

UNITED STATES DEPARTMENT OF AGRICULTURE

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NATIONAL ORGANIC STANDARDS BOARD MEETING

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TUESDAY, OCTOBER 28, 2014

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The National Organic Standards Board met in Grand Ballroom B, Galt House Hotel, 140 N. 4th Street, Louisville, Kentucky, at 8:34 a.m, Jean Richardson, Chairperson, presiding.

PRESENT

JEAN RICHARDSON, Chairperson
JOHN FOSTER, Vice Chairperson
MAC STONE, Secretary
HAROLD AUSTIN
CARMELA BECK
COLEHOUR BONDERA
JOE DICKSON
TRACY FAVRE
JAY FELDMAN
WENDY FULWIDER
NICK MARAVELL
ZEA SONNABEND
JENNIFER TAYLOR
FRANCIS THICKE
C. REUBEN WALKER

STAFF

**MICHELLE ARSENAULT, Advisory Committee
Specialist**

**REX BARNES, Agricultural Marketing Service
Associate Deputy Administrator**

LISA BRINES, NOP National List Manager

**EMILY BROWN ROSEN, AMS NOP Specialist,
Standards Division**

MILES McEVOY, AMS NOP Deputy Administrator

BETSY RAKOLA, USDA Organic Policy Advisor

CARRIE RICCI, Office of General Counsel

SAM JONES, Public Affairs

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Agricultural Marketing Service
Designated Federal Officer
National Organic Standards Board

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

2 8:34 a.m.

3 MR. McEVOY: I am going to
4 introduce Rex Barnes, who is the Associate
5 Deputy Administrator at the Agricultural
6 Marketing Service.

7 MR. BARNES: Welcome, everybody,
8 to the Organic Standards Board meeting.

9 This is my first meeting that I
10 have been to. I have been around AMS for
11 many, many years, way longer than the National
12 Organic Program has been around AMS, but this
13 is the first time I have got an opportunity to
14 come to a meeting. And it is an honor to be
15 here and see everybody here. I have met a lot
16 of people and hope to meet some more during
17 the day today. I will be here for today, and
18 then, I have got to go back this evening.

19 But welcome. I am looking forward
20 to the meeting. I went through the briefing.
21 You have got a lot of very technical issues
22 and stuff to go through. So, let's get it

1 going, and I will turn everything over to
2 Jean. She can get the meeting started, so we
3 can get moving.

4 Thank you very much.

5 CHAIR RICHARDSON: Thank you very
6 much, Rex.

7 It is a pleasure to be here this
8 morning. I would like to turn the meeting
9 over to Deputy Administrator McEvoy for a few
10 minutes, so that he can introduce the members
11 of the NOP staff that are here today.

12 MR. McEVOY: Great. It is great
13 to be here in Louisville. We tried to get
14 here a year ago, but we had a little problem
15 with -- well, a little problem for all the
16 federal government for a while there. So, it
17 is really great to be here in Louisville and
18 with the National Organic Standards Board.

19 And we are here with a number of
20 people from USDA:

21 Myself, Deputy Administrator of
22 the National Organic Program and Designated

1 Federal Officer for the National Organic
2 Standards Board.

3 We have Michelle Arsenault who
4 provides all the support for the National
5 Organic Standards Board. She does a yeoman's
6 job at keeping everything running, keeping the
7 Board informed, handling all the Subcommittee
8 meetings, all the logistics. She really does
9 an amazing job to keep the trains on the track
10 with the National Organic Standards Board.
11 So, she deserves a lot of appreciation for
12 what she does for the organic community and
13 for this Board. So, that's Michelle. Give
14 her your thanks.

15 (Applause.)

16 We also have Emily Brown Rosen,
17 who is the primary technical support for the
18 National Organic Standards Board. She sits on
19 just about all the Subcommittee meetings and
20 provides them with technical support in a
21 whole variety of different ways of providing
22 that information that they need to be able to

1 do their work in the Subcommittees. So, thank
2 you, Emily, for your work.

3 (Applause.)

4 At the back table here, we have
5 Lisa Brines, who is with the NOP Standards
6 Division. She is our National List Manager.
7 So, she does all the work on the amendments to
8 the National List, supports the work on
9 technical reports. That is her primary there
10 in the Standards Division, is to manage that
11 National List, which takes quite a bit of
12 effort for the National Organic Program.

13 She also does a lot of other
14 standards-related activities as well. For
15 instance, she sits on or attends the CODEX
16 meetings on labeling. She just got back from
17 Rome, where she represented the National
18 Organic Program on Organic Labeling Issues at
19 CODEX. So, thank you, Lisa, for that service
20 in Rome.

21 We also have Carrie Ricci from the
22 Office of General Counsel here, who is here

1 for the first time to observe the activities
2 of the National Organic Standards Board to
3 support us.

4 Then, at the front table we have
5 Betsy Rakola, who is the new USDA Organic
6 Policy Advisor. She will be giving a
7 presentation on all the activities at USDA
8 regarding organic agriculture later this
9 morning.

10 And then, we have, next to her,
11 Sam Jones, who is with the AMS Public Affairs
12 Office. So, any questions from the media or
13 others, Sam can help you out there. So, he is
14 the person to go to. He has a lot of great
15 information.

16 And I think that's it. So,
17 thanks, Jean.

18 CHAIR RICHARDSON: So, I will
19 introduce myself last. But the next thing I
20 would like to do is to just quickly go around
21 the Board and have each of them say a couple
22 of words about themselves. So that you all

1 know who is up here on the NOSB. And I would
2 like to start with Colehour.

3 MEMBER BONDERA: Okay, thank you.

4 My name is Colehour Bondera. I am
5 a small-scale farmer, organic farmer, in the
6 State of Hawaii. I wasn't really thinking
7 very hard through what I might say to you all
8 at the get-go here.

9 But good morning. And I think,
10 realistically, my approach to this whole topic
11 is we are all part of the same family and we
12 all need to work together.

13 So, thank you.

14 MEMBER MARAVELL: Nick Maravell,
15 organic farmer from Maryland. Started out in
16 vegetables. Now I'm crop and livestock.

17 CHAIR RICHARDSON: And you should
18 read the overheads as well, because you see he
19 featured on Dr. Oz last year.

20 (Laughter.)

21 MEMBER WALKER: Good morning.

22 My name is Calvin Reuben Walker.

1 I serve as Chair of the Department of
2 Agricultural Sciences and Urban Forestry at
3 Southern University.

4 And for those of you who do not
5 know, Southern University is one of 19 HBCU
6 universities, Historically-Black Land Grant
7 Universities. It was created by the second
8 Morrill Act. Oregon State is what we call it,
9 1862.

10 So, Dr. Tucker and I are part of
11 the 1890 institutions. We were created 32
12 years later to do agricultural teaching,
13 research, and extension. And next year will
14 mark the 125th anniversary of the 1890s, and
15 we appreciate and hope that stakeholders will
16 look at these 1890 and '62's in terms of
17 agricultural research, teaching, and we are
18 trying to move along with organics.

19 And I would like to say an
20 appreciation to Ms. Liana Hoodes. She will be
21 moving on from the National Organic Coalition.

22 I am on the Board to represent the

1 consumer interests.

2 And we would also like to say a
3 prayer for Mr. Dave Will. He mentioned to me
4 that his wife was ill; he would probably not
5 be able to make this meeting. So, we have Mr.
6 Dave Will's wife in our prayers.

7 And also, I would just like to say
8 that we appreciate Secretary Vilsack. I know
9 that I do because he believes in diversity.
10 And personally, from what I see, I think he is
11 doing a yeoman's job. I just hope that we
12 will do all we can to support the Secretary as
13 well as the NOP.

14 And also, I just happen to serve
15 as the Materials Subcommittee Chair.

16 C'est tout.

17 MEMBER SONNABEND: Hi. I'm Zea
18 Sonnabend, a small farmer from Fruitilicious
19 Farm in Watsonville, California. I hold the
20 scientist's seat on the Board, largely because
21 a majority of my career spent in writing
22 organic standards with CCOF nationally and

1 working with OMRI on materials review.

2 MEMBER FULWIDER: I'm Wendy
3 Fulwider, and I serve as a producer on the
4 Board. And I own an organic family farm in
5 Wisconsin. My son Cody is currently the
6 fourth generation operating on that farm. He
7 has a 60-cow organic dairy where the milk goes
8 to Organic Valley. We have 200 acres that are
9 organic, and we just added another 100 acres
10 to put in transition. We have been very
11 fortunate; people want their land to be
12 managed organically. So, they do come to us
13 and ask us to run their land. The transition
14 acres we usually do in direct marketing, and
15 that supports our grass-finished beef and
16 pastured pork.

17 And as you know, I have a PhD in
18 animal behavior that I earned with Temple
19 Grandin. And so, that has allowed me to work
20 as a Farm Animal Care Specialist at Global
21 Animal Partnership and previously with Organic
22 Valley.

1 MEMBER AUSTIN: Good morning.

2 My name is Harold Austin. I am
3 with Zirkle Fruit Company out of the State of
4 Washington. We are a producer/handler of
5 organic apples, cherries, blueberries, and
6 wine grapes.

7 I was born and raised on an apple
8 farm in the Pacific Northwest. I spent a lot
9 of time on my grandfather's dairy farm.

10 For Zirkle, I manage all of our
11 organic compliance from the production side of
12 it and the handling side of it as well. I
13 have been a Certified Test Consultant for in
14 excess of 35 years. At this juncture, I am
15 very involved in integrated pest management
16 and, also, organic production as well, for a
17 number of years with a lot of different
18 growers that I helped move into that arena.

19 I serve on the Crops Subcommittee,
20 the CACS Committee, and then, I chair the
21 Handling Subcommittee.

22 For me, it is honor to sit on this

1 Board with my colleagues. We come from a very
2 broad spectrum of what we believe in,
3 representing a lot of different organic
4 stakeholders out of the organic community. We
5 may not always agree on the issues, but we
6 have some very robust conversations along the
7 way. And at the end of the day, there is not
8 a one of us that sits up here at this table
9 that doesn't have the best of the organic
10 industry and the organic community in their
11 hearts and in their desires.

12 And I applaud the energy, the
13 passion, and the camaraderie, but most of all
14 the dedication. There is a lot of time and
15 energy that goes into serving on this Board.
16 We are a volunteer Board appointed by
17 Secretary Vilsack.

18 And I am not sure if some of you
19 understand the time commitment that does come
20 with sitting on this Board. It is a lot, but
21 I am glad I am here. And hopefully, at the
22 end of the day we have done a lot of good for

1 the organic community.

2 Thank you.

3 MEMBER FELDMAN: Good morning.

4 I am Jay Feldman. I sit on one of
5 the environmentalist slots on the Board. I
6 got involved with pesticides back in the
7 seventies, collaborating with EPA. Traveled
8 across the country and met with farm workers
9 and small farmers talking about their adverse
10 reactions to pesticides, which led to the
11 creation of the worker protection standard at
12 EPA.

13 But it became obvious at that time
14 that, unless we were advancing alternatives,
15 that we would be on this treadmill. And so,
16 I got very heavily involved in the writing of
17 the Organic Farming Act and, then, the
18 Agricultural Productivity Act, which started
19 the LISA Program, the Low Input Sustainable
20 Act Program, at USDA, which, then, became
21 SARE, as you all know.

22 And then, of course, with many of

1 the folks in this room, we all wrote the
2 Organic Foods Production Act, which to this
3 day retains the highest, I believe, core
4 environmental public health/food safety values
5 of any statute perhaps in the world.

6 So, this is a very meaningful, as
7 Harold has said, this is a meaningful endeavor
8 for all of us in this room. And I have been
9 honored to serve on the Board with all my
10 colleagues up here for the past five years,
11 and we will talk more about that later in the
12 meeting.

13 Thank you.

14 MEMBER STONE: Good morning.

15 My name is Mac Stone. I am the
16 certifier rep to the Board. A shoutout to
17 certifiers. Those of you that have not gone
18 through the certification process or continue
19 to be part of the certification process, the
20 due diligence that certifiers do on behalf of
21 the seal that we all represent here is just a
22 tremendous amount of work.

1 And frankly, as an organic farmer,
2 and with my wife and her family farm about
3 hour east of here, we have about 150 acres
4 certified organic. Do vegetables, beef,
5 poultry for the direct market in the Lexington
6 area, and we are now moving into the
7 Louisville area.

8 So, I want to welcome you all to
9 Louisville. As your host, the Chamber of
10 Commerce always has really nice weather when
11 you get here, and then, it gets really crappy,
12 so you will leave at the end of the meeting.

13 (Laughter.)

14 But welcome. If there is anything
15 I can do or help assist you in moving around
16 Louisville the next few days, let me know.

17 Thanks.

18 VICE CHAIR FOSTER: Good morning.

19 My name is John Foster. I'm one
20 of the two handling representatives on the
21 Board. This is my last public meeting of an
22 almost five-year term now.

1 I currently serve as the Vice
2 Chair. I have served as the Chair of both the
3 Crops and the Handling Committees over the
4 years.

5 My day job is Director of
6 Compliance at Earthbound Farm. I have been
7 there a little over seven years. The group
8 that I am responsible for maintains the
9 integrity around organic issues, food safety
10 issues, and quality issues of our supply
11 chain. And we actively monitor roughly 450
12 suppliers that feed into our organization.

13 In the past I have been an
14 environment studies and literature major,
15 horticulture crop production.

16 I have done a little painting over
17 the years. Thank you, Jean, for including
18 that.

19 (Laughter.)

20 And one of my favorite professions
21 I have had over the years is being an organic
22 inspector, somewhere, give or take, around

1 1,000 inspections over 12 years. And that was
2 really where I got to know a lot of you,
3 actually, in the gallery.

4 And it remains one of my favorite.
5 One of the most meaningful things I have ever
6 done is being the boots on the ground and
7 seeing the hard work that goes in to grow all
8 the crops, to get them to market, to sell the
9 crops. It takes a whole chain to do it, an
10 unbelievable amount of work and an
11 unbelievable amount of cooperation. So, I
12 have been very honored to be part of this
13 evolving system that we have.

14 Thank you.

15 MEMBER DICKSON: Good morning.

16 My name is Joe Dickson. I am the
17 lonely one retail representative on the
18 National Organic Standards Board. A shoutout
19 to all the retailers out there.

20 I have worked continuously as a
21 grocery retailer since my parents made me go
22 out and get a summer job when I was 14 years

1 old. I bagged groceries that summer, and I
2 have since that year worked in some form at a
3 grocery store.

4 I have developed a very deep
5 interest in the power that food labels have in
6 the marketplace, how food is sold and marketed
7 to consumers, and how standards like the one
8 that we are working on here can allow people
9 to express their beliefs and their ethics
10 through the food they buy.

11 I work currently as the Senior
12 Global Quality Standards Coordinator at Whole
13 Foods Market. I lead a small team there that
14 is responsible for developing standards and
15 policies that determine what products we sell
16 in our stores.

17 I also oversee our status as a
18 Certified Organic Retailer, which includes the
19 inspection and certification of over 390 of
20 our stores in North America.

21 I serve on the Texas Department of
22 Agriculture's Organic Industry Advisory

1 Committee. And as of this year, I own a small
2 family farm in Bastrop County, Texas.

3 I serve on the Handling,
4 Livestock, and CACC Subcommittees.

5 And it is a pretty much
6 indescribable honor to sit at this table with
7 this group of thoughtful and amazing people
8 and to be in this room with this organic
9 community. And I am very grateful to be here.

10 MEMBER FAVRE: Good morning.

11 My name is Tracy Favre. I sit in
12 one of the environmentalist positions on the
13 Board.

14 I am from the great State of Texas
15 and have a small family diversified farm in
16 north central Texas, just southwest of Fort
17 Worth, and including livestock and crops.

18 I previously cut my teeth in
19 sustainable agriculture, working for holistic
20 Management International out of Albuquerque,
21 training farmers and ranchers on sustainable
22 farm and ranch management.

1 I have recently completed IOIA
2 training to become an Organic Livestock
3 Inspector.

4 And I am happy to be here. Thank
5 you.

6 MEMBER BONDERA: Good morning,
7 everyone.

8 I am kind of in the back. I am
9 from Watsonville, California. I work for
10 Driscoll Strawberry Associates. We are an
11 international distributor of conventional and
12 organic strawberries, raspberries,
13 blackberries, and blueberries. I have been
14 with the company a little over seven-and-a-
15 half years and manage the Organic Compliance
16 Program. So, I work with upwards of 80
17 organic growers in the U.S., Mexico, and
18 Chile. It is from our nursery certification
19 to our grower certification and to our
20 handlers.

21 I think it is really important to
22 note that we work with independent family

1 farmers, and I feel blessed to say that I know
2 all of our farmers and have personal
3 relationships with them. And that makes me
4 happy. That makes me happy to do this work.

5 And similar to my other colleagues
6 here, I find it, I call it a blessing to be a
7 part of this. It is challenging, but it is
8 also very rewarding. And I am grateful to the
9 community of people who have come year after
10 year to these meetings to improve the organic
11 standard.

12 Okay, thank you.

13 MEMBER THICKE: I am Francis
14 Thicke. I am an organic, grass-based dairy
15 farmer in southeast Iowa. I am in an
16 environmentalist position here, actually.

17 I began farming organically in
18 1975, actually, and then, took a little detour
19 and became a dirt scientist and worked for U
20 USDA for a while. And now, I am a born-again
21 farmer.

22 CHAIR RICHARDSON: And you should

1 notice he is a trumpet player and he might do
2 that sometime when we are having a meeting.
3 So, don't be surprised.

4 (Laughter.)

5 MEMBER TAYLOR: Good morning.

6 I am Jennifer Taylor. I am from
7 Florida A&M University in Tallahassee.

8 I want you to know that this is a
9 great honor to serve as a member of the
10 National Organic Standards Board. And on the
11 Board, my role is to serve as an advocate for
12 the consumer and for public interest.

13 We appreciate your written
14 comments and your public comments. We need
15 your strong comments and interactions to help
16 keep organic standards strong, to ensure the
17 integrity of organic farms, organic produce,
18 organic products, and the actual organic food
19 on your table.

20 Thank you so much for this
21 opportunity.

22 CHAIR RICHARDSON: Thank you.

1 And then, back to me as Chair. I
2 am Jean Richardson. I am a Professor Emerita
3 of environmental studies and environmental law
4 from the University of Vermont.

5 I live in Vermont. I help my kids
6 on their organic maple syrup production
7 enterprise. Being from Vermont, that is
8 pretty much what you have to do. Every tree
9 in Vermont is tapped. It is a sugar maple.
10 You should know that.

11 Let's see, I have done inspections
12 for the last 14 days, probably done about
13 1,000 inspections also, like John, in every
14 aspect of inspection from processing to cows
15 to zucchini.

