18 the Board?

19 I have a couple that I'd like to  
20 touch on with you, Miles.

21 We are in the middle of Sunset  
22 2012. We are dealing with probably 90 percent



1 of all the substances on the National List in  
2 this block.

3 A number -- one of the things that  
4 we've done in the last six months, since the  
5 November meeting, is to go through that list  
6 and identify the ones which we felt needed a  
7 new TAP review.

8 Could you sort of give us the  
9 current status of the relationship and the  
10 responsiveness of science and technology, in  
11 being able to achieve and accomplish this  
12 before our next meeting?

13 We also, in the submission of the  
14 nanotechnology document, we've -- we are  
15 wondering -- we are concerned that if this  
16 responsiveness is not adequate we are going --  
17 it could create some tremendous problems in  
18 the industry.

19 MR. McEVOY: Yes.

20 CHAIRPERSON GIACOMINI: Or we'd  
21 have to take action without the information.

22 MR. McEVOY: Okay, I'll have

1 Shannon answer the question about the status  
2 of the technical report.

3 MS. NALLY: Shannon Nally,  
4 National Organic Program.

5 There is a considerable amount of  
6 work for Science and Technology to do, to have  
7 the technical report, I guess, ideally  
8 completed by August, so that you can review  
9 those, so that you have time to review those  
10 for the fall meeting.

11 We are considering other  
12 alternatives to supplement Science and  
13 Technology's capacity to be able to handle all  
14 those reports.

15 MR. McEVOY: So, it probably  
16 doesn't give you a lot of confidence. We are  
17 working on it. You've got a lot of requests,  
18 and there's a lot of work to do.

19 CHAIRPERSON GIACOMINI: Does the  
20 program have a plan in place to take that  
21 step, to find that supplemental health if  
22 necessary, and an expectation of what may kick

1 you into that process?

2 MR. McEVOY: Arthur, help me out  
3 here.

4 MR. NEAL: Arthur Neal, National  
5 Organic Program.

6 We are looking at -- we are  
7 looking at touching base -- well, we've  
8 already started touching base with some of the  
9 contractors we have used in the past, to look  
10 at them picking up some of the workload.

11 One of the things we don't want to  
12 see have happen is that our -- well, the  
13 Sunset Review process take longer than  
14 necessary. The OPFA says five years, and if  
15 it's not reviewed in five years you can't use  
16 it.

17 So, if we run up in a situation  
18 where, you know, we don't finish our review,  
19 what alternative do we have, in terms of  
20 extending the use of a substance.

21 So, we are looking -- we've  
22 already started contacting folks, and just, we

1 started a conversation about, you know,  
2 potentially, being able to pick up some  
3 technical reviews.

4 CHAIRPERSON GIACOMINI: Any other  
5 comments for the program on their presentation  
6 or these issues?

7 Okay, seeing none, I think there  
8 is an interim job for you to do right now. I  
9 think you have an introduction to make.

10 MR. McEVOY: Okay. Yes, we have a  
11 distinguished guest here, A.G. Kawamura, from  
12 -- the Director of the California Department  
13 of Food and Agriculture.

14 (Applause.)

15 MR. McEVOY: I first met A.G. in  
16 Seattle at a National Association of State  
17 Departments of Agriculture meeting, and had  
18 the chance to learn that he has an organic  
19 farm, or part of an organic farm, in southern  
20 California, so that was great.

21 So, welcome, thank you.

22 MR. KAWAMURA: Just real quick,

1 welcome to California for everybody who is out  
2 of state, and welcome to this neck of the  
3 woods from people who are around the state,  
4 and I wanted to say thanks for all your  
5 dedication on being a part of this Board, and,  
6 really, trying to make sure that we move the  
7 industry forward.

8 I know there's a lot of jeopardy  
9 to the program, and I'm going to speak a  
10 little bit about that later today, when we get  
11 back over to the Hampton Inn. But, these are  
12 interesting times, where the public confidence  
13 can go quickly one direction or another, and  
14 I know it's more important than ever then to  
15 look for consistency, look for focus on your  
16 vision of where you want to go, and,  
17 certainly, in this arena, with this Board and  
18 with the organic program nationally and in our  
19 state, it requires a lot of attention, a lot  
20 of partnership. So, I wanted to just say  
21 thanks so much for all you are doing for  
22 helping create that kind of consistency and

1 that kind of vision.

2 And, anything we can do as a  
3 state, of course, we are here to help, and we  
4 are here to be a partner with you, and we  
5 continue to look at an amazing rebirth of  
6 agriculture all over our state, and, really,  
7 all over the country, where people are getting  
8 very, very excited about regional food sheds  
9 and the kinds of things that can take place  
10 when you really link a food shed together with  
11 a water shed, and link it together with an  
12 energy shed, interestingly. These are all  
13 nice exciting ways to take a look at what  
14 synergy can do towards building a better  
15 future for ag.

16 So again, thanks so much. I know  
17 you guys have a lot of stuff going on, so it's  
18 just a pleasure to be here, and, more  
19 importantly, I look forward to meeting with  
20 many of you over the next days.

21 Thanks.

22 (Applause.)

1 CHAIRPERSON GIACOMINI: Any  
2 questions?

3 Thank you for visiting us. Thank  
4 you for your time.

5 I think -- what are we up to? We  
6 are up to those two?

7 MR. McEVOY: Are you ready for  
8 Corn Steep liquor?

9 CHAIRPERSON GIACOMINI: The Corn  
10 Steep, yes.

11 MR. McEVOY: Okay. I'll introduce  
12 Dr. --

13 CHAIRPERSON GIACOMINI: A  
14 discussion on Corn Steep and nutrients.

15 MR. McEVOY: -- introducing Dr.  
16 Lisa Brines. She's been with the program for  
17 three weeks. This is her third week, start of  
18 her third week, so be easy on her. She comes  
19 from the Washington State Department of  
20 Agriculture. We stole her from my old place  
21 of employment, and she ran -- well, didn't  
22 run, but was the materials specialist at the

1 Washington State Department of Agriculture.

2 So, thank you, Lisa.

3 MS. BRINES: Thanks, Miles for the  
4 introduction. So, I'm just going to be giving  
5 sort of an overview of Corn Steep liquor  
6 today.

7 There is a technical advisory  
8 report that will be posted on the website, as  
9 well as a White Paper in the next couple of  
10 days, and there is some animation in these  
11 slides, so I apologize. Try and follow me as  
12 best you can.

13 So, in general, to start with,  
14 Corn Steep liquor is a byproduct of the corn  
15 wet milling process, and it's currently been  
16 used as an input, a liquid fertilizer, for  
17 organic crop production. So, this was --  
18 material was brought up at the last NOSB  
19 meeting, there's been some concern over  
20 whether -- what the classification of this  
21 material has been or should be.