16 And let's see. Oh, yes, one of
17 the things that I am going to be trying to do
18 is to encourage all the Board members, well
19 those that are not leaving, to be sure that
20 they have, in fact, shadowed, been on a few
21 inspections. And I am going to be asking the
22 new people coming in if they would also go

1 shadow some inspections, so they could
2 understand boots on the ground what it is like
3 when we make some of the decisions that we do
4 on the NOSB.

5 Okay. So, that is all the Board.
6 So now, the next item on the agenda is to take
7 the Secretary's report. I will turn that over
8 to Mac, please.

9 MEMBER STONE: And we are to
10 approve the minutes from the meeting that was
11 in San Antonio in the spring. Those were sent
12 to everyone on the Board. Are there any
13 changes or anything we need to address, as
14 they were submitted?

15 (No response.)

16 Seeing none, Madam Chair, I ask
17 for a vote to approve.

18 CHAIR RICHARDSON: Any objections?

19 (No response.)

20 So approved.

21 The next item on the agenda will
22 be a presentation by Deputy Administrator

1 McEvoy abut the updates to the National
2 Organic Program.

3 MR. McEVOY: Okay. Good morning.

4 So, this is what we do at every
5 NOSB meeting, give a report of all things
6 happening at the National Organic Program, and
7 there are many things that we are up to. So,
8 I am going to give you a little tour of some
9 of the activities that we are up at the
10 National Organic Program.

11 Next slide. Oh, I have control
12 here. Let's see. Okay.

13 So, the mission of the National
14 Organic Program is to ensure the integrity of
15 USDA organic products in the United States and
16 throughout the world. It is a global program.
17 So, we are certifying operations under the
18 USDA organic standards in more than 100
19 countries, 133 countries I think. So, there
20 are a lot of activities that we do throughout
21 the world to ensure that integrity of the
22 system from the farm to the market.

1 Our vision is organic integrity
2 from farm to table. Consumers trust the
3 organic label. So, those standards are
4 important to verify at all levels of the
5 production and distribution. And our core
6 role is to implement the Organic Foods
7 Production Act and the USDA organic
8 regulations.

9 So, the USDA organic regulations
10 are very comprehensive. They include
11 standards for crops, livestock handling, wild
12 crops, labeling requirements, certification
13 requirements, accreditation, and the National
14 List. So, it is a very comprehensive list of
15 regulations, and this National Organic
16 Standards Board looks at those things and
17 provides us with recommendations around those
18 standards. A lot of focus on the National
19 List, but there is a lot more to organic
20 production and handling than just the National
21 List, and those are very important components
22 of this whole system that we also need to pay

1 close attention to.

2 Accreditation and oversight is the
3 other very important component of our work.
4 There are over 80 authorized certifying agents
5 worldwide, from the very small in particular
6 counties in California to certifiers that are
7 certifying in more than 50 countries and
8 thousands of operations. It is over 25,000
9 certified organization operations in the
10 world, over 18,000 in the U.S. and the rest
11 overseas.

12 Compliance and enforcement is a
13 very critical part of our work. So, we handle
14 complaints, do investigations, impose civil
15 penalties, and deal with the appeals process.

16 And then, of course, our support
17 for the National Organic Standards Board,
18 supporting their work, looking at their
19 recommendations, and implementing them as
20 appropriate.

21 So, some quick facts about the
22 National Organic Program. We are up to 43

1 employees now. If you have been following
2 along for the last -- when I got here five
3 years ago, I started with 14 employees. So,
4 there has been significant growth in the
5 staffing at the National Organic Program.
6 There are three Divisions and the Office of
7 the Deputy Administrator.

8 Some of the new staff that we
9 brought on this year with our increased
10 funding was a Chief of Staff, who handles a
11 lot of the administrative aspects of the
12 National Organic Program, and the people that
13 provide administrative support.

14 We have a new Cost-Share Manager
15 with the reauthorization of the Cost-Share
16 Program. We have three new Compliance
17 Officers that help out with compliance and
18 enforcement.

19 We have three new Accreditation
20 Managers that are doing audits and dealing
21 with all the oversight of accredited
22 certifiers.

1 We have a new Assistant Director
2 of the Accreditation and International
3 Activities Division, and we have some new
4 administrative staff.

5 We are adding additional staff as
6 well. So, by the time we report in the
7 spring, we should be up to about 50 staff
8 within the National Organic Program.

9 (Applause.)

10 Okay, great.

11 Hiring at the federal government
12 is a very slow process, but we have really
13 brought on some really excellent staff to help
14 out with the mission of the program.

15 Our budget has changed in the last
16 few years. We were about \$7 million in fiscal
17 year 2012, went down a little bit with the
18 sequestration for '13, and then, up to \$9
19 million for last year's fiscal year budget.
20 We are currently working under a Continuing
21 Resolution through December 11th, but that is
22 at basically the same level as the fiscal year

1 2014 numbers.

2 Our Strategic Plan focuses on four
3 primary areas: clear standards, consumer
4 protection, market access, and information
5 technology.

6 So, the next number of slides I am
7 going to focus on those two parts, on clear
8 standards and consumer protection, which are
9 some of the core parts of our Strategic Plan.

10 So, we have what we call the 10
11 points of organic integrity. They include
12 clear enforceable standards; communication
13 about those standards, so people know what
14 those standards are and where there are
15 changes to the standards; transparency in
16 terms of the process, trying to provide as
17 much information about the standards and the
18 process to change the standards; certification
19 as a core part of organic integrity, kind of
20 the heart and soul of the whole system; a
21 complaint system that is effective; a penalty
22 system that has real penalties for serious

1 violations to the standards; market
2 surveillance, so we can see how the labels are
3 being used in the marketplace; unannounced
4 inspections, so that there are times when a
5 certified operation does not know that they
6 are going to get inspected. So, that is part
7 of the process. Periodic residue testing as
8 a part of the overall system, and then, a core
9 organic value of continual improvement. We
10 are always looking at, okay, how is the system
11 working; how could we make improvements. So,
12 for each of these points, I am going to go
13 into a little more detail and talk about some
14 of our current activities.

15 For clear and enforceable
16 standards, we want to publish clear standards,
17 so people understand what the rules are. If
18 they understand what the requirements are, it
19 is much easier for producers and handlers to
20 comply. We want to address those gray areas,
21 and we have quite a number of gray areas under
22 the organic regulations, so we have to provide

1 clarity and consistency there, and continue to
2 collaborate with the National Organic
3 Standards Board on addressing those gray areas
4 and providing clear standards to the organic
5 community, and also, implementing the NOSB
6 recommendations, which is very important.

7 Some of the things that we have
8 done over the last year on clear and
9 enforceable standards:

10 We have worked very closely with
11 FDA on their proposed produce food safety
12 rules and how they interplay with organic
13 standards. And so, FDA came out with their
14 new proposed produce food safety rules fairly
15 recently. And I think a lot of people can see
16 that they are much more reasonable for the
17 organic producers. And there's a lot of
18 people in this room that did a lot of work to
19 work with FDA, but you can know that at USDA
20 we also work with FDA to get them the input
21 they needed to come out with a new proposed
22 food safety rule.

1 We also put out an instruction on
2 the use of brand or company names containing
3 the word "organic". This is the policy that
4 the Compliance and Enforcement Division has
5 been using for a number of years in terms of
6 the use of the word "organic" in brand or
7 company names.

8 So, this provides clarification to
9 the industry of what is expected in terms of
10 the use of organic on labels; provides
11 instructions to certifiers on how they need to
12 evaluate labels that they are approving, so
13 that there is a consistency in terms of the
14 use of the word "organic" on organic, 100
15 percent organic, and made with organic,
16 certified organic products.

17 We also put out final guidance on
18 made with organic labeling. So, that provides
19 more specificity, more information about the
20 appropriate labeling for the product category
21 of made with organic ingredients or specified
22 food groups.

1 So, some of our priorities for
2 2015. We have some things in clearance. The
3 process of getting a rule to publication is a
4 very long and twisted route. I like to break
5 it up into four basic steps.

6 The first step is for the program
7 or the agency to draft the rules. The second
8 step is for those rules to be reviewed by the
9 Office of General Counsel and get cleared by
10 the Office of General Counsels. The third
11 step is departmental clearance where it goes
12 through the halls of USDA and gets approved by
13 a variety of different offices at USDA. And
14 then, the fourth step, if it is a significant
15 rule, is to get reviewed and cleared by the
16 OMB, the Office of Management and Budget. So,
17 it is a long process. Each of those steps can
18 take many, many months.

19 So, I am happy to report on origin
20 of livestock. For that proposed rule, it is
21 in departmental clearance, and we are hoping
22 to get that off to the Office of Management

1 and Budget later this year. So, Office of
2 Management and Budget is about a 90-day review
3 cycle, sometimes longer. So, we are really
4 hoping that the origin of livestock proposed
5 rule will be published sometime in the early
6 spring of next year.

7 The aquaculture proposed rule is a
8 little bit further behind. It is still in
9 that second step of OGC review or Office of
10 General Counsel review. So, it has to
11 complete that review, and then, it will start
12 departmental clearance.

13 The pet food proposed rule is also
14 under review by the Office of General Counsel.

15 So, those still have quite a ways
16 to go, but we are hoping to get those, both of
17 those proposed rules published in 2015.

18 Other rules that are in progress,
19 meaning that they are not quite as far along
20 in the process, are a proposed rule on sodium
21 nitrate, which is taking a recommendation from
22 the National Organic Standards Board from

1 2011, '10 possibly. So, that one has been a
2 little bit difficult for us, but we are hoping
3 to get a proposed rule out on that this coming
4 year.

5 Animal welfare, where we put a
6 whole team together that is working on animal
7 welfare. We are making a lot of progress on
8 that.

9 Any proposed rule has a number of
10 different sections. There is the background
11 section, the regulator impact section, and the
12 regulatory text section. So, there's actually
13 more sections than that, but that is just an
14 oversimplification of some of those sections.

15 And so, we have made a lot of
16 progress on the regulatory section and the
17 background section. We are still working on
18 the regulatory impact section, but we hope to
19 have that all completed and off to the Office
20 of General Counsel by the end of the year.

21 So, we are putting a lot of focus on animal
22 welfare to, hopefully, move that out and get

1 that published next year.

2 Aquaculture is also in progress.
3 That rule has been written and potentially
4 could get published next year.

5 Other standards projects that we
6 are working on:

7 We will have Final Guidance on
8 classification of materials. The Draft
9 Guidance on that came out a while ago, as well
10 as the materials for organic crop production.
11 So, both of those should go into final
12 guidance sometime potentially by the end of
13 the year or early next year.

14 And then, post-harvest handling,
15 the Final Guidance on that should be out
16 within the next six months.

17 We are working on a number of
18 Draft Guidances and policy. We are working on
19 a Draft Guidance for responding to pesticide
20 drift. With the residue testing requirements
21 now that certifiers have to do, there are some
22 questions on what happens when drift occurs on

1 a certified organic farm. So, we want to
2 provide more guidance and consistency in terms
3 of how that works.

4 Nanotechnology was a
5 recommendation from the National Organic
6 Standards Board from a few years back. We
7 have a policy memo clarification that is
8 currently in clearance. That should be
9 published sometime within the next six months,
10 I should say.

11 I hear Melissa's voice in my head
12 of, "Don't say things are going to be
13 published right away, even though they might
14 be."

15 So, nanotechnology, in terms of
16 that, nanotechnology materials are considered
17 synthetic materials. So, they are not allowed
18 under the USDA organic regulations. We are in
19 the process of clarifying that in a policy
20 memo that should be out within the next six
21 months.

22 We continue to work on material

1 clarifications, when we have one certifier and
2 another certifier or material review
3 organization that have different
4 interpretations of the rules in terms of what
5 is allowed under the organic standards. So,
6 we have that process that we continue to
7 provide more clarification to certifiers and
8 the organic industry about the allowances.

9 We have put out, for instance,
10 clarifications on electrolyzed water and,
11 let's see, a couple of other things. Emily
12 would remember.

13 We are also looking at publishing
14 Draft Guidance on materials for organic
15 livestock production sometime in the
16 relatively-near future.

17 So, lots of different standards-
18 related projects that we are working on.

19 In terms of communication, there's
20 a lot of things that we do to communicate
21 about the activities at the National Organic
22 Program and really organic things in general

1 at USDA.

2 We have the Organic Literacy
3 Initiative that Betsy Rakola will talk more
4 about, which a lot of USDA staff have taken
5 that literacy initiative.

6 We have the Organic Integrity
7 Newsletter. We have the NOP Organic Insider
8 to try to keep people informed of the
9 activities at USDA around organics. And we
10 also can at times provide information about
11 other activities in organics through the NOP
12 Organic Insider.

13 We have a number of fact sheets on
14 GMOs, which is a very popular labeling at
15 farmers' markets and sunset. So, there's a
16 lot of fact sheets that we provide, and we
17 will continue to expand on those fact sheets.

18 We have done a number of NOP
19 website improvements. There is actually a
20 major effort to change the website. So,
21 within the next few months, you will see that
22 the NOP website will be quite a bit different.

1 It might take a little while to get used to,
2 but, hopefully, it will be a lot more
3 accessible to find information through the
4 changes to the website.

5 We do a number of presentations
6 and conferences.

7 And on to transparency. So, we
8 have a list of certified operations. It now
9 includes an updated list of suspended and
10 revoked operations that is incorporated into
11 the list. That is a new feature for this
12 year. So, that is something.

13 We have been posting fraudulent
14 certificates for a period of time, especially
15 for foreign operations where we don't have the
16 same kind of enforcement authority as we have
17 in the U.S.

18 We publish certifiers' audits and
19 Corrective Action Reports. We publish all the
20 NOSB Subcommittee notes. And for this fiscal
21 year, we plan to post adverse actions. Those
22 are all our cease and desist notices, our

1 settlements, and all those different types of
2 compliance actions. So, that is on our plan
3 to provide more information about the
4 activities at the National Organic Program.

5 In terms of certification, again,
6 that is the core business of -- the core
7 verification system is done through
8 certification under the organic regulations.
9 So, we have to make sure that certification is
10 done in a quality manner, that there is a
11 quality system, quality inspectors, quality
12 reviewers; that the process works from start
13 to finish.

14 So, that includes organic system
15 plans, that they are thorough and complete;
16 that inspections include audits in terms of
17 reconciliation audits of sales and yields;
18 that they include feed audits at an organic
19 livestock operation; that the inspections
20 include inspections of non-organic areas of an
21 operation. If it is a split operation, that
22 is a component of certification.

1 That there is timely followup by
2 the certifier, if they have findings during
3 the inspection, and that there is some time of
4 continual monitoring of the certified
5 operations. So, lots of things that
6 certifiers are required to do. We have to
7 make sure that that is actually occurring on
8 all the certifiers that are operating around
9 the world.

10 The Accreditation and
11 International Activities Division, they
12 oversee the work of more than 80 certifying
13 agents around the world. They are conducting
14 audits. Each certifier is audited at least
15 twice in a five-year period of time. Those
16 audits are about a week long. It kind of
17 depends upon the scope of that certifier of
18 how long the audit is. A certifier that is
19 operating in multiple countries has a much
20 longer audit than ones that are operating in
21 a smaller geographical area.

22 So, there are audit reports.

1 There is the review of those reports. There
2 is Notices of Non-Compliance that go out after
3 those reports are received in the office in
4 D.C. And then, we have to review the
5 corrective actions that the certifiers are
6 taking to correct the findings from those
7 audits.

8 Through all those audits that we
9 do, there's thousands of criteria that are
10 evaluated on a yearly basis. Certifiers are
11 complying with more than 95 percent of all the
12 accreditation criteria. So, they are doing an
13 excellent job. There is always room for
14 improvement, but it is really important that
15 we do those audits to make sure that they are
16 continuing to meet the requirements.

17 Moving on to complaints, the
18 complaint pie has changed over the last few
19 years. If you recall, it used to be about a
20 split of 50/50 between complaints for
21 certified versus uncertified operations. Now
22 we have two-thirds of the complaints that we

1 receive are for uncertified operations. It
2 looks like 20 percent are for allegations of
3 labeling violations or fraud. And then, 14
4 percent for complaints about the use of
5 prohibited substances or methods.

6 In last fiscal year, which ended
7 on September 30th, we closed 285 complaint
8 investigations. So, it is very important for
9 us to do these investigations and both find
10 violations or confirm violations and take
11 enforcement actions. It is also very
12 important that for a number of complaints
13 there is no violation. So, it sort of clears
14 the air, that there can be an allegation, but
15 we have to determine whether or not there is
16 actually any violation.

17 We did receive a record number of
18 complaints last year, over 400 complaints,
19 which is a new record. That is almost three
20 times the amount of complaints that we got
21 when I first started five years ago. So, the
22 number of complaints is increasing. I think

1 that is a good thing. That means that people
2 are out there. They know that there is this
3 method to file a complaint for potential
4 violations of the standards, but it is a lot
5 more work for us to do.

6 We initiated 162 initial
7 enforcement actions, 66 Notices of Warning, 29
8 Notices to Cease and Desist, and 54
9 investigation referrals. So, there is a lot
10 of work involved in compliance and
11 enforcement.

12 On to penalties, in last fiscal
13 year we levied nine civil penalties for
14 \$81,000. We also had a significant ruling by
15 an administrative law judge. So, this does
16 not occur very often. But in the process
17 there is a long compliance and appeals process
18 that is possible to occur.

19 So, the first step is a certifier
20 to take action. The certifier is proposing
21 suspension or revocation. That can be
22 appealed. Then, there is an appeal decision

1 made by the Administrator's Office. That
2 Administrator's decision on that appeal can be
3 appealed. And that appeal, then, requires us
4 to file a complaint. And that complaint,
5 then, goes to an administrative law judge at
6 USDA, that then handles that hearing.

7 We have only had two
8 administrative hearings in the history of the
9 National Organic Program. The first one was
10 Promiseland back in -- well, that took a few
11 years. And this is our second one. This
12 upheld the AMS decision to revoke the organic
13 certification of a Pennsylvania operation.

14 Now this is just still part of the
15 process. This operation has the opportunity
16 to appeal to the judicial officer and, after
17 that, potentially go to District Court. So,
18 these types of compliance actions do take a
19 significant amount of our resources and time
20 to go through that process, to provide people
21 with the due process for our compliance
22 actions.

1 Market surveillance is something
2 that we would like to do more of, that we have
3 not done a lot of, but we think is very, very
4 important. In 2011, we did residue testing of
5 six organic commodities. The results of that
6 are on our website, of what we found.

7 We found that, for the most part,
8 these six organic commodities, I think about
9 half of them had residues, but those residues
10 were less than 5 percent of the EPA tolerance
11 level and not violative residues. There were
12 some problems that were identified.

13 We are doing some followup work on
14 that to, again, look at residues on organic
15 products, just to make sure that all organic
16 products meet organic systems. I think market
17 surveillance is really important for us to
18 expand our activities in this particular area.

19 Unannounced inspection, this is an
20 NOSB recommendation from 2011 for unannounced
21 inspections. We implemented that in, I think,
22 2013, where under Instruction 2609,

1 unannounced inspections are now required by
2 certifiers, that at least 5 percent of the
3 certified operation have unannounced
4 inspection. So, this is where we are
5 implementing the NOSB recommendation. It has
6 been a requirement by certifiers since 2013.

7 Periodic residue testing, the
8 final rule was implemented in 2013. Again, it
9 is now a requirement for certifiers to do 5
10 percent of the operations that are tested each
11 year. It has led to enforcement actions for
12 violations of the organic standard. So, when
13 they are doing this sampling, for the most
14 part, things are in good standing, but,
15 occasionally, they do find residues that
16 require the certifier, then, to take
17 appropriate enforcement action.

18 And we have provided instructions
19 and training on responding to positive
20 residues on selecting labs and provided
21 targeted prohibited pesticides list for the
22 certifiers to utilize.

1 In terms of continual improvement,
2 accreditation audits are part of that. As
3 part of the audits that we do as certifiers,
4 we evaluate all the auditors on a yearly basis
5 that are conducting the audits of the
6 certifiers. We also now have a system where
7 the certifiers can provide feedback to the
8 audits that are conducted. And then, every
9 year we review all the accreditation audits
10 that we conduct to look at what are the
11 trends; what are the parts of the organic
12 regulations that we are finding the most
13 problems with that we can provide more
14 training or assistance to certifiers.

15 We also conduct an internal audit
16 at the National Organic Program that is part
17 of our quality system. We do a management
18 review at the National Organic Program as part
19 of our quality system.

20 And then, we do peer review. Peer
21 review is required under the Organic Foods
22 Production Act, under 2117. The NOSB has made

1 particular recommendations about peer review.

2 We have the National Institute of
3 Standards and Technology that conducted peer
4 review in 2011. We have the American National
5 Standards Institute that completed peer review
6 in 2014. We just published the results of
7 that peer review within the last few weeks.

8 And we are in the process of
9 drafting a peer review process that addresses
10 the NOSB recommendations and we are planning
11 on collaborating with the NOSB. So, this is
12 a topic that we hope to put on the NOSB agenda
13 for discussion for the spring meeting, is peer
14 review and how we are going to fully
15 implemented the peer review requirements.

16 Okay. So, that was a lot of
17 stuff, but now we are moving on.

18 The next parts are not quite as
19 long as that part on clear standards and
20 consumer protection. But, in terms of
21 strategic plan, we also are very interested in
22 market access. When we talk about market

1 access, it is not just international market
2 access; it is also market access for producers
3 and handlers to get into their local and
4 regional markets as well.

5 Certification, we don't want
6 certification to be a barrier to success. We
7 want it to verify that the standards are being
8 met, but we want to make sure that
9 certification is not barrier to people getting
10 into organic production and handling.

11 In terms of international, we have
12 trade arrangements with several nationals to
13 facilitate the exchange of organic products
14 and provide market opportunities for organic
15 producers. We have a number of equivalency
16 arrangements. The first one was set up with
17 Canada in 2009 and is working quite well. The
18 second one was with the European Union, which
19 was launched in June of 2012.

20 And then, we had two equivalency
21 arrangements that became effective this year.
22 The first one was with Japan, effective in

1 January, and then, with South Korea, effective
2 in July. So, a lot of work goes into these
3 equivalency agreements.

4 We also have recognition
5 agreements where we recognize the governments
6 in India, Israel, and New Zealand to accredit
7 the certifiers operating in those countries.
8 So, for instance, in New Zealand it is the New
9 Zealand Government that accredits the
10 certifiers operating in New Zealand. Those
11 certifiers operating in New Zealand are
12 certifying to the U.S. standards.

13 So, it is different than an
14 equivalency agreement where we are accepting
15 the foreign country's standard. In a
16 recognition agreement, the certifier is
17 certifying to the U.S. standard.

18 So, we work very closely with the
19 Foreign Ag Service and the U.S. Trade
20 Representative's Office on all of these
21 various agreements and arrangements. These
22 agreements are continually monitored. So, it

1 is similar to our oversight of accredited
2 certifiers, where we are doing assessments of
3 these foreign government systems every two to
4 three years. So, the same kind of review
5 cycle where we are looking at their
6 accreditation system and their ability to
7 comply with the terms of those agreements.

8 In terms of market access for
9 people getting into local and regional
10 marketing, we have an initiative on sound and
11 sensible, where we want to ensure organic
12 integrity, but that it is done in a sound and
13 sensible manner, what we call certification
14 that is affordable, accessible, and attainable
15 for all operations, affordable meaning
16 reasonable fees and reasonable compliance
17 costs; accessible meaning that there are
18 certifiers and technical assistance that is
19 available throughout the U.S. And that is
20 really, I think, a key in certain areas.
21 There is great resources available. And then,
22 other parts of the country there is not as

1 many resources available for not just
2 certification but those technical resources to
3 be success in organic production and handling.
4 And then, also, attainable, so that the
5 standards are understandable, that they are
6 written in plain English, and with reasonable
7 recordkeeping requirements.

8 So, we have a number of projects
9 that we have started to fund at the end of
10 last fiscal year. Our purpose for the sound
11 and sensible certification projects was to
12 encourage the initiation and rollout of new
13 organic certification approaches, training,
14 and technical assistance to help with that
15 certification process. So, these projects
16 will help USDA and all certifiers develop and
17 implement sound and sensible processes and
18 provide training modules.

19 So, these projects are now in the
20 process of being implemented. Once they are
21 completed, the results of those projects will
22 be available to everybody.

1 So, we made 14 awards to 13
2 organizations, a million and a half dollars
3 through these various sound and sensible
4 projects. They are available throughout the
5 U.S. There is a lot of diversity in terms of
6 the types of projects that have been funded:
7 certification tools; training and outreach
8 tools; technology development; technical
9 assistance, and inspector mentoring.

10 The projects will be completed
11 over the next year, by September of next year.
12 So, we should be able to provide more
13 specificity about the results of these
14 projects at the fall 2015 meeting.

15 Here is just a brief list of the
16 projects that were awarded to a variety of
17 certifiers and other organizations to do a
18 variety of these different projects. So, this
19 presentation will be available on our website
20 later, so you can look at this and the
21 specific projects.

22 Okay. Moving on to information

1 technology, one of our popular tools that
2 people use is our list of certified organic
3 operations. This list is updated only once a
4 year by data that is provided by certifying
5 agents. It is out of date as soon as we
6 publish it. It is a flat spreadsheet format
7 with really poorly-structured, validated data
8 elements.

9 This is a big improvement from
10 five years ago when there was really no list,
11 but it still needs a lot of work. So, there
12 are a lot of constraints to our current
13 system. It is variable data on Excel sheets
14 from 80-plus certifiers. So, the information
15 we get from the various certifiers does not
16 come in in the same format. There's lots of
17 challenges with our current system.

18 So, we are in the process of
19 developing this organic integrity database.
20 This is part of the 2014 farm bill, provided
21 \$5 million in funding for technology
22 investments.

1 And what we have done so far --
2 and this project is really just getting
3 started, we have hired a full-time IT Project
4 manager to start the process. She started in
5 August. We have convened a certifier user
6 group to be engaged throughout the development
7 period because certifiers are going to be key
8 to the success of this. There have to be
9 portals that work, so that certifiers can
10 provide that information on the data that they
11 have on the certified operations to this
12 master database. And then, we are in the
13 process of developing a list of key
14 requirements, project timeline, and
15 contracting strategy.

16 What we are planning to have in
17 this new system is to capture all the elements
18 in the current system; be able to track
19 operations and changes in their certification
20 status over time; enable the certifying agents
21 to update the data manually in batch uploads
22 or in real time. So, we have a lot of

1 different types of certifiers out there that
2 have different technology capabilities, and we
3 need to provide a way for them to update that
4 information through different methodologies.

5 We have to have some kind of
6 permissions management to allow various levels
7 of viewing of the data; standard structured
8 fields for commodities; mapping capabilities
9 to locate operations; reporting capabilities
10 to support trend analysis and supply chain
11 research. And we are looking at an optional
12 way of having certificates generated from this
13 database.

14 So, we are in the very preliminary
15 stages of this. We are very excited about
16 this project. So, stay tuned as we continue
17 to develop this.

18 Moving on to the farm bill, and
19 Betsy Rakola will give more details on the
20 farm bill, but I will cover some of the NOP-
21 specific areas. We have, under the 2014 farm
22 bill, improved enforcement authority for NOP

1 to conduct investigations. We have already
2 used our subpoena authority under that new
3 authority that we have under the 2014 farm
4 bill.

5 We have the \$5 million upgrade for
6 technology and, then, for cost-share the
7 National Organic Certification Cost-Share
8 Program has been reauthorized. So, we have
9 gotten that program up and running. We just
10 recently sent direct mail to all the U.S.
11 certified organic operations. I heard this
12 morning that we might have had a little
13 challenge with some of the addresses, but we
14 will try to work that one out.

15 Okay. And then, on to the
16 National Organic Standards Board, I just
17 briefly wanted to make a couple of comments
18 about the National Organic Standards Board
19 and, then, I will wrap it up.

20 So, we had a listening session on
21 October 16th, where we held a telephone and
22 online listening session about the National

1 Organic Standards Board. I opened that
2 session with a presentation about the National
3 Organic Standards Board. I specifically
4 requested input on what parts of the NOSB
5 process is working well and specific ideas on
6 how we could make further improvements to the
7 process.

8 We set up the call to allow each
9 commenter to provide three minutes of
10 comments. We expected lots of commenters.
11 So, that is why we had limited it to three
12 minutes and wanted to provide time for many
13 voices to be heard.

14 We had approximately 60 community
15 members that listened to the call and we
16 received 10 comments. Eight of the comments
17 expressed disapproval of the changes to the
18 sunset process and changes to the way that we
19 have been working with the National Organic
20 Standards Board. One commenter supported the
21 sunset changes and one commenter had questions
22 about certification.

1 Given the comments that we
2 received at the spring meeting, I was
3 surprised that we received so few comments at
4 this listening session. Now there could be a
5 lot of reasons why we received so few
6 comments. We got the notice out about a week
7 before the listening session. But,
8 nevertheless, we got only 10 comments. We had
9 reserved two hours for the listening session,
10 but we ended the call after 45 minutes because
11 there were no additional commenters.

12 So, my takeaway on the listening
13 session is that there is strong opposition to
14 the changes to the sunset process. Some
15 organizations believe that the changes do not
16 align with the Organic Foods Production Act
17 and are not in the best interest of consumers
18 or the organic community. In addition, some
19 expressed concern about the authority or the
20 independence of the National Organic Standards
21 Board.

22 I would also say that in my

1 travels, my communication with people in the
2 organic community over the last year, that I
3 have heard that a number of people are not
4 willing to speak out about some of the
5 controversial organic topics. There is a
6 climate of intimidation, where individuals
7 fear that they might be attacked for
8 expressing certain opinions.

9 I have spoken to many organic
10 community members that agree with the changes
11 that we have made to the sunset process and
12 what we are doing at the National Organic
13 Standards Board, but they are not willing to
14 speak up about it.

15 Many organic community members are
16 busy farming and marketing. Most of their
17 concerns in terms of when I talk to them are
18 about weed control, soil management, and
19 livestock health. They are dealing with some
20 very difficult issues around drought and other
21 environmental stresses. I hear a lot about
22 GMO contamination and consistency about the

1 certification process and rules.

2 So, we have a lot of work to do.
3 There are hundreds of thousands of people that
4 work in organic agriculture and trade in the
5 U.S. alone. There are millions of consumers
6 that buy organic products and have confidence
7 in the USDA organic seal.

8 We are a very passionate bunch
9 from a diversity of backgrounds and
10 experience. I hope we can embrace our
11 collective diversity, continue to have
12 spirited debates about organic standards and
13 policy, and celebrate organics from the small
14 farm to the large corporation, from the local
15 markets to international trade, all efforts
16 that help to make the planet more sustainable
17 for people and the environment.

18 So, I think we need to have these
19 deep discussions and debates. And at the end
20 of the day, hopefully, we can all remember
21 that we are all part of the same movement, the
22 same organic community, to try to make the

1 world better for organic agriculture.

2 And with that, I want to thank the
3 service of a few of the National Organic
4 Standards Board members which this is their
5 last meeting. Joe Dickson, Jay Feldman, John
6 Foster, and Wendy Fulwider, thank you so much.

7 I brought up a picture of our
8 discussions about five years ago about corn
9 steep liquor. I just thought you would just
10 want to relive that moment.

11 (Laughter.)

12 Yes, so we still have some very
13 good debates. Five years ago it was corn
14 steep liquor, and now I don't know; we will
15 see at this meeting what will be the big issue
16 for this meeting.

17 (Laughter.)

18 But that was a lot of fun. It is
19 kind of interesting to see the setup there in
20 that photo where we are a lot more, I guess,
21 technologically sophisticated now than we were
22 five years ago. But that is Wisconsin five

1 years ago.

2 So, thank you, all four of you,
3 for your service. It is really an incredible
4 honor for me to work with each of you. You
5 have provided so much to the organic
6 community, the countless hours that you
7 dedicate to developing proposals, listening
8 and reading public comment, and coming up with
9 the recommendations. You really deserve a lot
10 of respect, and thank you.

11 (Applause.)

12 Okay. So, thank you, Madam Chair.

13 CHAIR RICHARDSON: Thank you,
14 Miles.

15 Before we go on to our next
16 presentation, I would like to ask the members
17 of the Board, do you have any questions of
18 Miles on his report here this morning?
19 Anything that is missing that you wanted to
20 hear about, any questions or concerns?

21 Yes, Francis?

22 MEMBER THICKE: Miles, what is

1 your feeling on international integrity,
2 especially in countries where we don't have
3 agreements, like China and such?

4 MR. McEVOY: Yes, well, there's a
5 lot of countries that have organic production
6 and are providing organic products to the U.S.
7 There's a lot of countries that their internal
8 organic market is also growing, that we are
9 exporting organic markets to.

10 The organic certification system
11 is the same here in the U.S. and in those
12 foreign countries under the direct
13 accreditation route that we have. So, for
14 instance, you mentioned China. There are
15 primarily four certifiers that operate in
16 China that certify to the U.S. organic
17 standards. So, they are complying with the
18 same requirements. They are audited by our
19 staff.

20 We have actually sent a couple of
21 teams. We sent a team on a month-long audit
22 in 2010 that we followed four products from

1 the farm to the port. And then, we did a
2 followup in 2012.

3 So, we see that it is not really
4 any different there than in any other country
5 where you find some minor problems that need
6 to be addressed, as in any audit, but it is
7 the same certification system there as in the
8 U.S. or in countries that we have equivalency
9 arrangements with. But we need to continue to
10 monitor and ensure that that stays true.

11 CHAIR RICHARDSON: Harold?

12 MEMBER AUSTIN: Miles, you know,
13 you mentioned the kind of dismal turnout for
14 the last listening session. Any thoughts,
15 looking ahead to future listening sessions,
16 and some potential ways to get some of those
17 other organic stakeholders, the producers, the
18 handlers, to participate in future calls?

19 MR. McEVOY: Well, we are going to
20 be doing a number of webinar listening
21 sessions on a number of other topics over the
22 next six months. And Betsy Rakola, the USDA

1 Organic Policy Advisor, will talk about that.

2 I think that what we need to do is
3 probably earlier notification, make it well-
4 known that we are doing these sessions earlier
5 on, that that could help. And, yes, we have
6 to think about that to see how we could get
7 better, more participation. That would be
8 great.

9 CHAIR RICHARDSON: Jay?

10 MEMBER FELDMAN: Miles, thank you
11 for your presentation.

12 I would like to explore a little
13 bit just on this use of the word
14 "intimidation" because that is a pretty strong
15 word, and any thoughts you would have on how
16 to address that within the organic community.

17 Obviously, given the diversity of
18 knowledge around the table here and in the
19 audience and among the participants in
20 meetings like this, you have different
21 viewpoints. Everybody is encouraged to
22 express those viewpoints.

1 Some may perceive the expression
2 of a viewpoint as intimidation, especially
3 when it may come from the consumer side, where
4 there might be an apparent threat that, you
5 know, if certain standards or expectations
6 aren't met, as written in the Policies and
7 Procedures Manual, we could lose market or we
8 could damage the seal, the USDA seal. Nobody
9 wants that.

10 And so, since you threw that word
11 out there, I am curious if you have any ideas
12 beyond the earlier notice of listening
13 sessions, and so forth, of how this community,
14 all the dedicated people in this room can feel
15 that they are expressing themselves without it
16 being characterized or being felt or received
17 as intimidation.

18 MR. McEVOY: Yes, well, I think
19 that people should -- I think it is really
20 important for us to recognize that there is
21 within the organic community those that are
22 feeling less willing to speak out. So, I

1 think that should be a discussion that we
2 have. Why? Why is that happening?

3 But I think, on the other hand,
4 that the people that are not should speak up
5 and have their opinion heard. I think it is
6 really, really important for this community to
7 thrive, to have a robust and full discussion
8 with all the viewpoints expressed. So, I am
9 encouraging those that are feeling unwilling
10 to speak up to speak up. It is really
11 important that their voices are heard.

12 CHAIR RICHARDSON: Calvin?

13 MEMBER WALKER: Miles, I had this
14 question I believe answered at the training
15 session, but I think it will be good to share
16 with the audience.

17 At universities we have what we
18 call program income. Any monies that we
19 collect goes back into the program. Could you
20 explain to us again monies from enforcement,
21 like the \$81,000, you all are not able to use
22 that for NOP purposes?

1 MR. McEVOY: Right. Money that is
2 collected on civil penalties just goes into
3 the Federal General Fund. That does not go
4 into the NOP or AMS budget, no.

5 CHAIR RICHARDSON: Well, if I may
6 ask a question, I get a lot of questions from
7 around the country when I go around wanting to
8 know, we all worked so hard for the farm bill;
9 what happened to the budget? And they want
10 more details and more information on the NOP
11 budget, how the money is distributed between
12 the various pieces of what you do.

13 And again, it is, in part, I would
14 like more information on that because there
15 are also people in the broader community that
16 express concern that there isn't that much
17 interest in organics at the USDA, and they
18 want to really know how is that money being
19 spent.

20 And I don't expect you to come up
21 with an answer at today's meeting. But I am
22 wondering if it would be possible for you to

1 provide us all with some greater detail. You
2 know, you throw out little snippets of money
3 now and then, which is good. But I am really
4 interested in a broader understanding of how
5 our tax dollars are being spent on organics
6 through the NOP.