22 So, in years past, it's been



1 considered a non-synthetic material, a natural  
2 material, by accredited certifying agents, and  
3 also by OMRI, and as a non-synthetic natural  
4 material it is an allowed input fertilizer for  
5 organic crop production, if that  
6 classification is accurate.

7 So, it was recently reevaluated by  
8 OMRI, and they came to the determination that  
9 it is no longer -- should be considered a non-  
10 synthetic or natural material, but it is  
11 considered synthetic because it's synthetic,  
12 it's not on the National List 205.601, so if  
13 that determination is correct it would not be  
14 allowed as an input for crop production.

15 So, at the last NOSB meeting,  
16 Miles touched on this. There was a policy  
17 notification that was put out in November from  
18 the NOP, saying that until the NOSB looks at  
19 this material to make a determination on the  
20 classification, is that it would be --  
21 continue to be allowed as an input for organic  
22 crop production, as it's been used for a

1 number of years.

2           So, I'm just here today to give  
3 you sort of an overview of what this material  
4 is and where it comes from. So, as I  
5 mentioned, it's a product of the corn wet  
6 milling process, and I'll take you through  
7 probably the simplest flow diagram you'll see  
8 on corn wet milling.

9           So, the incoming corn is initially  
10 soaked in a tank of water, which has some  
11 sulfur dioxide added to it. So, the corn  
12 takes in a bunch of water, and it softens the  
13 kernels, you know, in a couple days at 120 to  
14 130 degrees Fahrenheit.

15           So, the steep water is taken off,  
16 and the corn solids, the stuff that's not  
17 soluble in the water, that's sort of the  
18 purpose for this corn wet milling process, is  
19 to take the corn and separate it into those  
20 four components, the germ, the bran, the  
21 starch and the gluten, to make higher-value  
22 products.

1                   So, the steep water does contain  
2 all the soluble nutrients from the corn, so  
3 soluble proteins, carbohydrates, amino acid,  
4 so it does have some nutrient value.

5                   So, the steep water is evaporated  
6 and concentrated to make what's known as Corn  
7 Steep liquor, or condensed fermented corn  
8 extractives, depending on where you are  
9 looking at it from.

10                  So, the Corn Steep liquor is about  
11 50 percent solid, so it contains a substantial  
12 amount of protein and nutrients and other  
13 materials.

14                  The majority of Corn Steep liquor  
15 from the corn wet milling process is sent to  
16 the conventional livestock feed markets, so  
17 must of it is fed to conventional livestock,  
18 but it is used, a certain portion of it, for  
19 other applications, including, in this case,  
20 liquid fertilizer.

21                  So, Corn Steep liquor is about  
22 maybe 23 percent protein, depending on how

1 it's processed. So, using your rule of thumb,  
2 if you divide it by 6-1/4 it's about 3-1/2,  
3 3.6 percent nitrogen, for the high nitrogen  
4 liquid fertilizer if used as is.

5 So, the remaining parts of the  
6 corn, the solids, the germs, the bran,  
7 everything that's insoluble in that steep  
8 water, goes on for further processing. So,  
9 through a variety of processes, makes more  
10 higher-value products, say your ethanol,  
11 cornstarch, high fructose corn syrup, corn  
12 oil, maltodextrin, dextrose. So, a full  
13 variety of products as shown on that diagram  
14 there.

15 And, as a note, there's an  
16 asterisk next to the cornstarch, and this is  
17 a material that has been previously reviewed  
18 by the Standards Board, and the native, non-  
19 GMO cornstarch is currently listed as an  
20 agricultural product on 205.606, it's been  
21 allowed as a product, when not available  
22 commercially in an organic form.

1                   Okay, so the question of whether  
2                   the Corn Steep liquor is a natural synthetic,  
3                   the reason that OMRI has provided publicing,  
4                   in terms of how they made this decision, is  
5                   that it comes down to the use of sulfur  
6                   dioxide, which is initially added to that  
7                   steep water. So, the very first step in corn  
8                   wet milling is soaking the corn in this water  
9                   solution, that's got sulfur dioxide in it.

10                   So, sulfur dioxide is a gas that's  
11                   soluble in water. So, in solution it forms  
12                   sulfuric acid, it really exists in solution as  
13                   an equilibrium solution between the disulfite  
14                   and sulfite, so that's how you get sulfite  
15                   from sulfur dioxide. So, it's a part of the  
16                   water at .1 to .2 percent.

17                   And so, with the literature view  
18                   of the function, and not all the details are  
19                   known, it's not entirely clear, but it is  
20                   added to the water, first to prevent excessive  
21                   bacterial growth, so that first step, the  
22                   soaking process, it's in a warm environment,

1       it's for a couple days, so it's a good  
2       environment to grow the bad bugs, so it helps  
3       prevent those putrefactive micro organisms  
4       from growing.

5               But, it also serves another  
6       function, which is to help separate the starch  
7       from the insoluble protein, and the way that  
8       does that is by reducing the disulfite bond,  
9       so sulfur dioxide is a good reductant, and it  
10      can help cleave the response to help separate  
11      the starch from the protein for those  
12      components to go on for further processing.

13              So, some of those materials that  
14      were shown on the flow diagram are also  
15      available in certified organic form. So, for  
16      that process the certified organic processors  
17      can't use sulfur dioxide, it's not on the  
18      National List, except for one. So, they have  
19      to use alternatives. So, there are some  
20      materials on 205.605 and 606 that might be  
21      available as alternatives.

22              So, enzymes are an option, lactic

1 acid, that's both non-synthetic, ozone,  
2 there's a research paper out there that  
3 reports that ozone could be a viable  
4 alternative, so that's a synthetic on 605, and  
5 other materials might be used in the  
6 processing of organic corn products that might  
7 be on 605 as well.

8 So, it all sort of boils down to a  
9 couple questions, is the process made --  
10 process that's used for this Corn Steep  
11 liquor, does it make it a synthetic or non-  
12 synthetic process, if it's used sulfur dioxide  
13 during processing?

14 So, OMRI made a decision, if you  
15 look at their latest newsletter, they go into  
16 some detail about how they came to that  
17 conclusion. It wasn't a unanimous decision,  
18 so we are asking for the NOSB to look at this  
19 material.

20 We are not asking for a decision  
21 at this meeting, but after review of the  
22 technical information it's to weigh in on the

1 decision, whether it should be classified as  
2 a synthetic or non-synthetic material.