7 MR. McEVOY: So, yes, we can
8 certainly provide additional information about
9 how the NOP budget is being utilized, and we
10 can prepare additional information to share at
11 the spring meeting, if that would work.

12 CHAIR RICHARDSON: Other questions
13 from Board members?

14 (No response.)

15 So, our next presentation -- thank
16 you, Miles -- presentation is Betsy Rakola.

17 Yes, you come up to the podium.
18 Great.

19 MS. RAKOLA: Good morning,
20 everyone. Thank you for allowing me the time
21 to speak.

22 I have been with the USDA for

1 about four-and-a-half years now, but this is
2 the first time I have been to an NOSB meeting.
3 So, it is nice to put a lot of faces with the
4 names that I have only seen over email and in
5 writing for all these years.

6 Wait just a moment for the
7 presentation to come up.

8 Well, I will just start giving an
9 overview of the topics I am going to talk
10 about.

11 So, I am the USDA Organic Policy
12 Advisor.

13 Great, here we go. Whoops.
14 Sorry, I hit the wrong button there. Let me
15 go back. All right.

16 So, I just wanted to give an
17 overview of what that means, what my role is
18 at the USDA, and talk a little bit about how
19 we are updating our Organic Literacy
20 Initiative, give you an overview of the work
21 that the Organic Working Group does, and talk
22 about our plans for stakeholder engagement.

1 And, Jean, by the time I am done,
2 I hope you will be able to tell people that
3 there is a lot of interest in organic at the
4 USDA, and more specifically, what it is we are
5 going about it.

6 So, I am the second USDA Organic
7 Policy Advisor. Many of you knew my
8 predecessor Mark Lipson. Mark left the USDA
9 last month at the end of his second appointed
10 term.

11 One of the changes with having me
12 onboard is that I am now in a permanent staff
13 position. While it is a bit of a
14 technicality, I think it is important to know
15 that that means that the Department has made
16 a permanent commitment to having a Policy
17 Advisor onboard to look at implementing the
18 work of organic agriculture across the USDA
19 for the long-term. And I think that is a
20 really big deal. It is a very exciting thing,
21 and it means that, regardless of who is
22 sitting in any political chair, my position

1 will continue to exist, so that we always have
2 a high level of leadership on organic at the
3 Department.

4 I do sit quite close to the Office
5 of the Secretary. I have a weekly briefing
6 with the Secretary's Deputy Chief of Staff to
7 inform him about the work that we are doing.
8 So, there is a lot of interest and engagement
9 on organic at the highest levels of the USDA
10 leadership.

11 One of the things that I do is to
12 coordinate the USDA Organic Working Group.
13 This is a cross-departmental working group
14 that has representation from every single
15 agency at the USDA, participating to discuss
16 how we can coordinate the work that we do on
17 organic agriculture, how we can integrate it
18 more deeply into the day-to-day work of
19 agencies, regardless of whether or not they
20 have a specific farm bill program that works
21 on organic or if there are just ways that we
22 can understand how their programs might be

1 tweaked or simply better explained, so that
2 they can work to serve the needs of organic
3 producers and handlers.

4 We have over the last couple of
5 years started to develop fiscal-year-specific
6 action plans, so that we can look at really
7 developing measurable impacts for the organic
8 community.

9 I am also responsible for
10 implementing the USDA's 2013 Departmental
11 Guidance on Organic Agriculture. So, I don't
12 know if folks are aware of this, but in May of
13 last year Secretary Vilsack issued guidance to
14 the entire Department instructing all of our
15 agencies to support the work of organic
16 agriculture and, again, to integrate it into
17 the day-to-day missions of their various
18 agencies, which has really given us that high-
19 level support that we need to have the
20 justification to be asking all of these
21 different groups to work with us on organic
22 and to make sure that it has a seat at the

1 table and it is always a part of the
2 conversation.

3 I also participate on a number of
4 other interagency initiatives. Organic is, by
5 no means, the only one. So, I try to provide
6 the perspective of organic on the different
7 initiatives that the USDA has going on.

8 So, this ranges from the work that
9 Miles mentioned that we have been doing on the
10 implementation of the Food Safety
11 Modernization Act; coexistence, which is, of
12 course, a hot topic with concerns about
13 genetically-modified organisms, and it is an
14 area where there is genuine interest at the
15 USDA to try to find workable solutions for all
16 producers.

17 I sit on the leadership team of
18 the Know Your Farmer, Know Your Food Task
19 Force, and I also participate in the Climate
20 Change Initiatives and Beginning Farmers and
21 Ranchers. So, it is a lot of meetings, but
22 folks are aware that organic is important, and

1 they are making sure to include us in the
2 conversation, which, again, is a very positive
3 thing.

4 So, Miles mentioned the USDA's
5 Organic Literacy Initiative. This is a series
6 of training and outreach materials that we
7 launched back in 2012, with the hope of trying
8 to provide some plain language resources on
9 what organic means and, also, a summary of how
10 the USDA supports it.

11 You can see those are some
12 snapshots up on the screen of the various
13 tools that we have. On the left are the
14 webinars that we have. We have been calling
15 them USDA Organic 101 and 201, our super-
16 short, 15-minute overview, and then, our
17 slightly-longer 30-minute, slightly more in-
18 depth overview for those who are interested in
19 more details on organic, as well as our
20 brochure that summarizes the different
21 programs and services that the USDA has, with
22 the hopes of helping people answer the

1 question, is organic an option for me?

2 And then, we have a very detailed
3 Resource Guide that goes through all of our
4 programs and provides information on how
5 different agencies support organic, as well as
6 websites, and names, phone numbers, and
7 emails, because we know that what people often
8 really want is just to talk to a human being,
9 to get some answers to their questions.

10 We are currently in the process of
11 updating this initiative. These are just a
12 few more details on each one of these
13 resources.

14 And we have had a lot of success
15 so far. With our Organic 101 and 201
16 trainings, we have focused on really get them
17 out within the USDA, to make sure that our
18 staff know what organic is, that the USDA
19 supports it, and how to connect producers and
20 handlers with resources.

21 And it has been successful beyond
22 my wildest dreams. We have had over 30,000

1 USDA employees complete this training online.
2 We have about 100,000 employees at the USDA.
3 So, you can do the math. It is a huge portion
4 of our workforce. So, people are much more
5 informed about organic than they were in the
6 past, and we are having a much better starting
7 point for our conversations of figuring out
8 how different agencies can support organic
9 producers and handlers.

10 We are currently in the process of
11 updating all of these materials to make sure
12 that they reflect the current that we are
13 doing and any changes that may have happened
14 in the most recent farm bill.

15 And we would really love feedback.
16 If folks in the room are using these tools, we
17 would love to hear from you. Are they useful?
18 Do they hit the high points? Are there things
19 that we are missing?

20 We have gotten a lot of
21 information out there, but we tend not to hear
22 much about how they are used and whether or

1 not they are useful. So, if there are
2 thoughts about how these could be tweaked or
3 changed, we are in that process right now.
4 So, it would be a great time to let me know
5 what you think.

6 So, we do have a new farm bill
7 finally. We are very excited about it. And
8 organic did quite well in the most recent farm
9 bill. So, several programs that had
10 previously been funded have now, again, gotten
11 funding. Some of those, like the Cost-Share
12 Program, got a lot more money than they had in
13 the past. The Cost-Share Program itself has
14 about doubled the annual budget that it used
15 to have.

16 And there is a lot of work that
17 has been going on to try to get the farm bill
18 implemented and off the ground. Since we did
19 get it midway through the year, it has been a
20 bit of a scramble, but things are underway and
21 we are getting, hopefully, back to normal with
22 a lot of these programs.

1 The Organic Research and Extension
2 Initiative is now funded again and has been
3 tweaked a bit to include educational
4 activities as a new category of eligible
5 projects. Previously, it was only focused on
6 research or extension. Now you can actually
7 submit a proposal whose primary purpose is to
8 do outreach and education.

9 That is another thing I think is
10 very exciting, and I hope that people
11 recognize, because it does open the door to
12 something that is really needed to provide,
13 again, that one-on-one personal touch to work
14 with our organic producers and handlers.

15 The OREI awards for the past year
16 were just announced at the end of September,
17 and they expect that the new request for
18 awards will be published very soon on the
19 National Institute of Food and Agriculture's
20 website. So, if you are an institution that
21 would be interested in applying or if you know
22 folks who may be, please tell them to stay

1 tuned.

2 As Miles mentioned, we just did a
3 big mailing to let people know about the Cost-
4 Share Program. We understand folks are
5 talking about the mixup in the addresses, but
6 I think the fact that they are talking about
7 cost-share is a good thing, regardless of what
8 the topic is. We want to make sure that they
9 know about it. We want to have anyone who is
10 interested take advantage of those funds. We
11 now can provide reimbursements, I believe,
12 under the current funding to anyone who is
13 certified. And we want to get as much of that
14 money out there as we can.

15 The Organic Data Initiative is
16 another area that was restored in the farm
17 bill, and we now have a new pot of \$5 million
18 for data collection on organics. So, that
19 might be a little cryptic, but what we are
20 doing with this is trying to expand the price
21 information that we have available through the
22 AMS Market News Program on what people are

1 getting paid for organic products around the
2 country. Some of this information is very
3 specific to different regions. And the Market
4 News team is actually also going to be
5 expanding the local and regional Market News
6 data, so that it is really very
7 differentiated. And wherever you are selling
8 your product, hopefully, this will provide
9 more information, so that you can know what a
10 fair price is to either charge or to pay for
11 organic products.

12 One of the end goals of this
13 year's Organic Data Initiative effort is to
14 try to assist the Risk Management Agency in
15 providing new crop insurance tools for organic
16 producers. There are a small number of
17 commodities that currently have specific
18 organic price selections. So, that if you are
19 buying a crop insurance policy and you have a
20 crop loss, you can actually get paid out at
21 the organic market price versus the
22 conventional market price, which, as we know,

1 typically can be a big difference in terms of
2 the farmer's pocketbook.

3 So, we are working with the Risk
4 Management Agency to try to help them develop
5 more specific price selections for more crops,
6 especially in the fruit and vegetable arena.

7 There are also other options for
8 organic crop insurance that have been
9 expanding. This year they announced the
10 contract price election tool. So, even if
11 someone is not growing a crop that currently
12 has a specific price selection with RMA, if
13 you have a contract and you can show that
14 contract to the insurance provider, you can
15 get an insurance contract on that specific
16 price, which really expands the options for
17 organic.

18 And something I think a lot of
19 people have been waiting for, in the next
20 probably couple of months, we are going to be
21 seeing a whole farm insurance product that is
22 really going to address the needs of our

1 highly-diversified particularly specialty crop
2 farmers and make organic crop insurance a much
3 more accessible tool than it ever has been in
4 the past, hopefully, with a lot less
5 paperwork. So, again, stay tuned for that.
6 We will be sharing a lot of information.
7 Hopefully, this will be a really important way
8 for producers to be able to mitigate the risk
9 that is inherent in organic production.

10 I also want to mention the farm
11 bill developments for the exemption to
12 Research and Promotion Boards, which are
13 commonly known as Checkoff Programs. The farm
14 bill did provide a provision that would exempt
15 certified organic operations from having to
16 contribute to those Boards. And that rule is
17 in process and should be available for public
18 comment within the next few months.

19 As you probably all know, there is
20 also the option in the farm bill for the
21 industry to propose an Organic Checkoff
22 Program. There is really not much that we can

1 say as USDA on this at this point. It is
2 really up to the community to decide what it
3 is that you want, but the USDA does stand
4 ready to respond in the event that a proposal
5 does come to us.

6 So, I want to circle back to the
7 Secretary's Guidance and the Organic Working
8 Group. Within Secretary Vilsack's 2013
9 Departmental Guidance on Organic there were
10 really five main priorities or main themes.
11 And that is how we have organized the work of
12 the Organic Working Group.

13 We have formed what we have called
14 Project Action Teams. Again, we are really
15 trying to focus on tangible actions and
16 impacts. And the five areas are training and
17 outreach, supporting the transition to
18 organic. The third one is always a little
19 cryptic, regulatory reciprocity, which is
20 really reducing paperwork. I think that will
21 become clearer as I give some examples.
22 Research and data.

1 I should emphasize that the
2 Organic Working Group, we have a listserv of
3 over 100 people within the USDA. We typically
4 have 25 to 30 active members at any of our
5 meetings. So, it is a pretty significant
6 group.

7 So, I am going to go through each
8 of our project teams and talk a little bit
9 about what we are going to be doing over the
10 next year.

11 So, our reciprocity team, again,
12 this is looking at how we can reduce the
13 amount of paperwork, reduce the amount of
14 bureaucracy that we are requiring of any
15 farmer to make it easier for them to
16 participate in our programs.

17 The top, I think, work that we
18 have going on is really in the area of
19 conservation. The National Resources
20 Conservation Service and the National Organic
21 Program have been working together for the
22 last year or two to coordinate the

1 Conservation Program requirements on the NRCS
2 side with the requirements that we at the NOP
3 have for an Organic System Plan.

4 So, the NRCS has actually
5 developed a new template for conservation
6 activity planning that walks through exactly
7 what the requirements are of the organic
8 regulations for things like nutrient
9 management, soil health, livestock grazing,
10 the whole area of the maintenance and/or
11 improvement of natural resources, to make sure
12 that these two efforts are working hand-in-
13 glove.

14 My hope is that this will provide
15 a big leg up for organic producers, both in
16 conservation planning and actually
17 implementing organic and conservation
18 practices on their farms. And hopefully, it
19 will also help them with the paperwork. You
20 know, we always hear that, other than the cost
21 of certification, the paperwork is one of the
22 biggest barriers.

1 And so, if someone can walk into
2 an NRCS field office and get help filling out
3 this plan, it can get them a good part of the
4 way to having their OSP done. So, this is
5 really great stuff, and it will be rolling out
6 in the next few months with a lot of training
7 and outreach opportunities. So, do stay tuned
8 for that. And please, when you see the
9 information, if you could share it with your
10 networks, we would really appreciate that. We
11 want to get this out as widely as possible, so
12 that people can take advantage of the new
13 tool.

14 Another area -- and this is the
15 first time that we are announcing this
16 actually, so you are all getting a bit of a
17 sneak preview -- is a new streamlined
18 procedure for making non-GE label claims on
19 meat and poultry products. So, the Food and
20 Safety Inspection Service has been working
21 with the NOP to cut out some of the red tape
22 that had previously been required for

1 certified organic meat and poultry processors
2 to make non-genetically-engineered label
3 claims on their products.

4 So, as of last Friday, the Organic
5 Certificate is pretty much all that you need
6 to be able to make those claims. So, the meat
7 and poultry processors will now be able to say
8 that, if it is meat, that the animal was not
9 fed a genetically-engineered diet, or if it is
10 a processed product like a sausage, that it
11 was not made with genetically-engineered
12 ingredients. So, we hope this will just be
13 another tool that will show the value of
14 organic certification.

15 And the last thing, I previously
16 talked a little bit about crop insurance, but
17 we have an additional effort going on with our
18 friends at the Risk Management Agency to
19 conduct what I am calling a needs assessment
20 of crop insurance documentation. So, we have
21 gotten some questions from organic certifiers
22 in recent months about why these insurance

1 providers are contacting them to get organic
2 system plans or organic inspection reports,
3 and why this is necessary for crop insurance.

4 So, we know that that can be a lot
5 of paperwork, and it is also often one of the
6 first or middle steps in the certification
7 process. It doesn't give a full picture of
8 the corrective actions or other communication
9 that has gone on.

10 So, we are going to be working
11 with the Risk Management Agency to see if
12 there are ways that we can streamline that
13 process and, again, reduce the paperwork
14 burden on our organic producers.

15 We also have a team working on
16 research. That team specifically responds to
17 the National Organic Standards Board's
18 research priorities every year. So, they had
19 done that back in the spring. Once the
20 research priorities are finalized at this
21 meeting, they will again take a look at those
22 and provide some feedback.

1 They have been keeping up with the
2 development of these goals throughout the
3 process, and they are very engaged to make
4 sure that they are feeding any needs for
5 research, particularly on regulatory topics,
6 into the requests for applications in the
7 USDA's various research funding programs.

8 Another goal that they have for
9 the coming year is to conduct a stakeholder
10 needs assessment of critical organic research
11 priorities. They want to make sure that they
12 are hearing from all of the voices out there,
13 so that we make sure that any research that is
14 funded is informed by those needs that have
15 been identified by our stakeholders. And I
16 think the hope is, by developing a White Paper
17 or something similar, that we can get that
18 information out to a broader audience, so that
19 that information isn't just held within the
20 USDA.

21 I wanted to just highly a couple
22 of other things going with research at the

1 USDA. As I mentioned, the Organic Research
2 and Extension Initiative did just announce
3 their most recent awards. And last week they
4 actually had a meeting in D.C. with all of the
5 national program leaders who are conducting
6 organic research around the country. So,
7 there are a few topics that I wanted to
8 highlight that I thought might be of
9 particular interest to the Board and to the
10 folks in the room here.

11 There is a lot of work going on
12 with the Agricultural Research Service on
13 public corn breeding to make sure that organic
14 producers have access to what they are calling
15 elite cultivars, the best of the best. Some
16 of the areas that they are looking at is
17 increasing the methionine content of corn,
18 which would, of course, directly address some
19 of the concerns that we have around making
20 sure our organic poultry have the nutrition
21 that they need. And also, lack of pollen
22 receptors to breed corn that does not accept

1 the pollen from a genetically-modified
2 organism, to make available another tool for
3 coexistence.

4 And also, some research going on
5 within a different Agricultural Research
6 Service facility to look at natural strategies
7 to alleviate enteric pathogens in poultry.
8 So, they have some very promising research
9 coming out about the potential for essential
10 oils to be able to lower the salmonella rate
11 in chickens, another piece that will be
12 important for us as we are developing our
13 animal welfare and looking at poultry that has
14 more access to the outdoors.

15 Another area where there is a lot
16 of research going on is cover cropping and no
17 till systems in organic agriculture. This
18 area has a lot more variability and a lot of
19 attention. And the research seems to be
20 highlighting the challenge of how we
21 sufficiently can kill our cover crops in order
22 to make sure that there is not excessive

1 competition, once the organic cash crop is
2 planted.

3 And there is also a lot of
4 research going on on trying to assess the
5 impact that organic practices have on climate
6 change mitigation. Also, a lot of research
7 going on, a lot of challenges in trying to
8 capture the data accurately, but important
9 research, I think, to feed into the larger
10 conversation.

11 One of the things that I thought
12 was very interesting was that several of the
13 scientists commented on the challenge of
14 replicating organic systems in a research
15 environment; that organic farming systems are
16 often simply too sophisticated and too unique
17 to be replicated simply on a research
18 operation.

19 So, I thought that was kind of a
20 compliment to organic farmers at large. And
21 it also highlights the need to make sure that
22 we are doing research on the farm as well, so

1 that we are truly capturing what is going on
2 out in the world of organic production.

3 I also wanted to mention that we
4 recently had a visit from the Rodale
5 Institute. As some of you may have heard,
6 Coach Smallwood did a 160-mile walk from
7 Kutztown, Pennsylvania to Washington, D.C.
8 And so, we had a meeting with them when they
9 arrived here about the White Paper that they
10 have put out on the potential of organic to
11 mitigate the effects of climate change and to
12 share some information between our research
13 agencies, our Climate Change Office, and our
14 conservation programs on what we might be able
15 to do together.

16 So, there are some very promising
17 conversations that came out of that, and it
18 was, I think, also good to have an outside
19 speak on behalf of what is going on with
20 organic, which sometimes can be more
21 meaningful than those of us who work inside
22 the USDA.

1 So, I just wanted to highlight
2 that and say that, if anyone else would like
3 to pay us a visit, you are always welcome.

4 The next project team I want to
5 highlight is our data team. The data team has
6 been working for the last year on conducting
7 an inventory of data across the USDA regarding
8 organic and non-genetically-engineered
9 agriculture. So, we are putting what we hope
10 are the finishing touches on that and hope to
11 have that available to the public this year,
12 to highlight just the information that is
13 available for those that are interested.

14 The group is also working on
15 improving trade codes, so that there will be
16 better tracking of exports and imports in
17 organic. If you have ever looked at organic
18 trade, you will know that there is very
19 limited data available. We are only tracking,
20 I think, a couple of dozen commodities at this
21 point. And so, they are in the process of
22 trying to expand the information that is

1 available.

2 A couple of other highlights I
3 wanted to mention, specifically with the
4 National Agricultural Statistics Service, are
5 that we had a publication just recently on a
6 special tabulation from the 2012 Census. I
7 made the mistake of trying to print it and
8 discovered it was 216 pages.

9 So, if you have taken a look, it
10 is a really extensive look at the
11 characteristics of organic. They pulled out
12 both a national and a state-by-state look at
13 who is farming organically, how they are
14 farming, what they are producing, what their
15 profitability is. And it is really sort of
16 like a mini-census just looking at organic.

17 Some of the highlights from it
18 were information that said that organic
19 producers are much more likely to sell direct
20 to the consumer. Only 7 percent of all U.S.
21 farms sold directly to consumers while 42
22 percent of organic farms reported direct

1 sales.

2 Organic farms were much more
3 likely than other farms to invest in on-farm
4 renewable energy-producing systems, like solar
5 panels and wind turbines. And organic
6 producers were much more likely to be
7 beginning farmers, with 27 percent starting
8 farming in the last 10 years compare to 18
9 percent of all principal farmers. And they
10 are also, typically, younger, with 26 percent
11 under 45 years old compared to 16 percent of
12 all principal operators.

13 So, there is a lot of very good
14 data and I think a lot of interesting
15 information to inform us all about, you know,
16 who the organic community is, when we are
17 thinking about the policies that we want to
18 make.

19 In the same vein, NASS will be
20 publishing its next organic producer survey in
21 early 2015. They will be sending this out to
22 our entire list of certified operations. And

1 they really want to highlight how important
2 this data is. Without good data, we can't
3 make good tools.

4 One of the biggest users of this
5 data is our Risk Management Agency, which is
6 working, as I mentioned, very hard to try to
7 provide better crop insurance products. So,
8 I wanted to put out the call to all of you
9 that, when we get information out about this
10 survey, if you could please help us to share
11 that information with organic producers and to
12 communicate to them the importance of
13 responding to the survey, so that we do have
14 this information to make sure that we are
15 providing the best programs and services that
16 we can to them.

17 Our training and outreach team
18 this year again will be focusing on our update
19 and our re-release of the Organic Literacy
20 Initiative. And once that is done, we want to
21 work more with external partners to distribute
22 organic resources beyond the USDA.

1 You know, we had focused a lot on
2 getting our internal folks trained. And now,
3 we want to figure out how to move beyond that.
4 How do we really put these necessary tools in
5 the hands of those folks who have the boots on
6 the ground, who have that one-on-one contact
7 with farmers.

8 We did a Google Hangout earlier
9 this spring to talk about what the barriers
10 are to organic certification. And we heard
11 loud and clear that farmers want one-on-one
12 technical assistance. They want to be able to
13 talk to a human being who can answer their
14 questions about how it is that they can farm
15 organically.

16 So, we want to make sure that we
17 are working with those who have a field
18 presence to make that happen. One of the ways
19 that we are doing that is we are working
20 closely with the Farm Service Agency that is
21 trying to incorporate programs beyond their
22 typical mission and provide better outreach

1 and information to farmers. So, they have
2 taken organic as one of their pilot projects
3 to do that, and we hope that soon we will be
4 able to point to the Farm Service Agency as a
5 field resource for organic producers.

6 And our last team is focusing on
7 supporting the transition to organic. In some
8 ways, I think this is one of our most
9 challenging and most important areas. I mean,
10 we have had a goal in the USDA Strategic Plan
11 for several years now to increase the number
12 of certified organic operations, which is a
13 real challenge. It is not easy to get
14 certified, and we want to make sure that we
15 keep those standards strong. But we also want
16 to make sure that people who are interested in
17 participating in the plan can do so.

18 So, our plan is to look creatively
19 at the USDA, at all of our technical and
20 financial resources, and to think about them
21 in a different way, and think about how they
22 might be able to serve producers and handlers

1 who are looking at the transition.

2 So, one of the examples is we are
3 talking to the Farm Service Agency about how
4 the Conservation Reserve Program might be able
5 to fund farmers who want to retire a buffer
6 strip and actually give somebody some
7 financial payment for that conservation
8 practice that they are putting in.

9 So, it is things like that,
10 looking at existing tools in a new way and
11 trying to figure out how they can better serve
12 our organic producers.

13 Our end goal is to create websites
14 and fact sheets that summarize and explain
15 these resources, to facilitate the transition
16 to organic. And we are also looking at how we
17 might be able to incorporate resources outside
18 the USDA. We know there is so much good work
19 that is going on in the organizations that you
20 all work for, at organic certifiers, all
21 across the country that are helping people to
22 make that jump to organic certification

1 already. We want to see if we can't provide
2 a central resource for all of that. So, there
3 will be more to come on that soon.

4 The last thing I wanted to
5 mention, as Miles alluded to, that we will be
6 doing a big focus on stakeholder engagement.
7 We are doing a lot of outreach and education
8 over the coming year, which is because we
9 really do want to hear from you. We want to
10 hear from all of the voices in the organic
11 community.

12 So, we will be hosting a series of
13 webinars on the different topics, primarily on
14 the topics that the Organic Working Group is
15 focusing on. We are hosting those mostly in
16 the winter and early spring, so that it will
17 be a time when we hope that organic producers
18 will be less involved in farming and,
19 hopefully, more available to join us on one of
20 those webinars. We are hosting them
21 electronically, so that people don't have the
22 financial and time burden of having to travel

1 to see us in person.

2 And we will be starting in
3 November with a conversation on training and
4 outreach. So, as I mentioned, we are focusing
5 on how to get information out beyond the walls
6 of the USDA, and we hope that people will join
7 us to give us some creative ideas on how that
8 might happen.

9 We will also be doing as much
10 travel as we can ourselves in the fall and
11 winter conference season to make sure that we
12 are getting out there and making ourselves
13 available around the country to hear what
14 folks have to say, so that, again, we can
15 better inform the work that we are doing.

16 So, that is all that I have. I
17 just wanted to emphasize that I really am a
18 resource for organic within the USDA, and that
19 my job is to make sure that the USDA programs
20 work as well as they can for the organic
21 community, but I can only do that if I hear
22 from you all for what it is that we need to be

1 doing and what it is that we could be doing
2 better. So, please do think of me as a
3 resource. My contact information is there.
4 And we are very interested in hearing your
5 feedback.

6 CHAIR RICHARDSON: Thank you,
7 Betsy.

8 I would like to invite questions
9 from the Board for Betsy on the topics that
10 have been covered. Burning questions?

11 Yes, Joe?

12 MEMBER DICKSON: Thank you, Betsy.
13 That was an awesome presentation.

14 MS. RAKOLA: Thank you.

15 MEMBER DICKSON: The FSIS policy
16 change or streamlining on non-GMO or non-GE
17 label claims is really good news. But I
18 notice in your presentation you used the
19 phrase "non-genetically engineered" --

20 MS. RAKOLA: Uh-hum.

21 MEMBER DICKSON: -- versus "non-
22 GMO". Is there a Department thinking or

1 policy on those two phrases and which is
2 preferable or allowed under the guidelines?

3 MS. RAKOLA: I am not sure if
4 there is a policy at the level of the
5 Department. From what I understand, that was
6 consistent with the FSIS existing policies.

7 CHAIR RICHARDSON: Other
8 questions?

9 Jay?

10 MEMBER FELDMAN: Thank you for
11 your presentation, Betsy.

12 You used the term "coexistence".
13 And as you know, there is a raging debate
14 within the organic community as to how organic
15 over the long-term can coexist with a
16 technology that causes involuntary exposure or
17 genetic drift off the target site, and the
18 associated pain that that causes in reduced
19 value or the threat of litigation against
20 people that are drifted on or farms that are
21 drifted on.

22 I am wondering if there is a

1 process -- I know the Secretary has engaged on
2 this issue -- but how this Board and the
3 community that we hear from at every meeting
4 on this topic can work with you to better
5 articulate the concerns that are being heard
6 in this room on coexistence and the
7 difficulty, the daily challenges that people
8 are suffering as a result of genetic flow, a
9 gene flow off of the GMO crops.

10 MS. RAKOLA: Sure. And I think
11 the Secretary and the whole USDA are keenly
12 aware of the challenges of coexistence and are
13 actively trying to find workable solutions, so
14 that everyone can farm in the way that works
15 the best for them.

16 The Secretary's AC-21, which is
17 the Task Force on Biotechnology and
18 Coexistence for the 21st Century, is
19 reconvening, and they are actively seeking
20 information for solutions. We are in the
21 process of collecting all of the resources
22 that are out there and trying to make sure

1 that we are aware of all of the information
2 and tools that are available within the USDA
3 and without. So, if there are information
4 pieces that people would like to share, my
5 email is up there. I would be happy to pass
6 those on to the Committee to make sure that
7 they are shared, and that there will be future
8 opportunities for input and public comment.

9 MEMBER FELDMAN: Thank you.

10 CHAIR RICHARDSON: Other
11 questions?

12 (No response.)

13 Thank you, Betsy.

14 MS. RAKOLA: Thank you.

15 CHAIR RICHARDSON: I think it is
16 time now for a 15-minute break. I will be
17 very prompt in starting us off again at 20
18 minutes to 11:00.

19 (Whereupon, the foregoing matter
20 went off the record at 10:21 a.m. and went
21 back on the record at 10:39 a.m.)

22 CHAIR RICHARDSON: Let's get

1 started.

2 The next item on our agenda is a
3 materials update summary of new and
4 outstanding petitions. And Dr. Lisa Brines
5 will present this.

6 DR. BRINES: Thank you.

7 And just one clarification before
8 I dig in. Just a notice for those in the
9 audience that are keeping. There's a lot of
10 materials lists within this presentation. So,
11 the presentation as well as the earlier
12 presentations by Betsy and Miles earlier this
13 morning will be posted on the NOP website.
14 So, don't feel like you have to take all the
15 notes as we go through this.

16 So, just a reminder on the
17 evaluation criteria. For materials, the
18 criteria are established and provided for in
19 the Organic Foods Production Act. As we talk
20 about materials and petitions and sunset
21 materials throughout this meeting this week,
22 just keep in mind that the questions from the

1 Technical Reports as well as the NOSB
2 Checklist were developed as tools to align
3 with those OFPA criteria.

4 There are different criteria for
5 production uses versus handling. So, crop and
6 livestock materials use the Organic Foods
7 Production Act criteria. The handling, in
8 addition, have additional criteria for their
9 evaluation.

10 Specifically, processing aids and
11 adjuvants are evaluated under additional
12 criteria that are at 205.600(b). That is just
13 for synthetic handling materials. And in
14 addition, agricultural materials used in
15 handling are subject to additional criteria
16 for commercial availability as well.

17 Okay. So now, getting into the
18 lists in terms of what is outstanding with the
19 Board, there are no crops petitions on the
20 agenda for this meeting, but there are a
21 handful of materials that are petitioned
22 materials that are under review by the Board.

1 Again, this full list will be available on the
2 website, and I have asterisked a handful of
3 the materials that have technical reports that
4 are in development and that should be
5 available before the next meeting.

6 One additional note in terms of
7 the petition availability, the NOP posts the
8 petitions on the website at the time that they
9 are provided to the Board for review. So, all
10 these petitions are posted on our website
11 because they were submitted to the program,
12 determined eligible and complete, and then,
13 forwarded to the Board for review.

14 At any given time, we also have
15 other petitions that have been submitted to
16 the program that are under evaluation for
17 eligibility or might need revision by the
18 petitioner before they are provided to the
19 Board. So, those are the ones are not
20 captured under this slide. These are just the
21 ones that were determined eligible, complete,
22 and forwarded to the Board for review.

1 For the Livestock Subcommittee,
2 again, no petitions on the agenda for this
3 meeting, but there are a number of materials
4 that are under review by the Livestock
5 Subcommittee. All of the aquaculture
6 petitions are still within the Livestock
7 Committee's purview at this point, and there
8 is a handful of Technical reports that are in
9 development, including aluminum sulfate and
10 sodium bisulfate, which have similar uses for
11 treatment of poultry litter, and a petition
12 for zinc sulfate is under review and a
13 Technical Report is in development as well.
14 So, all of these petitions are currently
15 posted on the NOP website.

16 For handling, there are two
17 petitions that are under consideration by the
18 full Board at this meeting, including a
19 petition to remove glycerin from Section
20 205.605(b) of the National List, as well as a
21 petition to add whole algal flour to the
22 National List for use in organic handling.

1 There are a number of other
2 outstanding petitions under review by the
3 Handling Subcommittee. A couple of the ones
4 on the list there have been reviewed by the
5 Board at previous meetings, but a decision has
6 not been made, as well as they have a newer
7 petition for triethyl citrate which is under
8 review, and a Technical Report for that
9 substance is current in development. Again,
10 all of these petitions are currently posted on
11 the NOP's website.

12 For voting procedures for petition
13 substance, again, just a reminder that the
14 Board takes two votes for all petition
15 substances. The first motion is a
16 classification vote, generally only needed if
17 the substance has not been previously
18 classified by the full Board or if the Board
19 is contemplating a change to classification
20 for something previously classified. Things
21 would be classified either as synthetic or
22 non-synthetic or, for handling, agricultural

1 or non-agricultural as well.

2 The second motion for petition
3 substances is either a petition -- I'm sorry
4 -- a motion to list to remove or to amend.
5 So, that directs the program what your intent
6 is to do with that material.

7 And again, the majority needed to
8 pass those motions is a two-thirds majority of
9 the Board. So, with the Board today with 15
10 members, that would be 10 votes needed to pass
11 those motions. And that two-thirds majority
12 is established by OFPA.

13 Moving next into the sunset
14 materials, so the sunset 2015 materials, the
15 Board will complete its review of these
16 materials at the meeting this week. So, for
17 crops materials, this includes three sunset
18 substances, two listings for aqueous potassium
19 silicate. It is listed twice on the National
20 List under (e) as an insecticide and, also,
21 under (I) for plant disease control. There is
22 a listing, also, for sodium carbonate

1 peroxyhydrate on 205.601, and that is under
2 (a), and sulfurous acid which is on paragraph
3 (j) as plant or soil amendments. So, three of
4 those substances will have their review
5 concluded at this meeting.

6 And in support of its review, the
7 Crop Subcommittee did request updated
8 technical information for all of those
9 materials, which is made available to the
10 public as well in advance of the previous
11 meeting.

12 For handling, there are four
13 substances for sunset 2015: gellan gum, which
14 is a non-synthetic material listed on
15 205.605(a), and then, the other three
16 materials are listed as non-organic
17 agricultural materials on 205.606. So, we
18 have the two cooking wines, marsala and
19 sherry, as well as tragacanth gum on 606.

20 In support of its review, the
21 Handling Subcommittee did not request
22 additional technical information. So, they

1 are working off of existing reports and public
2 comment for those materials.

3 So, in addition to the 2015
4 materials that are under consideration at this
5 meeting, this week is also the first of two
6 meetings for the sunset 2016 materials. So,
7 we will be hearing comments for two crop
8 materials, ferric phosphate for slug and snail
9 control as well as hydrogen chloride, which is
10 used for de-linting cottonseed for planting.
11 And in support of its review, there was one
12 updated Technical Report requested by the Crop
13 Subcommittee to address the uses of hydrogen
14 chloride.

15 There are no 2016 materials for
16 the Livestock Committee, but there are a
17 number for Handling. I won't read through
18 this entire list, but I did asterisk the ones
19 that have updated technical information
20 available, which are tetrasodium
21 pyrophosphate, TSPP, as well as
22 microorganisms. So, 10 of those.

1 And for 2016 materials, the Board
2 won't be concluding its review until the
3 following spring meeting. So, this is the
4 first of two meetings where these materials
5 will be considered.

6 Okay. And I did just want to give
7 a preview of sunset 2017 materials. The
8 majority of materials on the National List are
9 scheduled to sunset in 2017. These materials
10 are not currently on the agenda for this
11 week's meeting, but the first of the two
12 sunset meetings for sunset 2017 would be next
13 spring.

14 So, we have got the complete list
15 that is available in a memo that we previously
16 published back in January. So, I would refer
17 you to that list for the complete list, but I
18 did want to just give a preview. Because
19 there are so many materials that are coming up
20 for 2017, I thought it would be helpful to
21 know what is coming down the line, as we have
22 been working with the Subcommittees.

1 We did work with them over the
2 summer to determine which materials might need
3 updated technical information. We have been
4 able to dedicate more than \$330,000 for
5 Technical Report development for sunset 2017
6 material. So, these are in development and
7 will be available for the public soon.

8 For sunset 2017 materials, I have
9 given the full list of Technical Reports that
10 are in development. The ones that will be
11 coming down the pike sooner in terms of being
12 posted on our website are probably ethanol and
13 isopropanol. The vitamin report for B1, C,
14 and E probably will be the last one to post.