3 The other part of that question is  
4 that, given that cornstarch, non-GMO  
5 cornstarch, is on 606, is that whether that  
6 production process would also render anything  
7 else that's a product of the corn wet milling  
8 process also synthetic, or whether that  
9 classification would be limited to Corn Steep  
10 liquor.

11 So again, as I mentioned, so we  
12 are asking for a formal recommendation on  
13 whether Corn Steep liquor should be classified  
14 as synthetic or non-synthetic, and not a  
15 decision at this meeting, but at the fall 2010  
16 meeting.

17 So again, if it's non-synthetic,  
18 if that's the determination the Board makes,  
19 it would continue to be allowed as an input or  
20 fertilizer for crop production, but if the  
21 determination is that it is a synthetic  
22 substance, then future use would be prohibited



1 unless it's petitioned and recommended for  
2 addition to the National List.

3 And, I'm happy to answer any  
4 questions that you might have.

5 CHAIRPERSON GIACOMINI: Yes.  
6 First of all, I would just like to remind the  
7 Board that we won't be solving this today.  
8 Please try to, if possible, focus to best  
9 clarify and understand the problem we are  
10 looking at, and I would like to request the  
11 program, in one form or another, either this  
12 presentation or a PDF version of this  
13 presentation, two or three, three to four  
14 slides on a page, whatever, as quickly as  
15 possible.

16 To the Board, do we get that? No,  
17 not that, I want that.

18 MR. McEVOY: We'll be happy to  
19 provide that to you.

20 CHAIRPERSON GIACOMINI: Yes.

21 So, Steve?

22 MR. DeMURI: Thank you for the

1 update. That was very interesting and  
2 helpful.

3 The technical review, is that  
4 going to address some of these other corn  
5 products, like cornstarch, or is it specific  
6 to Corn Steep liquor?

7 MS. BRINES: It's, primarily,  
8 specific to Corn Steep liquor.

9 MR. DeMURI: Because it appears  
10 that this is going to have ramifications for  
11 handling as well, and would it be possible to  
12 get a technical review for the other -- the  
13 other corn products as well, as quickly as  
14 possible?

15 MS. BRINES: That's a good  
16 question.

17 I'll mention the technical report,  
18 the original one on native cornstarch, does  
19 mention the use of sulfur dioxide. The  
20 reference that the reviewer made on the form,  
21 which is available on the petition substance  
22 database, is that the sulfur dioxide is added,

1       it's a temporary preservative to avoid  
2       putrefaction, I think is what was said.

3                   MR. DeMURI:   Okay.   We'll go back  
4       and review that.

5                   CHAIRPERSON GIACOMINI:   Tine?

6                   Or, Miles, do you have a  
7       statement?

8                   MR. McEVOY:   Yes, we'll try to  
9       provide you with the information that you need  
10      to make a good decision.   So, you are looking  
11      for more information about how other products  
12      are made through the wet milling process, and  
13      we'll see what we can do in terms of  
14      gathering that information for the Handling  
15      Committee.

16                  MR. DeMURI:   That would be  
17      helpful, thank you.

18                  CHAIRPERSON GIACOMINI:   Yes, I  
19      think, Miles, in some cases, in the requesting  
20      of those technical reports, it comes down to  
21      the question asked.   If the question is, Corn  
22      Steep liquor in relation to -- as a crop

1 input, it would be completely -- we'd need to  
2 request another one for the Handling Committee  
3 to look at and consider what that might mean  
4 for them.

5 Tine?

6 MS. ELLOR: Yes, so where we left  
7 this on the Crops Committee is, we -- we had  
8 a meeting partly devoted to the sufficiency of  
9 the technical review, and as a committee we  
10 pretty much reached a consensus. John is our  
11 point guy on Corn Steep liquor, he might have  
12 more to say about this, but we found it not to  
13 be sufficient, and we do have additional  
14 questions, which we were waiting to forward  
15 until we, you know, heard your presentation.  
16 So, that's where it stands now.

17 And, Hoe just mentioned that  
18 possibly we might need to collaborate on this  
19 between the two committees, and maybe have a  
20 joint meeting or two. So, that might be  
21 somewhere we want to go.

22 So, we will get those questions

1 together, dig them out of our archive, and  
2 send them back to you.

3 MR. McEVOY: The other thing that  
4 we heard from the Board is requesting that the  
5 NOP have a staff person for each of the  
6 committees, and we are in the process of  
7 implementing that.

8 So, you will have a point person  
9 for each of the committees to work with, and  
10 can help to coordinate this information that  
11 you need on Corn Steep liquor.

12 CHAIRPERSON GIACOMINI: And, you  
13 know, to follow up what Tine is saying, you  
14 know, looking down the road, down the road,  
15 there could certainly also be possibilities of  
16 having an impact on livestock.

17 So -- any other comments on this  
18 topic?

19 Seeing none, move on to the next  
20 topic.

21 MS. BRINES: Thank you.

22 MR. McEVOY: Okay. We also have a

1 memo for you on nutrient vitamins and  
2 minerals.

3 Okay, we might as well just --  
4 just go to the next slide, see what happens  
5 here.

6 Okay, 1995, the NOSB made a  
7 recommendation that upon the implementation of  
8 the National Organic Program, the use of  
9 synthetic vitamins, minerals and/or accessory  
10 nutrients in products labeled as organic must  
11 be limited to that which is required by  
12 regulation, or recommended for enrichment and  
13 fortification by independent professional  
14 associations.

15 So, the Board worked on this many  
16 years ago, 1995, and then the next slide,  
17 these are the regulations that were put into  
18 place in relationship to that particular  
19 recommendation. 7 CFR 205.605(b), nutrient  
20 vitamins and minerals, in accordance with 21  
21 CFR 104.20, nutritional quality guidelines for  
22 foods. So, that's the reference.

1           So, the question is, partially,  
2           what does that mean? What does that reference  
3           on the National List mean?

4           In 2006, the NOP received a  
5           complaint alleging violations of the National  
6           Organic Standards for certified organic  
7           products that contained accessory nutrients.

8           The NOP determined at that time  
9           that accessory nutrients were allowed, based  
10          on an interpretation of 7 CFR 205.605(b), 21  
11          CFR 104.20, and passed NOSB recommendations.

12          That NOP determination was never  
13          publicly disseminated, and it was not done  
14          through a transparent process. It was a  
15          letter to a certifier, or a letter to a  
16          certifier to a party.

17          So, nutrient vitamins and  
18          minerals, as I already said, nutrient vitamins  
19          -- the reference is nutrient vitamins and  
20          minerals, in accordance with 21 CFR 104.20,  
21          nutritional quality guidelines for foods. What  
22          does that mean?