15 I just wanted to point out one
16 specific one on this list, which is EPA List
17 4. We did receive a request from the Crops
18 Subcommittee to develop a Technical Report to
19 address EPA List 4, but limited to the class
20 of nonylphenol ethoxylates. So, we are moving
21 forward on that Technical Report. It is one
22 of the categories that have been identified by

1 the Inerts Working Group. So, we are moving
2 this one forward as part of the sunset review.

3 For livestock, we have a number of
4 reports that are in development. Again, the
5 ethanol and isopropanol reports will probably
6 be available to the public first.

7 We are also doing a number of
8 categorical listings that haven't been updated
9 with new technical information since around
10 1994-1995. So, new category Technical Reports
11 for excipients, electrolytes, and vitamins,
12 and we are doing a combined Technical Report
13 to address a few of the parasiticides on the
14 National List, which includes fenbedazole,
15 ivermectin, and moxidectin.

16 And the number of handling reports
17 that are in there, I won't go through this
18 full list. I will note that, for the
19 Technical Reports, some of these are limited-
20 scope Technical Reports. So, based on the
21 available information, there is not a full
22 Technical Report that the Subcommittee

1 determined was needed, but oftentimes just
2 specific questions or new information that
3 might need to be addressed. So, that will be
4 clearly marked on the Technical Report as it
5 is posted for the public, whether it is a full
6 Technical Report or just limited scope.

7 Some of these listings also have
8 been combined, just because of related uses.
9 So, for example, we plan on doing one
10 Technical Report that addresses citric acid
11 and it is three salts, which on the list there
12 includes calcium, potassium, and sodium
13 citrate.

14 All right. So, that's it for the
15 sunset. I do want to give just one slide on
16 an update about the petition process.

17 As you may recall, at the April
18 2014 NOSB meeting, the Board passed a
19 recommendation, two recommendations asking the
20 NOP to update the petition process. One makes
21 some changes to the petition guidelines which
22 are currently posted in The Federal Register

1 and haven't been updated for several years.
2 Another recommendation addressed the allowance
3 for confidential business information as part
4 of the petition process.

5 We are currently working on
6 implementing the changes that were recommended
7 by the Board. At the point at which those new
8 procedures are published in The Federal
9 Register, they will become effective. So, in
10 the meantime, we are still working off the old
11 petition guidelines, which do allow the
12 submission of confidential business
13 information. And we have been working closely
14 with petitioners that have submitted petitions
15 in this interim time to let them know about
16 the availability of that recommendation, and
17 they may want to consider that as they draft
18 their petitions, until the new procedures are
19 published.

20 And I think that is it. So, thank
21 you.

22 CHAIR RICHARDSON: Thank you, Dr.

1 Brines.

2 Are there any questions in regards
3 to this presentation? Any concerns or
4 clarifications that you need?

5 (No response.)

6 Well, you're getting off lightly
7 today, Lisa.

8 (Laughter.)

9 Thank you.

10 DR. BRINES: Thank you.

11 CHAIR RICHARDSON: The day is
12 still young, I am reminded. Yes.

13 So, before we move into public
14 comment, I have a few comments that I would
15 like to make as Chair. I waited to see what
16 the NOP would say, and I was at NOC yesterday.
17 So, I would like to try to bring our attention
18 to a number of items at this meeting.

19 I should start off by telling you
20 that I have a gavel, which I use when I am
21 quite cross, and it is not good for Jean to
22 get cross.

1 (Laughter.)

2 And I also have my scepter with me
3 to bless those who do good work.

4 (Laughter.)

5 So, I find it a great honor to be
6 Chair of this august organization, for which
7 we get paid absolutely nothing, but it is good
8 fun sometimes.

9 And I would like to just bring you
10 up-to-date very briefly with some NOSB items.

11 As you all recall, there were a
12 number of changes which the NOP made over the
13 last year or so. And some of these didn't
14 seem quite right. So, adjustments have been
15 made.

16 As you observed, the NOSB is once
17 again chairing the meeting. And Miles we have
18 surrounded by the Chair and the Vice Chair to
19 keep him under control.

20 (Laughter.)

21 The Charter, do you remember the
22 Charter? As we heard yesterday at the NOC

1 meeting, there was some confusion in the GSC
2 and they altered the NOSB Charter, so it
3 sounded like we would go away in two years.
4 That has been corrected, thanks to the work of
5 a number of people.

6 In the last few weeks, the NOP has
7 also reactivated the Policy and Procedures
8 Subcommittee, which, as you recall was
9 deactivated back in February. And the NOSB
10 will work collaboratively with the NOP to
11 rewrite the Policy/Procedure Manual and to
12 clarify sunset policy, which, as you know,
13 this is the first time we are doing this new
14 version of it. So, depending on how things go
15 at this meeting will determine to some extent
16 how we can aid in that clarification process.

17 We also expect that the Policy
18 Subcommittee will work on a new procedure for
19 annotations, which right now we have a lot of
20 limitations on. And especially, we are
21 interested in seeing the manner in which we
22 could do annotations at sunset, which

1 presently we can't do.

2 So, these are all really good
3 things, and there are other things, as you
4 have heard from the presentations from the NOP
5 staff today. And I am very confident that we
6 can continue to make improvements in our work
7 over the next year or two.

8 One of the things that I would
9 like you to be aware of is I do talk to the
10 Deputy Administrator every week. And you have
11 my phone numbers and you have my emails. So,
12 you have a direct connection at anytime to me
13 and to Miles through me, although, of course,
14 you can contact him directly as well. But
15 your concerns are carried forward very
16 quickly, and they are of great interest and
17 concern to all of us, that we try to do the
18 right thing at the right time, but we are all
19 human, remember. So, being tolerant of each
20 other is quite important.

21 The other thing that I have just
22 put up here, which Colehour kindly reminded me

1 to do so, is to remind everyone of our NOSB
2 mission statement and the vision statement for
3 what it is that we are all about. And it is
4 up there on the screen for you to review and
5 remind ourselves of why we are here and what
6 an important role we play in the limited scope
7 of agriculture that we really are involved in
8 in the United States and worldwide really.

9 I would like to move on to the
10 next slide, if I may, Michelle, as I try to
11 give us some broader context within which we
12 are working.

13 Like a lot of you here in this
14 room, I have been involved in the organics
15 long before there was the organic seal. And
16 while the typical consumer might not know that
17 Section 205.237 deals with livestock feed, as
18 we can see here in this cartoon -- these cows
19 are getting up-to-date -- we, by contrast,
20 really get into the weeds, literally and
21 figuratively.

22 But I was reminded recently, when

1 I gave a presentation to the National
2 Association of State Departments of
3 Agriculture, that we could lose our way and we
4 can forget that the general field of
5 agriculture and food production, even though
6 organics is a \$35 billion industry, it is only
7 about 3 percent of agriculture in terms of
8 dollar sales and only about 1 percent of
9 farmable land at the present time. So, it is
10 quite small when you put it into perspective.

11 And then, think about the USDA. I
12 don't know when the last time was you walked
13 around those hallowed halls. It is a huge
14 agency. And I found that, when you walk
15 around that cafeteria down there in
16 Washington, D.C., you can't even buy whole fat
17 organic milk, let alone cream line or non-
18 homogenized and, of course, heaven forbid,
19 raw.

20 (Laughter.)

21 So, now the NOP has been working
22 to increase organic literacy of the

1 inhabitants of that building, but there are a
2 lot of entrenched ideas and overcomplicated
3 rules and regulations and red tape, with which
4 we are all much too familiar, and many
5 competing interests.

6 And we, all of us, must work
7 within that system, whether we like it or not,
8 no matter how aggravating. At least we are a
9 democracy and we can air our dirty washing on
10 the line, which is hard to do in other parts
11 of the world.

12 And the Agricultural Marketing
13 Service, that component is actually very small
14 in the USDA. And then, the NOP is just a tiny
15 part of AMS.

16 Now when the OFPA and regulations
17 were being written, we were an even smaller
18 sector and there was almost no processed
19 organic food. Now processed organics are
20 growing fast, and we have to produce organic
21 food. However, we have to produce that
22 organic food within the context of our cheap

1 U.S. food policy, and this reduces slim profit
2 margins and increases competition, which leads
3 to stress and all kinds of other things.

4 The Europeans, by contrast, are
5 happy to pay much more for their food. So,
6 therefore, the farmers and the processors in
7 Britain and Europe can have much higher profit
8 margins for organic products.

9 So, we in this room have a
10 responsibility and must work to boost consumer
11 confidence, improve labels on products, reduce
12 consumer confusion, and maybe spend less time
13 and energy, on the one hand, suggesting that
14 our organic products may be dangerous to eat
15 or, on the other, complaining that the NOSB is
16 failing to give every producer and every
17 processor all of the chemicals that they want.

18 So, my plea with us all here today
19 is pick your battles. Working together,
20 building partnerships, it is absolutely the
21 only way to go. We are part of a complex
22 system. So, we should use systems thinking

1 from the farm as a system to the multi-
2 ingredient chocolate chip cookie production,
3 to the global marketplace, constantly
4 challenged by change, all kinds of change,
5 including climate change.

6 We have to remind ourselves that
7 everything is interconnected. And our
8 interlocking agricultural policies and
9 regulations must be used to strengthen those
10 connections and not destroy them. Because if
11 we can't work together -- and we are a small
12 group -- building partnerships between diverse
13 stakeholder groups, we may face the economic
14 and environmental "Tragedy of the Commons"
15 articulated many years ago by Garrett Hardin.

16 His theory outlined how
17 individuals acting independently and
18 rationally, each according to individual self-
19 interest, behaved contrary to the best long-
20 term interests of the whole group. And thus,
21 we deplete the common resource, such as soil
22 and water, or in this case we will lose our

1 market niche in organic food production.

2 It is not realistic to demand
3 absolutely no synthetics in anything with the
4 organic seal. And it is not realistic to ask
5 for every synthetic or every tool in the
6 toolbox.

7 And the NOP must work more
8 collaboratively with the NOSB in all aspects
9 of our work. Together, we have to move toward
10 common ground. We have to be proactive as
11 possible as a community, working with all the
12 changes; be sure we are asking the right
13 questions, and always thinking in an
14 interdisciplinary manner with systems
15 thinking.

16 So, let's seek common ground
17 together as we go into the rest of this
18 meeting, take our public comments, and work
19 through our Subcommittee actions that we have
20 to do today and the rest of this week.

21 Thank you.

22 (Applause.)

1 Do you have a comment?

2 MEMBER STONE: First, I want to
3 say thank you for that.

4 But, before we start public
5 comment, we implemented a little -- it is not
6 a policy, but a thing, that people that
7 respond to the stoplight system in the public
8 comment -- we have two categories: those that
9 time it so well that, when they say the last
10 word of their comment and right when the red
11 buzzer goes off, they get a prize, right? So,
12 it is either a cup or a T-shirt, a USDA
13 T-shirt, an organic T-shirt. All right?

14 (Laughter.)

15 And we owe two people -- and
16 Michelle and I couldn't remember because
17 several people -- the other category is, when
18 the red light goes off, they stop in mid-
19 sentence or mid-word in respect for that,
20 which all this is respect for each other's
21 time and ability to ask questions and all
22 that.

1 So, we owe a couple of people
2 T-shirts from the San Antonio meeting. Marty
3 refused his because it wasn't organic cotton,
4 but we can take that up with the Secretary.

5 (Laughter and applause.)

6 But we did bring a new supply of
7 cups and T-shirts for this meeting as well.
8 So, just that.

9 CHAIR RICHARDSON: Thank you, Mac.

10 So, Michelle, we are ready to
11 organize the public comment. I have a list
12 here. I don't know for sure if it is
13 absolutely up-to-date.

14 The first person that I have
15 listed on mine is Keith Freitas. Is Keith
16 here?

17 (No response.)

18 No?

19 Then, the next person that I have
20 on the agenda is Steve Etkka from NOC. Steve?

21 MR. ETKA: Good morning.

22 I am Steve Etkka. I am Policy

1 Director for the National Organic Coalition.

2 I wanted to start by thanking you
3 all for all the work that you do as NOSB
4 members. It is an intense job, but it is not
5 a thankless job because all of us are here
6 thanking you for the good work that you do.

7 And, Jean, I appreciated your
8 intro remarks.

9 As many of you know, NOC has been
10 very vocal about our concerns about the
11 unilateral changes in the sunset process made
12 by NOP last year. The Department's action is
13 a significant reinterpretation of the law,
14 which essentially turns OFPA on its head and
15 redefines the word "sunset" to mean exactly
16 the opposite.

17 Let me say the one thing upfront
18 is that one thing we do like about the new
19 process is that you all are starting the
20 process earlier, which, hopefully, will make
21 it easier to get through the materials you
22 need to get through.

1 Our concerns on the sunset policy
2 change have been many, but let me highlight
3 the main three.

4 Process, this is a major
5 reinterpretation of OFPA and it is highly
6 controversial. At the very least, the
7 Department should have proposed this as a
8 change through the formal public notice and
9 comment process.

10 Two, who makes the decisions? The
11 new sunset process has created a great deal of
12 confusion regarding the role of NOSB
13 Subcommittees versus the full Board in terms
14 of material listing decisions. While the
15 Subcommittees should be doing a lot of the
16 groundwork for considering materials, the full
17 Board should make the final decisions about
18 listing and relisting material.

19 To their credit, NOP staff has
20 spent a lot of time in recent months to
21 clarify that the full Board will be making all
22 the materials listing decisions, at least for

1 this meeting. But we are concerned, however,
2 that the mechanism used to make this happen
3 within the context of the new sunset review
4 process is very complicated and confusing and
5 tortured. Having all the Subcommittees vote
6 to remove all materials up for sunset review,
7 and then, having the Subcommittees take an
8 additional vote on the same material to
9 actually say what they really think about it
10 is very confusing.

11 And that leads to our final
12 concern about the policy, which is, what is
13 the Board voting on? Is it voting on
14 relisting or delisting? And we strongly
15 believe that OFPA is very clear in its
16 presumption of no synthetics as a standard of
17 organic and that the law intentionally
18 establishes a high hurdle of a super-majority
19 NOSB vote in order to allow a synthetic to be
20 used for five years, and that same high hurdle
21 for it to be relisted.

22 If that standard is not met, the

1 law is clear that the material goes off the
2 list. When the sunset vote is on the question
3 of whether or not to relist, it becomes much
4 more simple and direct.

5 We agree that there are process
6 changes that need to be made. In that
7 context, we have given to all of you a White
8 Paper about making sure that there is a clear
9 record of decision for each material that is
10 up for review. That helps both you all and
11 the public be fully informed about the past
12 decisions made and about where the gaps are
13 that need to be filled. Prioritizing this
14 work is really important.

15 We also want to thank you for the
16 research priorities you have laid out and
17 thank NOP for relaying those priorities to
18 NIFA, the research arm of USDA.

19 Also, in closing, I wanted to just
20 thank all of the outgoing members, Jay, Wendy,
21 John, and Joe, for your hard work, and to say
22 enjoy the newfound free time.

1 CHAIR RICHARDSON: Thank you,
2 Steve.

3 Questions?

4 (No response.)

5 Thank you.

6 MR. ETKA: Thanks.

7 CHAIR RICHARDSON: The next
8 speaker is Mark Kastel.

9 MR. KASTEL: Thank you, Madam
10 Chair.

11 Why should organic stakeholders
12 continue to come to the NOSB meetings? Groups
13 like the Cornucopia Institute or Beyond
14 Pesticides have four minutes to speak to you
15 folks. We represent 10,000 members. And we
16 are covering all the materials and all the
17 policies that you are deliberating on.

18 We had a wake-up call a few years
19 ago when two \$12 billion companies, Martex and
20 Dean Foods WhiteWave, spent almost an hour
21 petitioning on just one material because they
22 could afford to fly numerous corporate

1 executives and lobbyists and lawyers into this
2 room.

3 We use citizen lobbyists, farmers,
4 and other stakeholders. And I hope you will
5 give them respect when they are speaking to
6 you today.

7 Why should we come to this
8 meeting? The NOSB had always been the focus
9 for the organic community of resolving policy
10 issues.

11 I will remind many of you in this
12 room that it was 10 years ago that the
13 Cornucopia Institute and the Northeast Organic
14 Dairy Producers Alliance facilitated many
15 farmers to come in and testify. We convinced
16 the NOSB that cracking down on factory farms
17 with no pasture, putting farmers at a
18 competitive disadvantage, and cheating
19 consumers should be a priority, and you did
20 that.

21 Now the NOSB is stripped of its
22 authority to set its work plan and own agenda.

1 This is contrary to the Organic Foods
2 Production Act that mandates that this Board
3 advise the Secretary on implementing the Act.

4 The changes to the PPM are a
5 betrayal. The Policy and Procedure Manual was
6 developed in consultation with organic
7 stakeholders, deliberated by the Board,
8 passed, and then recommended to the USDA
9 during the Bush Administration, and adopted.
10 That was a respectful process to the organic
11 community.

12 Mr. McEvoy, you unilaterally took
13 that authority away without talking to the
14 Board or anyone else. Wrong.

15 And people support the changes,
16 the people you are listening to. Miles,
17 farmers are nice. I'm not that nice. I work
18 for farmers. I'm a hired man. Thousands of
19 farmers, probably the majority of certified
20 organic farmers pay my check to be here today.
21 Please listen to them.

22 It is insulting to suggest that

1 farmers are just concerned with weed control
2 or, as you said yesterday, just aren't paying
3 attention to the list. You're not talking to
4 the same farmers we're talking to.

5 Intimidation. This is a public
6 process. That is the hallmark of this Organic
7 Policy Program that was developed by Congress.
8 The Cornucopia Institute and everyone else who
9 speaks out is subject to a critique and
10 analysis by others of what we are presenting.

11 I can tell you, it is not easy
12 being a corporate and governmental watchdog
13 and taking on powerful people in this
14 industry. But, Miles, I'll remind you of --

15 CHAIR RICHARDSON: Excuse me for
16 interrupting you, Mark.

17 MR. KASTEL: Yes.

18 CHAIR RICHARDSON: My apologies,
19 but your comments actually get addressed to
20 the Chair. So, rather than pointing to an
21 individual person around the table, just
22 address the comments to the Chair.

1 MR. KASTEL: Okay.

2 CHAIR RICHARDSON: Thank you.

3 MR. KASTEL: I hope we'll turn the
4 clock back.

5 Thank you, Madam Chair.

6 Madam Chair, I'll remind you that
7 Harry Truman, when he was President, said, "If
8 you want a friend in Washington, get a dog."
9 This is the democratic, small "d", process at
10 work here. It is a wonderful program. The
11 attributes of organics is based on people
12 caring.

13 So, overwhelming negative response
14 to the power grab by the USDA. The changes to
15 the governance and sunset, here's the response
16 from New York State: we need more listening.
17 So, you contacted all the NGOs. You sit down
18 with us. You schedule a listening session.

19 Is that one minute (referring to
20 signal that time is almost up)?

21 Okay. Can I get my time back?

22 So, the peer review process, we

1 had one in 2011. The Office of Inspector
2 twice critiqued this program very negatively.
3 This new ANSI, American National Standards
4 Institute, I hope everybody will read that.
5 We own the organic label. Is our program
6 doing the best job?

7 Enforcement. You said 400
8 enforcement actions. Only one was willful and
9 worthy of revocation? And where were the
10 names of those companies? We need the
11 enforcement actions to act as a deterrent to
12 help the majority of people that are following
13 the law and acting ethically.

14 I'll wrap up here, Madam Chair.

15 So, we really appreciate you
16 moving these meetings around the country. It
17 gives more farmers access. But we need to do
18 a better job. The problems with a meeting in
19 a demolition zone in San Antonio were
20 horrendous, and there's a 60,000-person
21 convention competing for hotel rooms. I can
22 tell you that there were many organic

1 stakeholders that wanted to attend that either
2 couldn't get a room or the rooms are now \$500.

3 Thank you very much.

4 CHAIR RICHARDSON: Thank you very
5 much, Mark.

6 MR. KASTEL: Thank you.

7 CHAIR RICHARDSON: The next
8 presenter is Jim Pierce. And then, it will be
9 Liana Hoodes.

10 MR. KASTEL: Madam Chair, just in
11 case somebody has a question, which they might
12 not, can you poll the Board for that?

13 CHAIR RICHARDSON: My apologies.
14 Is there a question from the Board for Mark?
15 I apologize.

16 (No response.)

17 MR. KASTEL: Thank you very much.

18 CHAIR RICHARDSON: Thank you.

19 MR. PIERCE: Good morning.

20 Thank you for announcing the next
21 person on deck, too. That helps us get ready.

22 And in my case, I came in at about

1 3:15. So, I am going to say the last sentence
2 very slow, Mac.

3 Good morning.

4 I'm Jim Pierce from Oregon Tilth,
5 the best certifier.

6 We are concerned about the current
7 tone of the dialog within the organic
8 community. "We" is intentionally inclusive:
9 we, the certifiers; we, the producers and
10 handlers; we, the watchdoggers and consumer
11 advocates and the listserv bloggers; we, the
12 NOP staff and NOSB members; we, the crusty old
13 and the starry-eyed new. We are united,
14 championing the same better food system,
15 safeguarding the progress we have made in
16 trying to manage the growth and change of this
17 dynamic organic movement that is growing and
18 changing faster than ever.

19 But with great power comes great
20 responsibility. Peter Parker's Uncle Ben said
21 that to him, but credit the coinage to
22 Voltaire.

1 We must engage others with
2 respect, patience, and the desire to listen
3 and be understood. We need to embrace
4 courageous conversations and avoid
5 isolationism.

6 Unfortunately, our dialog is
7 growing increasingly unkind, taking on the
8 negative tone of political commercials and
9 winner-take-all, yield-no-quarter talk shows.

10 We are concerned the result is a
11 slippery slide into the same gridlock and can-
12 kicking that has pervaded and paralyzed our
13 political system.

14 Friends and colleagues, this isn't
15 politics. This is food. And it's time for
16 course correction.

17 Of particular concern are the
18 overly-negative, mean-spirited comments as
19 well as the steady drumbeat that the NOP is
20 now in the hands of agribusiness corporations.
21 Since its inception, the NOP has been on a
22 trajectory characterized by continuous

1 improvement, increased clarity, and additional
2 rigor.

3 Leaders lead, if necessary,
4 upsetting the status quo in order to manage
5 growth and change. Mr. McEvoy, as a leader,
6 has stuck his neck out and led the program,
7 knowing that some decisions would be met with
8 opposition as well as appeasement. Now I'm
9 going to stick my neck out and say, "Good
10 job."

11 We agree with most, if not every,
12 NOP decision, but we appreciate the leadership
13 and belief protecting organic integrity guides
14 the decisionmaking process. OTCO's position
15 remains as it is. We listen. We participate.
16 We collaborate, and we respect the process and
17 its outcome.

18 I'm not talking about drinking
19 Kool-Aid and singing Kumbaya. We all have
20 problems with the program and the standard and
21 with something on the list. But our criticism
22 must be constructive, not destructive.

1 To you, no hats, no guns, no
2 spitting. Let's use this meeting to begin to
3 rebuild, to unite, and to heal. Reverse the
4 momentum and set the stage for these four fine
5 new recruits.

6 Those of you giving public
7 comment, be respectful and be gracious.
8 Certainly be critical, be opinionated, and be
9 convincing in your ideas. There is mission-
10 critical work to be done, and while we might
11 not always be in agreement on the route, we
12 are on the same road and we cannot afford to
13 have the divisive politics that are
14 constipating Congress to become part of the
15 NOP.

16 We need to leave here on
17 solidarity for the noble cause that brought us
18 together. With great hope and with great
19 responsibility, this week's meeting will
20 reflect plenty of lively discussion, but also
21 a balance of voices, resulting in constructive
22 proceedings.

1 Thank -- no, I'm not going to go
2 there.

3 (Laughter.)

4 Thank you.

5 CHAIR RICHARDSON: Thank you, Jim.

6 Questions for Jim Pierce?

7 (No response.)

8 MR. PIERCE: All right. Thank
9 you.

10 CHAIR RICHARDSON: Thank you very
11 much.

12 The next speaker is Liana Hooded,
13 with Jim Gerritsen on deck.

14 MS. HOODES: Good morning, all.

15 I am Liana Hooded. I'm the
16 Executive Director of the National Organic
17 Coalition, a national alliance of farmers,
18 environmentalists, consumers, and industry
19 members, working for organic integrity.

20 Thanks to the National Organic
21 Program and the NOSB, all of you, and
22 specifically, to Joe, Jay, John, and Wendy for

1 your five-year term. We appreciate it.

2 I want to begin with a comment
3 from NOC's dairy farmers. Thanks for moving
4 the origin of livestock rule. Please actively
5 shepherd it, the regulation, through the
6 agencies and places it needs to go. It has
7 got to happen.

8 I will start with a correction of
9 NOC's written comments. Apparently, I got
10 really confused in our comments. For the
11 materials I-mallic acid and sodium acid
12 pyrophosphate, we used the phrase "allow to
13 sunset". We were clearly advocating that
14 these materials come off the list. Yet, I
15 have been corrected that now "allow to sunset"
16 means allow to stay on the list. Is that
17 true? Under what usage of the word does
18 "sunsetting" a substance mean status quo?
19 It's nonsensical and is clearly not the intent
20 of the framers of OFPA.

21 This speaks to my next issue about
22 organic's added values. Obviously, health and

1 environment are universally accepted. Social
2 justice is not in the U.S. definition, but
3 worldwide is a value.

4 But we are leaving out another
5 significant value, transparency. Transparency
6 is inherent in this U.S. Organic Program. It
7 is what the consumers want. The GMO labeling
8 pitch, we have right to know what's in our
9 food.

10 Organic provides that transparency
11 much more comprehensively than any other
12 label. Prohibits GMOs and toxic pesticide.

13 There are twice-a-year NOSB
14 meetings with public dockets, a website that
15 notes every synthetic and more allowed or
16 being proposed in organic. And there's
17 ongoing notice and comment and rulemaking.

18 Organic is, and should be, awash
19 in public transparency. So, let's stop saying
20 that loud and public criticism is hurting
21 organic. This is a democracy, and we should
22 embrace the publicity. Organic should be that

1 most democratic part of our food supply, and
2 the message should be organic is not about
3 perfection; it is about a transparent path to
4 getting better and better at producing organic
5 food. That is continuous improvement.

6 Are synthetics an exception in
7 organic? Absolutely, but they are
8 specifically allowed to exist in a robust,
9 ongoing review process. Nowhere else in the
10 food supply can we know precisely what is in
11 our food.

12 Yet, increasingly, USDA policies
13 have sought to limit this transparency. For
14 instance, NOC's comments on materials, we
15 often are saying no to these materials, but we
16 are saying no to the incomplete process rather
17 than really objecting to the materials.

18 If the public is going to have
19 extra time in this new process to comment,
20 give us the information. And NOSB's new CBI
21 policy is great, and it needs to apply to all
22 materials.

1 For instance, many basic terms are
2 not clear or defined, such as fermentation,
3 ancillary substances, and microorganisms. Our
4 review of materials is limited for lack of
5 that information.

6 Comprehensive sunset review of
7 hundreds of old materials is necessary. It
8 will be massive work and will set a precedent
9 for the future that no other part of the food
10 supply will be able to duplicate. We, as
11 advocates, must support NOP in finding
12 resources to accomplish it, but the task must
13 happen.

14 NOC is very disappointed that
15 during the tenure of Jay Feldman, a national
16 expert on inerts, who proposed an efficient
17 inerts review process years ago, the
18 Department has not moved forward with review
19 of any inerts during his tenure.

20 Major kudos to NOSB in working on
21 the definition of genetic engineering,
22 refining the excluded methods. This will be

1 difficult, really difficult. Let's embrace
2 the controversy and march organic ahead of GE
3 labeling.

4 You are also leading the way in
5 examining contamination of inputs in organic.
6 Yes, it exists and it will increase.

7 (Signal that time is almost
8 expired.)

9 Okay. Can I just finish that?

10 CHAIR RICHARDSON: Finish the
11 sentence. Go ahead.

12 MS. HOODES: Yes. But, by facing
13 this contamination head-on, we can work to
14 limit it from all sources without tying the
15 hands of farmers. That is the point I really
16 want to make. We can look at the
17 contamination, but not limit what farmers need
18 to do.

19 So, thank you.

20 CHAIR RICHARDSON: Thank you,
21 Liana.

22 Are there questions for Liana from

1 the Board?

2 (No response.)

3 All right.

4 MS. HOODES: And I need my T-shirt
5 or mug.

6 (Laughter.)

7 CHAIR RICHARDSON: Thank you.

8 The next speaker is Jim Gerritsen,
9 and on deck is Darren Abernathy.

10 MR. GERRITSEN: Good morning.

11 I'm Jim Gerritsen.

12 (Signal that time is almost
13 expired.)

14 (Laughter.)

15 Where's my T-shirt?

16 (Laughter.)

17 Okay. I figured I would be a
18 little bit different. We are certified
19 organic farmers. We have been certified
20 organic farmers for 32 years, farming
21 organically for 38, and I wanted to show you
22 our farm in extreme northern Maine.

1 What you are seeing there is we
2 are right on the edge of the north Maine
3 woods. In our six-by-six-mile township there
4 are eight residents. We are in the most
5 sparsely-populated county east of the
6 Mississippi River. There are six of the eight
7 residents in our township, six-by-six-mile
8 township. And they are standing in a field of
9 certified organic Dorinny sweet seed corn.

10 What we make our living from is
11 raising organic seed. It is a family farm.
12 Every person you see up there is working hard
13 doing my work while I am here at this meeting.

14 But the important thing that I
15 want to say about that corn is that the market
16 demand is for freedom from GE content. At our
17 own expense, we get that tested, and this corn
18 crop again has tested free of GE content. And
19 it is that isolation which allows us to grow
20 that corn.

21 But our main crop is growing
22 organic seed potatoes. And we market that

1 through a mail order catalog and web store,
2 and we have customers in all 50 states, both
3 certified organic farmers and organic
4 gardeners that want good seed in their home.

5 But I am here today to speak as
6 the President of the industry trade group
7 Organic Seed Growers and Trade Association.
8 I am one of the founding members of that
9 organization. We have been to NOSB meetings
10 before, providing testimony. We have spoken
11 with your Subcommittees, providing background.

12 We believe in the NOSB, but we are
13 very troubled by recent developments here and
14 by the behavior of the USDA, which we believe
15 is illegitimate. Essentially, the NOSB's
16 primary responsibility is to the organic
17 community, and that responsibility is bounded
18 by the language in the OFPA. And that
19 establishes the overarching goal of protecting
20 the interests of organic consumers and organic
21 farmers. It doesn't mean following the USDA
22 when they are in error or they are

1 misbehaving.

2 And these come down to important
3 aspects like some sunset is sunset. It is in
4 the law. It is clear to everyone in our
5 organization. USDA was in error changing
6 this, and the NOSB has to be independent and
7 stand up to them.

8 We also object to the idea of the
9 USDA stacking the NOSB with members that don't
10 represent the enumerated interests on the
11 Board. It is illegitimate to have non-
12 owner/operator family farmers serving in
13 positions of the four farmer positions. It is
14 illegitimate to pass over the long-time
15 members of the organic community and, instead,
16 place, through appointment, members of
17 corporations where organic sales are only a
18 small percentage of their overall sales.

19 It brings upon a disrespect for
20 the organic label and for those of us making
21 our living from it and those of us who have
22 invested our life in organic. It is something

1 that we will not abide. We will resist it,
2 and that is why we are here testifying that we
3 support the NOSB and their behavior and their
4 activity. And you need courage to stand up
5 for what's right.

6 Thank you.

7 I would be happy to answer any
8 questions that you have.

9 CHAIR RICHARDSON: Thank you, Jim.
10 Questions?

11 Jay?

12 MEMBER FELDMAN: Thanks, Jim.

13 I hope the population drop in your
14 town while you're away doesn't become a
15 problem.

16 But I have a question about
17 genetic engineering because you have done so
18 much work on this topic. You're familiar, of
19 course, with the work that the Board has done
20 in terms of sea purity discussion documents,
21 and now we have a document for discussion on
22 contamination, farm inputs, and managing that.

1 Where do you think this Board
2 should be going to address this broad issue of
3 genetically-engineered contamination?

4 MR. GERRITSEN: Yes, I could talk
5 all day on that, Jay. Thank you for asking
6 the question.

7 I think it is a very complicated
8 issue. I think that the NOSB is the advisor
9 to the USDA NOP. USDA has a responsibility
10 for ensuring the welfare of all American
11 farmers, including organic farmers.

12 They have failed in their mission
13 to not -- for example, on the issue of GMO
14 vaccines, organic does not deal with GMO, but
15 how can we know if the USDA does not require
16 the manufacturers of vaccines to be honest
17 with the public and identify what is GMO?

18 So, the USDA really, I think, has
19 been failing in its obligations. In addition,
20 the USDA has an obligation to protect the
21 private property rights of organic farmers.
22 When it comes to contamination, be it

1 genetically-engineered trespass or be it
2 chemical trespass, we have a right to farm the
3 way we choose on our farms, and USDA needs to
4 stand up and protect us in this right.

5 And this affects the entire
6 organic community, because if we, as organic
7 farmers, are not protected in that right to
8 grow the way that we want, then the idea of
9 organic -- consumers, they basically lost
10 their access to clean organic food.

11 So, to answer your question, I
12 think the NOSB has to require better
13 collaboration somehow with the USDA. The
14 principle that has to be at play is that the
15 polluter pays.

16 You know, that Dorinny seed corn
17 that I sent off for testing, it cost us \$200,
18 and that comes right from our bottom line. It
19 comes right out of our pocket. Yet, we are
20 the innocent victims of potential
21 contamination. Yet, in order to put organic
22 seed into the trade system, we need to verify

1 that we are free of GE contamination. The
2 cost for that testing, the cost of the sample,
3 the cost of the damage when our members get
4 contaminated by GE, that should all be borne
5 by the biotech industry, which is the polluter
6 and which USDA APHIS has allowed, through
7 regulation or deregulation without any
8 limitation -- and that is irresponsible. It
9 does not protect the rights of farmers that
10 don't want anything to do with GMOs.

11 So, I think that NOSB somehow has
12 to get USDA off their chair and get them to
13 actually protect the farmers that they are --

14 MEMBER FELDMAN: Thank you.

15 CHAIR RICHARDSON: Thank you.

16 Zea, and then, Harold.

17 MEMBER SONNABEND: Thanks, Jim.

18 Along the same lines with Jay's
19 question, you heard -- and, undoubtedly, read
20 through our excluded methods terminology
21 discussion document. And we identify some of
22 the challenges of even determining what

1 varieties and what inputs are genetically
2 engineered.

3 While we, of course, would like to
4 prohibit all of this in organics, but how do
5 we prohibit something where we can't identify
6 what it is? And so, I am wondering if you
7 have any insights on how we would be able to
8 say we were to change the policy on cell
9 fusion for Brassica hybrids and how we would
10 be able to find and identify those or the
11 inbred lines that may have been produced with
12 genetic engineering that, then, have gone into
13 both organic and conventional seed hybrids.
14 And I wonder if you have any suggestions on
15 that.

16 MR. GERRITSEN: Well, beyond the
17 four-minute limitation, I did want to express
18 my support for, first off, organic
19 certification system being a process-based
20 system. I think that is sound.

21 Second off, we believe that the
22 chart concept for coming up with the excluded

1 methods to try to differentiate what is an
2 acceptable technology that organic farmers can
3 employ and what is not, that that is heading
4 in the right direction.

5 I think it is going to be
6 difficult, and it is something that is going
7 to have to be updated on a regular basis
8 because nothing is standing still.

9 In terms of something like cell
10 fusion, we were disappointed when USDA
11 unilaterally declared that that was okay. We
12 thought that that violation of due process was
13 inappropriate. It should have been sent out
14 for public comment.

15 But that is one of many. I think
16 there are going to be many coming down the
17 line. But I think, essentially -- and this is
18 something that we are developing within
19 Organic Seed Growers and Trade Association --
20 we have to come up with a definition of what
21 is legitimate organic breeding practices.
22 Once we go from that, then we can identify

1 what practices do not jive with that correct
2 definition. And I think cell fusion, among
3 others, is going to come up as being a
4 practice that is not legitimate within the
5 organic community.

6 Does that speak to your question?

7 MEMBER SONNABEND: Yes, and this
8 is the beginning of the dialog that cell
9 fusion will be included in in the future, this
10 paper. First, we have to get the definition
11 and structure down --

12 MR. GERRITSEN: Yes.

13 MEMBER SONNABEND: -- and then, we
14 will look at the terms.

15 But thank you, and we hope you
16 will continue to give input on this subject.

17 MR. GERRITSEN: Thank you.

18 MEMBER AUSTIN: I'm okay. Jean,
19 I'm okay.

20 CHAIR RICHARDSON: The next
21 speaker is Darren Abernathy, and on deck is
22 Dr. Lisa Bunin.

1 MR. ABERNATHY: Good morning,
2 ladies and gentlemen of the Board.

3 My name is Darren Abernathy. I am
4 the Production Manager for Reiter Brothers in
5 Oxnard, California. We are a grower of all
6 four berry types, blacks, blues, straws, and
7 ras. We do have a large organic program which
8 I am also in charge of.

9 I am here to request that you
10 leave sulfurous acid on the list of approved
11 materials for organic production. Our family-
12 owned company has been farming since 1868, and
13 our main focus is to be good stewards of the
14 ground that we farm. And the use of sulfurous
15 acid has been a great tool for healthy soil.