1           First of all, that if that states  
2           that only vitamins and minerals are allowed,  
3           nutrients that are not vitamins or minerals  
4           are not referenced in the National List. So,  
5           if you look at how that's written, it doesn't  
6           say nutrients, vitamins and minerals, it says  
7           nutrient vitamins and minerals. So, vitamins  
8           and minerals are allowed, but other nutrients  
9           are not listed.

10           So, in 205.605(b), it references  
11           the FDA regulation 21 CFR 104.20, and under D3  
12           there's a specific list of substances, that  
13           includes a number of vitamins and minerals,  
14           and also protein, and protein is not a vitamin  
15           or a mineral, so, therefore, it's not -- is  
16           not referenced by the National List. Okay.

17           Then there's the question comes  
18           down to another part of 21 CFR 104.20, which  
19           is (f), which states that nutrients may be  
20           added to foods as permitted or required by  
21           applicable regulations established elsewhere  
22           in this chapter. And, that's kind of the part



1 that the NOP kind of hung its hat on, in terms  
2 of saying, okay, accessory nutrients, it's  
3 kind of part of the NOSB recommendation. This  
4 is saying other chapters, other parts of the  
5 FDA regulations, so, therefore, it kind of  
6 opened it up to many other materials.

7 We recently consulted with FDA,  
8 Office of Nutrition Labeling and Dietary  
9 Supplements, and we learned that that  
10 interpretation was incorrect, that according  
11 to FDA that 21 CFR 104.20(f) includes only  
12 nutrients that are listed in 104.20(d)(3),  
13 except for foods with a standard of identity,  
14 21 CFR, 130 through 169, which includes things  
15 like enriched flour.

16 21 CFR 104.20 does not include  
17 fatty acids, like DHA and ARA, taurine,  
18 choline, carnitine, phytochemicals. It does  
19 not include nutrient vitamins and minerals  
20 used in pet food.

21 FDA does not define accessory  
22 nutrients. Accessory nutrients are not on the

1 National List. So, we have an issue here.

2 So, what we plan to do, first of  
3 all, our previous interpretation was  
4 incorrect, nutrient vitamins that we had  
5 previously allowed, or believed that were  
6 allowed under 205.605(b) was incorrect. We  
7 recognized that many certifiers, and certified  
8 operations, have made business decisions based  
9 on that 2006 NOP interpretation. We plan to  
10 public draft guidance later this year that  
11 will clarify that the FDA interpretation of 21  
12 CFR 104.20, that only nutrient vitamins and  
13 minerals listed in 104.20(d)(3), and those  
14 with standards of identity in 21 CFR Parts 130  
15 through 169, are allowed under the NOP  
16 standards. Okay?

17 We plan to provide a transition  
18 time for businesses to reformulate their  
19 products to comply with the regulations as per  
20 the FDA interpretation.

21 The draft guidance will be  
22 published in the Federal Register with a 60-

1 day comment period for the draft guidance, and  
2 then we will publish final guidance after  
3 considering the comments received.

4 We request that the NOSB  
5 reevaluate the recommendation for nutrient  
6 vitamins and minerals, or what's also been  
7 called the accessory nutrients recommendation,  
8 during the 2012 Sunset process. We understand  
9 this might add a lot of work to your workload.

10 And then in the future, the NOP  
11 will not be making policy decisions in  
12 letters.

13 (Applause.)

14 MR. McEVOY: The plan is, all  
15 policy decisions will be handled through the  
16 Federal Register and in compliance with  
17 Executive Order 12866, and the NOP advises  
18 companies that they may petition to add  
19 substances to the National List, including  
20 nutrients, vitamins and minerals that are not  
21 allowed under 21 CFR 104.20.

22 So, there's a lot of products out

1       there that have these substances in them, and  
2       our understanding, in consultation with FDA,  
3       is that was an incorrect interpretation of the  
4       standard. So, there's -- we will provide  
5       plenty of time for businesses to make the  
6       changes, plenty of time for the NOSB to  
7       respond to petitions that I'm sure you will  
8       receive, to adding additional substances to  
9       the list, but FDA's clarification, as 104.20,  
10      is a very limited list of substances that are  
11      allowed. It's not this broader arena of  
12      substances that has been kind of allowed by  
13      certifiers and businesses over the last number  
14      of years.

15                   And, I think that's kind of the  
16      summary of nutrient vitamins and minerals. We  
17      have a technical report on this, and we have  
18      a memo to the Board that will be posted on the  
19      website tomorrow, press release is going out  
20      on this tonight. Deputy Secretary Merrigan,  
21      I think, is speaking to Wall Street Journal  
22      about this this evening.

1                   CHAIRPERSON GIACOMINI: Relative  
2 to the question that we are trying to  
3 understand, Katrina?

4                   MS. HEINZE: Similar to the Corn  
5 Steep liquor, would it be possible for us to  
6 have a copy of the presentation in addition to  
7 the memo?

8                   MR. McEVOY: Yes.

9                   MS. HEINZE: Thank you.

10                  CHAIRPERSON GIACOMINI: Tracy.

11                  MS. MIEDEMA: Yes, Miles, what  
12 does reevaluate the recommendation mean here,  
13 where you say reevaluate the recommendation  
14 for nutrient vitamins and minerals? Are you  
15 talking about an expedited five-year  
16 sunset period?

17                  MR. McEVOY: Well, on the Sunset  
18 Review, nutrient vitamins and minerals is on  
19 the list, and what it references is specific  
20 substances, vitamins and minerals under  
21 104.20.

22                  So, you want to look at that, and

1 is that -- is that the substances that you  
2 want to be the reference for the materials  
3 that -- the substances that are allowed in  
4 organic foods, or do you want to reconsider  
5 that to -- to look at things beyond that short  
6 list of vitamins and minerals?

7 So, you want to look at what the  
8 National List says, what's included in that  
9 list, what the meaning of 21 CFR 104.20 is,  
10 and then go back to the 1995 recommendation  
11 and say, okay, are those things aligned? If  
12 they are not aligned, how do we make them  
13 aligned, or do we want to change our  
14 recommendation to include other things beyond  
15 what's listed in 104.20.

16 MS. MIEDEMA: So, you are not  
17 making a suggestion about this sunseting  
18 cycle, this is just for the next one?

19 MR. McEVOY: No, we are making a  
20 suggestion about this sunseting cycle.

21 MS. MIEDEMA: For this one, okay.

22 MR. McEVOY: This is a -- this is

1 a big deal. This is going to take a lot of  
2 your time to take a look at this.

3 It may require even additional  
4 meetings to take a look at this. There's a  
5 lot of products that include substances beyond  
6 what is in 104.20.

7 MS. MIEDEMA: Thank you.

8 CHAIRPERSON GIACOMINI: So, where  
9 -- Joe?

10 MR. SMILLIE: In publishing our  
11 first Sunset Review of this, we said that we  
12 were taking into account the current thinking  
13 of the NOP on this. And, what you are clearly  
14 telling us is that, your thinking on this has  
15 changed, and now this is your thinking.

16 So, if we move forward on this  
17 Sunset item next meeting, basically, we have  
18 to reference this document and not any  
19 previous documents.

20 MR. McEVOY: Yes, it's not my  
21 thinking, it's FDA's clarification of what the  
22 actual meaning of 104.20 is.

1                   So, if we are going to reference  
2 another agency's regulations, we better make  
3 sure that we understand what they are, to make  
4 sure they are -- they are what the intent of  
5 the NOSB is, in terms of those substances that  
6 should be on the National List.

7                   CHAIRPERSON GIACOMINI: Valerie?

8                   MS. FRANCES: I just wanted to  
9 remind folks that, just as in November, when  
10 Miles made this presentation we posted on the  
11 website, this will also be posted on the  
12 website. So, you are asking for an official  
13 copy, it will be posted up there for the  
14 public for everyone as it is.

15                  CHAIRPERSON GIACOMINI: Steve.

16                  MR. DeMURI: Is there a technical  
17 review for this subject that will delve into  
18 it in a little more detail?

19                  MR. McEVOY: Yes, there is a TAP  
20 review that's going to be published, will be  
21 on the website tomorrow.

22                  I think -- do they have a copy of



1 that? Did we bring copies for the Board? No.  
2 It will be up on the website tomorrow.

3 CHAIRPERSON GIACOMINI: Okay.

4 MR. McEVOY: I think -- did we --  
5 is this one of the ones that the Board has  
6 seen the drafts of the accessory nutrient TAP  
7 review?

8 MR. FELDMAN: No.

9 MR. McEVOY: The Board has not,  
10 okay.

11 CHAIRPERSON GIACOMINI: So, where  
12 we stand on this one right now is, according  
13 to our current Board policy for Sunset is,  
14 reviewing the current listing under -- within  
15 the current interpretation, correct?

16 MR. McEVOY: Under the FDA  
17 interpretation of what's included.

18 CHAIRPERSON GIACOMINI: Right.

19 And then, after that, or possibly  
20 in the same time frame, and it's something  
21 that I don't want to get into right now  
22 because of time, but I would like us to put on

1 the list to sit down and really look at where  
2 petitions can come from.

3 You previously made a mention of  
4 the chlorine annotation. If the program  
5 really had a problem with the chlorine  
6 annotation, you know, it seems like there  
7 should be a mechanism where you can feed that  
8 back to the Board, and the Board can look at  
9 it.

10 MR. McEVOY: Yes, we'll get there.

11 CHAIRPERSON GIACOMINI: That's the  
12 value of saving the Board all the potential  
13 work of opening up that annotation process  
14 during Sunset, but the petition process to  
15 change annotation has to be a functional  
16 process, and a better understanding, I think,  
17 on all sides would be helpful.

18 MR. McEVOY: Yes, I think that's a  
19 good point, Dan. I think maybe that -- the  
20 reason why the chlorine thing comes up is  
21 because we are -- there's an NOSB  
22 recommendation on chlorine, to provide

1 clarification on what the meaning of the  
2 listing is in the National List, and we are  
3 working on that to implement those NOSB  
4 recommendations as part of this program  
5 handbook. And, we're seeing, wow, the way  
6 this is written it's really kind of quirky.

7 So, I think you just -- that idea,  
8 of let's do that through working with the  
9 Board, not through the Sunset process, but if  
10 we find that there needs to be maybe changes  
11 to an annotation, we can bring it to the Board  
12 and work it through a different mechanism than  
13 just through the Sunset process.

14 CHAIRPERSON GIACOMINI: Because  
15 like you said, dealing with the problem of the  
16 way it's specifically listed could go way  
17 beyond you being able to get it posted before  
18 it expires.

19 MR. McEVOY: Right. Yes, that's a  
20 good point.

21 CHAIRPERSON GIACOMINI: Any other  
22 questions? We have Miles on the hook and on

1 the microphone, any other questions for the  
2 program from members of the Board at this  
3 time?

4 MR. McEVOY: Yes, the memo that we  
5 have is -- goes into a lot more detail on the  
6 background on this nutrient vitamins and  
7 minerals that both the TAP review, the  
8 technical report on it, and the memo to the  
9 Board. I think we just passed out the memo to  
10 the Board, and that also will be posted  
11 tomorrow.

12 CHAIRPERSON GIACOMINI: Jay.

13 MR. FELDMAN: Yes, let me change  
14 subjects here for a second.

15 The memo dated April 19th, the  
16 allowance of green waste in organic production  
17 systems, I have a process question, and then  
18 a substantive one.

19 Is this considered a final  
20 interpretation of the, I guess, I mean this is  
21 just sort of a systemic issue, but it's  
22 specific to bifenthrin and compost, would this

1 be an official -- what standing does this memo  
2 have in terms of interpretation of this  
3 current or existing situation, as well as  
4 future?

5 MR. McEVOY: Yes, the bifenthrin  
6 issue came up last year, where compost was  
7 tested in California, and it ended up with  
8 three municipal waste composts, green waste  
9 composts that were prohibited due to  
10 bifenthrin residues.

11 We discussed this in November. We  
12 sent out a draft policy that would have  
13 established a tolerance level that was  
14 something like 5 percent of the EPA tolerance  
15 level, or at the EPA tolerance level for the  
16 lowest -- the lowest tolerance level set for  
17 that particular compound, bifenthrin.

18 We got feedback from -- mostly  
19 from accredited certifying agents, and also  
20 from OMRI, from some scientific organizations,  
21 I guess. And so then, based on all that  
22 information, we came out with these

1 instructions on what certifiers -- what  
2 certified operations need to look at when they  
3 are looking at green waste and green waste  
4 compost.

5 That's what they are, they are  
6 instructions to certifiers and certifying  
7 agencies, of how they can look at green waste  
8 and green waste compost.

9 We will be putting that into the  
10 program annual that will be going into a  
11 guidance type of document, that there will be  
12 the opportunity for public comment. But,  
13 because of the prohibition on those three  
14 compounds last year, and looking into the --  
15 looking into the issue and lots of questions  
16 coming into the program about what's the  
17 status of pesticide residues in green waste  
18 compost, we felt like putting out those  
19 instructions to certifiers was necessary.

20 But, we will be putting that also  
21 into the guidance, the draft guidance that  
22 will go out in the summer.

1                   MR. FELDMAN: Appreciate that, and  
2           I think the opportunity for public comment on  
3           this is critical. For me, this is one of  
4           those integrity issues, given that my view of  
5           the unavoidable residual contaminant is -- and  
6           I think if you look at the history, the  
7           legislative history on the phrase in the  
8           Statute, that there was not an intent for an  
9           ongoing pesticide registration to contribute  
10          to ongoing contamination, but rather, that  
11          there were residuals that were remaining in  
12          the environment from previous uses of now  
13          canceled or banned materials.

14                   And so, I realize that this has  
15          implications for ongoing uses of composted  
16          materials, which I think we have to deal with,

17                   But, my hope is that we can  
18          somehow influence the registration program of  
19          these pesticides, you know, the pesticide  
20          registration issues, so that we are not seeing  
21          off target contamination and residual  
22          contamination on an ongoing basis, and

1 accepting that as part of organic production.

2 So, I hope there's a public  
3 comment period, where we can maybe flesh out  
4 some of these issues and bring some of the  
5 core values of the organic program over to the  
6 EPA registration program, so that we are not  
7 allowing chemicals used on the conventional  
8 side to contaminate products that we need in  
9 organic production.

10 MR. McEVOY: Right, and the  
11 instructions do not provide for contamination  
12 of soils, crops or water by green waste or  
13 green waste compost, that makes it clear in  
14 the instructions that if there is a  
15 contamination of the soil, or the crops, or  
16 water, because of the application of green  
17 waste or green waste compost, that would be a  
18 violation.

19 The evidence is, is that there is  
20 no contamination, in terms of the testing that  
21 has occurred. You can test and find the  
22 bifenthrin in the compost, but once it's



1 applied and incorporated into the soil it  
2 dissipates, it degrades, it's not present.

3 MR. FELDMAN: Thank you.

4 CHAIRPERSON GIACOMINI: Thank you,  
5 Jay.

6 I realize we are pushing time, but  
7 since I have you in this position, Miles, I  
8 can't quite let this one go, and I'll try and  
9 be as evasive as possible.

10 You brought up a lot of issues in  
11 the yeast statement. We've discussed some of  
12 those as a personal individual, not as a Board  
13 member, not with Board discussions, but there  
14 are a lot of issues, a number of issues that  
15 are brought up in that document.

16 Do you have any further statement  
17 that you would like to make on that?

18 MR. McEVOY: On yeast? Well, I  
19 think we issued that for -- to close out a  
20 complaint. There is an old complaint that we  
21 had, that we were unable to close.

22 We have Office of Inspector

1 General that's saying that you have these old  
2 complaints, you've got to deal with them, you  
3 got to close them out. So, it was a way to  
4 clarify, a way of not requiring organic yeast  
5 for livestock production, but not preventing  
6 organic yeast from being produced.

7 So, we felt that it was a  
8 compromise and a need for clarification, that  
9 there is organic yeast, it is accepted in the  
10 world market, why not just accept it here.

11 So, that's why we did that.

12 CHAIRPERSON GIACOMINI: Anything  
13 else for the program?

14 Thank you, Miles, very much.

15 MR. McEVOY: Thank you.

16 (Applause.)

17 CHAIRPERSON GIACOMINI: We have  
18 one further presentation on this afternoon's  
19 agenda. We are already pushing a two hour  
20 break -- two hour time frame, normally, in an  
21 hour and a half we'll, generally, take a brief  
22 break.

1                   Does anyone -- is anyone  
2 interested in that, or do we just proceed on?

3                   Seeing some extreme hesitation,  
4 but no major statements, proceed on.

5                   Chairman of the Materials  
6 Committee, Katrina, would you please make your  
7 Materials presentation?

8                   MS. HEINZE: Thanks for that fine  
9 send up. There's nothing like having to do  
10 the Materials presentation at the end of the  
11 day, especially, following a very good  
12 presentation by the NOP.

13                   So, with that, it has become the  
14 practice over the last several years for the  
15 Chair of the Materials Committee to do a  
16 refresh on the National List and our role with  
17 regards to that Lists, as the NOSB.

18                   So, since I'm the only thing  
19 standing between folks and work or  
20 entertainment, I'll see if I can proceed  
21 quickly through this.

22                   So, there are some perennial

1 topics that are on this -- part of this  
2 presentation, and then there are some final  
3 notes that I'll include.

4 Okay, so just a reminder about the  
5 National List. There are six sections. For  
6 crops and livestock there are two sections for  
7 each, one that is synthetic substances allowed  
8 for use in production, and a second that is  
9 non-synthetic substances that are prohibited.

10 So, important to note for crops  
11 and livestock is that non-synthetic, or  
12 natural substances, are allowed, unless they  
13 are on the prohibited portion of the National  
14 List.

15 Things are a little bit different  
16 for handling, which also has two sections of  
17 the list, but everything that is used that is  
18 not an organic ingredient must be on the  
19 National List.

20 So, the two sections for handling  
21 are one that is non-agricultural, non-organic  
22 substances, which are allowed, and the second

1 is non-organically produced agricultural  
2 products that are allowed.

3 That second list, 606, is unique  
4 on the National List, in that commercial  
5 availability applies to it. So, for a handler  
6 to use the materials on 606, they must  
7 demonstrate to their certifier at the time of  
8 their certification audit that the  
9 agricultural material is not available in  
10 organic form commercially on the market.

11 Okay, so the material review  
12 process, we have a robust material review  
13 process. It is used to add a new listing to  
14 the National List, to change annotations to an  
15 existing listing, or to remove a material  
16 currently on the list, and there are  
17 guidelines available through a Federal  
18 Register Notice, as well as in our policy  
19 manual.

20 The material review process is a  
21 minimum of 145 days. I could not emphasize  
22 enough that is a minimum process, certainly

1 not a maximum process, and it does not include  
2 time for rulemaking, so this is just to get  
3 you to an NOSB recommendation.

4 What should be emphasized is, the  
5 time frame is dependent on the completeness of  
6 the petition on initial submission, that  
7 varies widely, and very definitely on the  
8 manpower within the specific reviewing  
9 committee and the Board overall.

10 My experience says this time frame  
11 is getting longer as time passes, because we  
12 have more things on our work plans and more  
13 Sunset materials.

14 There is also a time frame  
15 relative to NOSB public meetings, and  
16 completion and review of the technical  
17 reviews, and how long it takes us to get those  
18 back in a complete form.

19 And, I know this is an eye chart,  
20 and I apologize for that, but to try to boil  
21 the material review process down to one page  
22 there's four steps, with really kind of a gap

1       between number two and number three.

2                       So, the first step, a petition is  
3       sent to the NOP. The NOP does a review to  
4       ensure that they have all the information they  
5       need, and it is complete.

6                       If it's determined not to be  
7       complete, the NOP will send that back to the  
8       petitioner. If it is determined to be  
9       complete, that is forwarded to me, the NOSB  
10      Materials Chairperson.

11                      There's a minimum of 14 days, but  
12      again, this is very dependent on what else is  
13      on the desk of the person receiving that  
14      petition.

15                      Once I receive it, I forward it to  
16      the appropriate NOSB committee chair, whether  
17      that be Crops, Livestock or Handling. The  
18      NOSB then does a second completeness and  
19      sufficiency review, and determines if there's  
20      additional information they need, whether it  
21      be a standard technical review, or whether  
22      they have specific questions that they need.

1                   So, it's just kind of the  
2                   committee review.

3                   At that point, if additional  
4                   information is needed, it goes into what  
5                   should have been a big, kind of, yellow dot  
6                   that says, wow, this could take a really long  
7                   time, but that's gathering of technical  
8                   information.

9                   Once all that technical  
10                  information has been acquired you go to step  
11                  three, which is that NOSB goes through a full  
12                  review of the technical information, using the  
13                  technical review, the petition, and they issue  
14                  a recommendation, on which we receive public  
15                  comment prior to an NOSB meeting.

16                  And then finally, at the NOSB  
17                  meeting, there's full Board discussion of  
18                  those committee recommendations, further  
19                  comment from the public, and action by the  
20                  full NOSB.

21                  So, that's kind of the whole  
22                  process in a nutshell.



1           I wanted to emphasize, this  
2           question does come up periodically, that if  
3           folks in the public do have comments that they  
4           want to forward to the NOSB, those need to go  
5           through the National Organic Program. They  
6           should not be sent to individual Board  
7           members. And, that's so we can make sure that  
8           the information gets to the right folks. So,  
9           please, continue to do that.

10           I'm going to briefly go over the  
11           National List criteria. So first, in general,  
12           the general criteria we would look at to put  
13           something -- or as we consider putting  
14           something on the National List, whether it be  
15           something that's allowed or prohibited, we  
16           are going to look at interactions with other  
17           materials used in an organic farming system,  
18           an emphasis on the effect to the environment,  
19           including contamination during manufacturing,  
20           the effect of the substance on human health,  
21           animal health, and then interactions within  
22           the agroecosystem, and then finally, we are

1 going to look at what alternatives already  
2 exist, whether those be specific practices  
3 that would make use of that material not  
4 necessary, or other materials. And then, its  
5 compatibility, which is a subjective thing,  
6 but the role of those of us on the Board.

7           Okay, for a processing aid or  
8 adjuvant, there are other specific things that  
9 come from 205.600(b). Here you would look at  
10 whether the synthetic substance cannot be  
11 produced from a natural source, and there's  
12 not an organic substitute, how the substance  
13 is manufactured. Again, its effect on the  
14 environment and human health, whether it's  
15 recognized by FDA as generally recognized as  
16 safe, and whether or not it is essential.

17           Specific to the handling materials  
18 on 205.606, so these are the agricultural not  
19 commercially available as organic. We look  
20 at two factors. Why should the substance be  
21 permitted in production or handling, so is it  
22 essential, and then second, what information

1 exists on the fragility of supply?

2 We get muddled up on the second  
3 one sometimes. This doesn't mean that,  
4 perhaps, there's not a little bit of it  
5 available, but that over time it may or may  
6 not be available, whether that be to weather  
7 factors, or regional factors, the number of  
8 suppliers that exist, up to and including  
9 things like wars, trade barriers, things like  
10 that. So, whatever it is that would make the  
11 supply fragile.

12 Okay, Sunset Review criteria. I  
13 know that this topic is up for discussion for  
14 us as a Board. I'm going to focus on what our  
15 current process is.

16 As we all know, all the exemptions  
17 to the organic rule, and the National List, as  
18 exemptions to that rule, need to be reviewed  
19 every five years.

20 What we want to focus on is that  
21 these National Listings were accepted by  
22 Boards such as us, because there was evidence

1 for that Board that the material was found not  
2 be harmful to human health or the environment,  
3 the material was necessary because of  
4 unavailability of a wholly non-synthetic  
5 alternative, and use of the material was seen  
6 as being consistent and compatible with  
7 organic practices.

8 So, Sunset is our opportunity to  
9 revisit whether that exemption, that material,  
10 should continue in the rule.

11 So, we would vote to Sunset if it  
12 determines that those conditions that were  
13 relevant to accepting the exemption have  
14 changed, or rather we would change -- we would  
15 Sunset the material off if those original  
16 conditions had changed, or if review finds  
17 that those conditions still exist, then the  
18 material is listed for another time.

19 The Sunset Review process is not  
20 where we add new substances to the List.  
21 Currently, we have not been changing  
22 annotations during it, and it's not the time

1 to re-interpret information that hasn't  
2 changed.

3 So, any of those issues would be  
4 dealt with during our petition process.

5 In previous presentations, there's  
6 a been a list of all the materials. I thought  
7 given the lateness of the hour, I would skip  
8 that. I'm pleased I did that, given how much  
9 everyone wants to listen to us.

10 So, summary of active petitions,  
11 the Chairs of the Crops, Livestock and  
12 Handling folks will do that during their  
13 presentations if they have materials that they  
14 want to highlight for you. We only have one  
15 petitioned material on our agenda, that's  
16 methionine, which is the change of annotation  
17 that's for this meeting.

18 For Sunset 2011, you can see the  
19 Federal Register Notice. I have it listed  
20 there, and that is true for 2012 as well.

21 Final notes, okay, I have three  
22 topics that I've been asked by various members

1 of the Board to talk about before we wrap up  
2 tonight.

3 So, first one, the first one is  
4 public comment. This is really a review of our  
5 public comment process. It's on  
6 regulations.gov. That was implemented to make  
7 sure that there's an effective and equal way  
8 for folks from the public to give us public  
9 comment.

10 I wanted to, particularly,  
11 highlight for the public, and we'll talk about  
12 this several times during this meeting, that  
13 the Sunset 2012 Federal Register Notice, due  
14 to some procedural hiccups, came out later  
15 than we would have liked, and we are very well  
16 aware that that public comment period closes  
17 after this meeting. So, we didn't want you to  
18 think we were ignoring that.

19 It is our intention to continue  
20 with our debate and vote on the materials on  
21 our agenda at this meeting. We will then be  
22 monitoring and reading all the public comment

1 submitted to the Sunset 2012 Federal Register  
2 Notice that will done by the appropriate  
3 committees.

4 At our fall meeting, we will then  
5 affirm the votes that we took at this meeting,  
6 so that we have a transparent public record  
7 that we have read those public comments.

8 If there are materials for which  
9 we receive public comments that would cause us  
10 to relook at the vote we took at this meeting,  
11 those materials will be pulled back at the  
12 discretion of the appropriate committee. We  
13 will not take an affirmation vote, and those  
14 materials will be directed back to their NOSB  
15 committee. So, we are very committed to  
16 reading those public comments, and believe  
17 that we have a process that we will talk about  
18 more this week.

19 That's it on public comment,  
20 unless there's questions from Board members.  
21 Okay.

22 Classification of materials, as

1 you know we've been working very hard and long  
2 on this topic.

3 I just wanted to highlight that  
4 there are some procedural upgrades that we've  
5 implemented as a result of that, and I thank  
6 the Policy Committee for formalizing, or  
7 having a recommendation that would formalize  
8 the first of these. We are going to go back  
9 to a historical Board practice of taking two  
10 votes for materials, so, fortunately, we don't  
11 have that on this meeting's agenda, but,  
12 certainly, at our fall meeting, so I would  
13 remind the chairs of the Crops, Livestock and  
14 Handling Committees, that your recommendations  
15 for the fall meeting should have two votes on  
16 them, not one, how is it classified, and then  
17 should it be allowed or prohibited.

18 Now just a reminder, I'll remind  
19 you of that as the summer proceeds.

20 Use of annotations, again, a  
21 reminder as you review those materials, we  
22 want to thoughtfully use annotations as needed



1 to clarify the material's source and process  
2 that you reviewed.

3 So, just some thought starters, as  
4 you think about that. Does the material  
5 resulting from that annotation exist in the  
6 marketplace? That's one of the questions that  
7 has come up, is that we don't want to place an  
8 annotation on a material, and, therefore, have  
9 a theoretical material on our list.

10 Is the annotation realistic? And  
11 then, can ACA's reasonably verify that that a  
12 specific material meets the annotation?  
13 That's something that we've heard from the  
14 certifiers quite a bit, that, you know, at the  
15 end of the day they are the ones who have to  
16 make sure that producers and handlers are  
17 meeting the regulations, so they need to be  
18 able to verify it in some reasonable way.

19 Finally, technical reviews of  
20 materials, just a reminder that we recommitted  
21 ourselves to really understanding all the  
22 variations of source and process when we are

1 reviewing a material, and not to limit  
2 ourselves to, perhaps, specifically, what the  
3 petitioner petitions, but to broaden ourselves  
4 and say, are there other ways to make this  
5 material that, perhaps, we would or wouldn't  
6 want on the list, not just this specific one.

7 Any questions about that? Okay.

8 My last topic, I was asked by a  
9 couple different folks on the Board to speak,  
10 specifically, to the role of the NOSB  
11 reviewer. So, this is the person who at our  
12 public meetings will often present materials,  
13 and we have received some public comments that  
14 that person is advocating for a material, and  
15 we just wanted to clarify what their role is.

16 So, it is our practice when we get  
17 a -- when we are doing a Sunset Review, or  
18 reviewing a petition material, that the  
19 committee chair will assign that material to  
20 a committee member to lead the review. That  
21 person is often chosen because of some area of  
22 expertise that they have that they can bring

1 to bear to the material.

2 The role of this what I'm calling  
3 the lead person is to find the relevant  
4 information on the material, develop an  
5 initial perspective for the recommendation,  
6 but then to make sure that all perspectives  
7 are provided to the rest of the committee, and  
8 then lead the committee debate.

9 That person will also write the  
10 committee recommendation, but then get input  
11 from the rest of the committee, and will often  
12 then at this NOSB meeting present the  
13 committee recommendation, and then will often  
14 write the final recommendation.

15 It is really important for the  
16 public to know that this reviewer is  
17 representing their committee. Sometimes they  
18 may or may not be representing their own  
19 personal opinion. It's their job they have.  
20 So, you know, we would politely ask that you  
21 refrain from saying that that person advocated  
22 one way or the other. They are really trying

1 to represent the broad discussion that that  
2 committee had.

3 Any questions on that topic?

4 Okay.

5 A little bit hard to see, but just  
6 a reminder, there's three main websites we  
7 use, the NOP website, the NOSB website, and  
8 regulations.gov, for public comments, and that  
9 is it.

10 Thank you.

11 (Applause.)

12 MS. HEINZE: I'll take questions  
13 if there are any.

14 CHAIRPERSON GIACOMINI: Any  
15 questions for Katrina?

16 Just one sort of further  
17 clarification when you were talking about  
18 handling of Sunset, we are planning to vote on  
19 these recommendations here at this meeting, as  
20 appropriate, pulling out anything that has  
21 significant problems from public comment.

22 We will then evaluate public

1 comment as it continues to come in on the  
2 Sunset Federal Register Notice, vote to  
3 reaffirm or not reaffirm at the fall meeting,  
4 and anything that is not reaffirmed will be in  
5 the mix for review and vote at the spring  
6 meeting.

7 We don't plan to pull out and  
8 immediately bring right back in at the fall  
9 meeting. It will be -- it will receive the  
10 full time frame of the Board's consideration  
11 to finish up anything that we pull out of here  
12 that doesn't receive an affirmative vote.

13 If we pull it out at this meeting,  
14 it can go on the fall agenda, but if we pull  
15 it out sort of at the fall time, then it goes  
16 up for spring, it won't come right -- it won't  
17 be on the agenda for that same meeting.

18 So, just to clarify, yes, Katrina?

19 MS. HEINZE: On a separate topic,  
20 I just wanted to remind the Joint Handling and  
21 Materials Committee that we have a meeting  
22 right after this, so don't forget.

1 CHAIRPERSON GIACOMINI: I can  
2 forget really quickly sometimes. No.

3 Yes, Valerie?

4 MS. FRANCES: Just a housekeeping  
5 thing for the audience. The public comment  
6 book is out on the table where people were  
7 coming in for the pasture training. I'm  
8 assuming it's still there, and everyone is  
9 finding it.

10 And then, there is an additional  
11 book that is the daily registration book, not  
12 really registration, but we need to account  
13 daily for the attendance, and so we have to  
14 keep a record. So, every day that you are  
15 here, if you could just sign that you are  
16 here, that would be super.

17 Thanks.

18 CHAIRPERSON GIACOMINI: Okay. Any  
19 other business or announcements at this time  
20 before we call this meeting for a recess for  
21 the evening?

22 seeing none, I think we are off to

1 a great start this afternoon. This meeting is  
2 now in recess until 8:00 tomorrow morning for  
3 public comment. Everyone have a safe evening.

4 (Whereupon, the meeting was  
5 recessed at 5:28 p.m., to reconvene the next  
6 morning at 8:00 a.m.)

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