16 I won't spend a whole lot of time
17 talking about the chemistry. I can leave that
18 for Terry to talk about, but I am sure you
19 guys all know it. It is pretty basic and one
20 that I believe is organic.

21 What I would like to discuss with
22 you are the exciting changes and progress that

1 we have made in our organic program since
2 sulfurous acid was approved. This process and
3 the product has given us the ability to
4 accomplish our goal of reducing pH, so that
5 nutrients are more readily available for
6 uptake by our plants.

7 Another benefit is that it
8 dissolves and leaches harmful salts from our
9 soils that previously roadblocked our plants
10 from producing yields that would maintain a
11 sound business. By reducing these harmful
12 salts, we have reduced our irrigation volumes
13 as well. Since our soils are now opened up,
14 we have actually provided a more uniform
15 wetting pattern and reduced our overall usage
16 per year, which we have actually been
17 applauded for by local water agencies as well
18 as the Groundwater Management Agency in the
19 area.

20 The applied product has a pH of
21 roughly 2.5. So, it is like handling Coca-
22 Cola. So, I mean, in California, you know, we

1 are held to pretty stringent rules other than
2 the NOSB, but it is definitely a better avenue
3 for applying acid in the field versus other
4 options. As a company, we are very happy in
5 the fact that this product is safe.

6 Let's see. One thing that I did
7 want to explain to you was the fact that,
8 since we have been using it, our yields and
9 quality of plants that we have produced have
10 really gone up. The benefits of this is,
11 obviously, increasing yields, but we have
12 actually started spraying less. Why? Well,
13 when we build a stronger plant, we build
14 better cell structure within a plant. So, we
15 don't really have to battle as much with
16 insect, disease, et cetera, and things like
17 that, which I think is really good, too,
18 because it lowers our carbon footprint on the
19 ground. Because, quite honestly, the carbon
20 footprint in organics is very high. We have
21 to send a tractor down the furrows a lot more
22 than we do in a conventional setting.

1 Let's see. So, I'm a little bit
2 nervous that it is going to be taking off the
3 list because prior to this we were actually
4 thinking about eliminating our organic
5 program. And why? Well, it was because we
6 were producing those weak-quality plants. Now
7 we have plants that actually increase our
8 organic program. And if this is removed, I am
9 really concerned that we probably won't do so.

10 Being a big proponent of organic,
11 you know, I think that it is a good thing to
12 produce more organic. I mean, we are a
13 relatively-large company. We farm a lot of
14 conventional acres. We are about 2,000 acres
15 on organic, and the plan is actually to
16 increase that to a little over 5,000 acres.

17 (Signal that time is almost
18 expired.)

19 Can I have one more second?

20 So, please, please continue to
21 protect the organic integrity. I mean, I
22 believe in it. Obviously, everybody in this

1 room and you guys believe in it. This is
2 something that is really simple and I really
3 don't know why it is being challenged.

4 CHAIR RICHARDSON: Thank you,
5 Darren.

6 Questions?

7 Jay?

8 MEMBER FELDMAN: Thank you. That
9 was very helpful testimony. I appreciate you
10 making the trip here.

11 I just have a question about the
12 process from your perspective, having read
13 what is on the agenda of this meeting. What
14 is your impression of what the Subcommittee
15 intended to do with sulfurous acid?

16 MR. ABERNATHY: My impression of
17 what was going to happen was that it was
18 what -- I have heard everybody talking about
19 sunset. My impression was that it was going
20 to be going away.

21 MEMBER FELDMAN: Okay. Thank you.

22 CHAIR RICHARDSON: Harold?

1 MEMBER AUSTIN: Thank you for
2 coming and presenting your testimony for us.

3 I think one of the things that we
4 look at is, when we put something on the
5 National List for use, that there benefits
6 that are allowed. You talked about reduction
7 of water --

8 MR. ABERNATHY: Uh-hum.

9 MEMBER AUSTIN: -- increased plant
10 health, increased soil health, availability to
11 the nutrients. If you did not have the
12 ability to use the sulfur burner and create
13 sulfuric acid on the farm, what other
14 alternatives would there be, or would you
15 simply go back to conventional farming?

16 MR. ABERNATHY: The other
17 alternative that exists is citric acid. The
18 problem with citric acid is, again, it is a
19 weaker acid, but it comes from unreliable
20 sources.

21 You know, we analyze everything
22 that we do, everything that we put on the

1 field. Everything that we get sent to by
2 vendors, we run it through the whole process.
3 I'm not a chemist, but I pass it by chemists
4 that are in our company.

5 The problem with sulfurous acid
6 (sic) is exactly that. I mean, it is
7 unreliable. It is weak. And, yes, we
8 probably would not increase if we were going
9 to go that route, let alone it is very
10 expensive. It is about \$2 a pound. Citric.

11 CHAIR RICHARDSON: Calvin?

12 MEMBER WALKER: Thank you for
13 coming. I enjoyed your testimony.

14 I apologize for not listening at
15 the beginning, a senior moment.

16 Could you share with us the type
17 of crops that you use the sulfuric acid in?
18 Is it blueberries?

19 MR. ABERNATHY: We use sulfuric
20 acid on all four crops; basically, on
21 straws -- sorry -- strawberries, we call them
22 "straws", but straws, blacks, blues, ras. But

1 strawberries, raspberries, blackberries, we
2 are trying to get down to a 6.5 pH. On blues
3 or blueberries, we are trying to get down to
4 a 5.5.

5 Now why are we trying to get into
6 those different ranges? Because that is the
7 natural, basically, soil habitat of the plant.
8 For example, a blueberry, it is an understory
9 plant that comes from rainy climates. So, for
10 example, in Oregon, we farm in Oregon as well.
11 The pH of the soils in Oregon are 5.6, 5.7.
12 Going back to what Terry is talking about, the
13 pH of natural rainwater is 5.6. What we are
14 doing inside this burner is the same. I mean,
15 it is the same as rain.

16 So, by farming these crops at the
17 right pH, we are able to get the right
18 elements into the plant and get the right cell
19 structure to build a strong plant.

20 CHAIR RICHARDSON: Any other
21 questions?

22 (No response.)

1 Thank you very much.

2 MR. ABERNATHY: Thank you.

3 CHAIR RICHARDSON: The next
4 speaker is Dr. Lisa Bunin, followed by Jake
5 Lewin.

6 DR. BUNIN: Good morning.

7 My name is Lisa Bunin. I am the
8 Organic Policy Director at the Center for Food
9 Safety, a public interest organization with a
10 membership base of a half-a-million people
11 nationwide.

12 My remarks address ocean-based
13 fish farming, compost, gellan gum, and whole
14 algal flour.

15 Last week, the Center for Food
16 Safety released its report "Like Oil and
17 Water: Ocean-Based Fish Farms and Organic
18 Don't Mix". The report provides scientific
19 evidence to explain why fish farmed at sea can
20 never be certified organic.

21 Even though the NOSB has discussed
22 aquaculture for more than a decade, neither

1 the Aquaculture Animal Task Force nor the
2 Aquaculture Working Group has satisfactorily
3 resolved four thorny issues.

4 One, how can harm to wild fish and
5 marine ecosystems from the spread of
6 parasites, pathogens, and diseases carried by
7 farmed fish be prevented? Our investigative
8 report documents 24 million reported escapes
9 in two decades, demonstrating that escapes are
10 unavoidable. This represents a tip of the
11 iceberg, since governments not only allow
12 self-reporting, but they also allow a certain
13 number of escapes to go unreported.

14 Second, how can organic
15 regulations permit the farming of migratory
16 fish such as the economically-coveted Atlantic
17 and Pacific salmon? Caging them would
18 severely constrain their natural and
19 instinctual behavior of swimming long
20 distances between fresh and salt waters. This
21 goes against organic's animal welfare and
22 stewardship requirements.

1 Third, how can fish farms at sea
2 contain, monitor, and control inputs and
3 outputs when seawater regularly flows in and
4 out of the facility? How can those unknown
5 inputs and outputs, some of which are
6 synthetics prohibited under OFPA, be
7 accurately documented in an organic system
8 plan?

9 And finally, how can feed
10 consisting of wild-caught fish or their
11 byproducts be considered part of an organic
12 practice, when all other organic animals are
13 required to be feed a 100-percent organic
14 diet?

15 When the Aquatic Animal Task Force
16 warned in 2001 that some of these issues may
17 not be resolvable and that they contravene
18 OFPA, the aquaculture industry successfully
19 lobbied to halt the development of
20 regulations. They warned that to do otherwise
21 would cast serious doubt on the potential of
22 some major species, most notably salmon, to be

1 certified organic.

2 The assumption seemed to be that,
3 if regulations were to be delayed, tough
4 questions about the viability of organic
5 aquaculture would somehow vanish. And in a
6 way, they did. Four years later in 2005, the
7 AWG released a report with the thorny issues
8 mentioned, but their importance minimized in
9 the recommendations it made to the NOP for
10 organic standards development.

11 CFS has reviewed documents
12 produced by the NOSB and its Work Groups.
13 Nowhere have we seen either group
14 scientifically evaluate the impacts of ocean-
15 based aquaculture against the principles and
16 standards of organic production.

17 These groups have also failed to
18 objectively assess the technological
19 feasibility of resolving outstanding problems
20 known to be associated with ocean-based fish
21 farming.

22 CFS's report demonstrates the

1 impossibility of rectifying them in a way that
2 would allow ocean-based fish farms to qualify
3 as certified organic. Farming fish at sea can
4 never meet the high bar of integrity that is
5 integral to all organic systems of production.

6 CFS urges the NOP and the NOSB to
7 advise the Secretary of Agriculture to
8 withdraw plans to allow ocean-based fish
9 farming in organic aquaculture regulations now
10 in development.

11 Moving on to compost, compost is
12 vital to the success of organic farming, but
13 contamination with prohibited substances is a
14 problem that we all know exists and must be
15 addressed head-on. It is essential to assess
16 the root causes, beginning with the
17 identification and elimination of high-risk
18 sources of feedstock contamination. Solutions
19 must not overburden farmers or leave them
20 without inputs for their compost. We urge the
21 NOSB to keep the conversation going and keep
22 it transparent.

1 With respect to gellan gum and
2 whole algal flour, it is CFS's position that
3 no substance should be considered for
4 relisting, or listing, if the confidential
5 business information in the original petition
6 is not revealed at sunset.

7 Thank you.

8 CHAIR RICHARDSON: Thank you.

9 Are there questions for Lisa?

10 Colehour?

11 MEMBER BONDERA: Thank you, and
12 thank you, Lisa, for your presentation. And
13 thank you for passing this document around.

14 And what is occurring to me, when
15 I glance through it briefly and I look at the
16 references, is the fact that in my
17 conversations over the past several years
18 related to aquaculture within the NOSB, it is
19 unclear to me what research or science, when
20 I ask about it or talk about it, exists.

21 And I am wondering -- I can see
22 some references here, but I just wonder, are

1 there other studies like this? I just don't
2 know where we could be going or looking for
3 more information besides this, which I think
4 looks great, but if you can --

5 DR. BUNIN: Yes. As you can see,
6 we have drawn from quite a wide range of
7 references. I do have one study that I think
8 is one of the best studies out there. And it
9 is by Stephanie Yu-Codke. She looks at. And
10 I think I would highly recommend that the
11 Board take a look at this; also, the NOSB.

12 I am happy, also, to provide any
13 original references, if that is what you would
14 like. I could put together a list with some
15 links, and I would be happy to share it with
16 the Board.

17 Thanks for that.

18 CHAIR RICHARDSON: Jay, did you
19 have a question?

20 MEMBER FELDMAN: No.

21 CHAIR RICHARDSON: Okay. Other
22 questions for Lisa?

1 (No response.)

2 Okay, thank you.

3 DR. BUNIN: Thanks.

4 CHAIR RICHARDSON: The next
5 speaker is Jake Lewin, followed by Jo Ann
6 Baumgartner.

7 MR. LEWIN: Hi, everybody.

8 My name is Jake Lewin. I'm the
9 President of CCOF Certification Services, LLC.
10 We are the nonprofit certification arm of CCOF
11 and the largest certifier under the NOP.

12 Jim Pierce's sentiments really
13 resonated with me, maybe not the best
14 certifier business, but certainly the rest of
15 it.

16 (Laughter.)

17 We certify about 3,000 operations
18 in 43 states and three countries, including
19 about 2,000 farms and 1,000 processors. In
20 2014, we will perform about 4,000 inspections
21 with 64 inspectors. And within our ranks, of
22 course, we have large and small operations,

1 including about 1400 small farms.

2 So, I am really here to applaud
3 the NOSB's consideration of soil conservation
4 issues. These issues speak to why myself and
5 many of us are really here at the most
6 fundamental level.

7 But, as a certifier, these are
8 nuanced and complicated issues to address,
9 particularly in a broad inspection context
10 that includes all other aspects of organic
11 standards, recordkeeping, and more. I can
12 tell you that CCOF takes these issues
13 seriously and encourages our inspectors to
14 observe them.

15 CCOF can, has, and will issue non-
16 compliance when natural resources are not
17 maintained or improved. Most commonly, this
18 is really identified around erosion issues.
19 They are the most easy to see, particularly
20 when a highly-qualified inspector is present
21 at the right time of year. It is not uncommon
22 for us to require the operation to work with

1 NRCS or RCD.

2 However, we would prefer to do a
3 better job in a more collaborative environment
4 with farmers. So, in addition to addressing
5 natural resources in the annual inspection
6 context, we encourage NOSB, when they bring
7 this back, if, to recommend that certifiers be
8 authorized to perform inspections primarily
9 focused on natural resources and soil
10 conservation, say, every four years. These
11 could include soil, biodiversity soil tests,
12 and issues of concern that are best managed in
13 long cycles on a farm. Don't worry; we would
14 still do our full regular inspections.

15 But we believe that covering all
16 aspects of compliance at every inspection
17 reaches a level of diminishing returns,
18 particularly when better outcomes and more
19 thorough observations are recommended by NOP
20 and NOSB on an ongoing basis.

21 So, this would allow us to use our
22 best inspectors and deliver better results

1 over time. So, we are just basically looking
2 for a new model to do better work.

3 With regard to the contamination
4 issues document, we have addressed it in our
5 comments and generally think our efforts are
6 best placed on changing policies in
7 agriculture generally and not placing
8 burdensome limits on organic farmers based on
9 theoretical issues.

10 We ask you to not hold them
11 accountable for external forces that are
12 demonstrating every day that they are the
13 alternative to. The majority of these are
14 generally beyond the responsibilities of
15 organic farmers to address. So, instead,
16 let's focus on the practices organic farmers
17 use and their contribution to the earth and
18 agriculture.

19 Regarding materials issues, we
20 provided a number of comments, primarily
21 demonstrating where in CCOF we know operators
22 are affected or use materials, or whatnot.

1 And these are people's lives. As certifier,
2 we know more than most what that means, and we
3 ask you to take it into account in your
4 Committee deliberations, hear each other out,
5 vote your conscience, and let the process and
6 standards move forward. Please don't mire the
7 process in procedural gamesmanship.

8 And I'm happy to take questions.

9 CHAIR RICHARDSON: Thank you.

10 Questions?

11 Harold?

12 MEMBER AUSTIN: Do you know if you
13 certify anybody that is using tragacanth gum?

14 MR. LEWIN: We would have
15 addressed that in our comments, and Zea is
16 telling me no.

17 (Laughter.)

18 MEMBER AUSTIN: Okay. Thank you.
19 Thank you, Zea, for the assist.

20 CHAIR RICHARDSON: Any other
21 questions for Jake?

22 MEMBER FELDMAN: Hi, Jake. Thanks

1 for your comments.

2 On the contamination issue --

3 MR. LEWIN: Yes?

4 MEMBER FELDMAN: -- similar to the
5 GMO issue and sea purity issue, it wasn't my
6 impression -- and this is something I want to
7 verify with you -- that the document even
8 implied that it was headed in the direction of
9 holding growers accountable for contamination.

10 The question really was -- and
11 this is where I would like to get your input
12 -- do you think it is an important
13 conversation in the organic community as a
14 means of finding a solution that is not
15 burdensome to farmers and that does not have
16 fallout in the marketplace to have this
17 discussion on potential contamination to farm
18 inputs, with the hope that we might, as a
19 community, come together and figure out a way
20 to prevent it or control it better on behalf
21 of farmers and those reliant on the inputs?

22 MR. LEWIN: Fundamentally, well,

1 for one thing, the contamination issues
2 document, conversations are fine to have; I
3 think it is a dangerous territory to quote
4 bloggers as a source for conversation.

5 After that, a lot of what was in
6 that particular document was just overly
7 broad.

8 MEMBER FELDMAN: So, a more
9 focused discussion, though, with experts that
10 can help pinpoint real issues of concern, is
11 that valid ground from a certifier's
12 perspective?

13 MR. LEWIN: I think organic
14 farmers contribute more in what they do and
15 how they do it, and that getting overly
16 reductionist or analytical with regards to
17 testing leads to diminishing returns and isn't
18 really in the big picture.

19 CHAIR RICHARDSON: Thank you.

20 Additional comments?

21 (No response.)

22 Thank you, Jake.

1 MR. LEWIN: Sure. Thank you very
2 much.

3 CHAIR RICHARDSON: The next
4 speaker is Jo Ann Baumgartner, and that will
5 be followed by Mark LeJeune.

6 MS. BAUMGARTNER: Hello. I'm Jo
7 Ann Baumgartner with the Wild Farm Alliance.
8 We promote a healthy, viable agriculture that
9 helps protect and restore wild nature.

10 As a reminder, the NOP Natural
11 Resource Standard requires that operators
12 maintain soil, water, wetlands, woodlands, and
13 wildlife. Organic production definition
14 includes conserving biodiversity. The
15 preamble says that the word "conserve" means
16 the producer must initiate practices to
17 support biodiversity and compliance is
18 required.

19 Thanks to the NOSB for addressing
20 soil conservation compliance. Highly-erodible
21 land is a serious issue.

22 We recommend that the NOP require

1 some information generated by NRCS be used in
2 the inspection process, but only when the
3 producer is involved. So that any limitations
4 to NRCS in understanding holistic systems will
5 be fairly addressed.

6 Therefore, we recommend yes for
7 Question 10, that the producer should be
8 required to communicate conservation
9 information to the certifier, but not just
10 from NRCS, also from other kinds of
11 conservation organizations.

12 ATL is actually one of many
13 critical conservation issues that needs to be
14 addressed. Others include farm bill provision
15 swampbuster and sodsaver and high-value
16 conservation lands. These are natural
17 habitats that have been identified as having
18 outstanding importance due to their
19 environmental biodiversity and landscape
20 values.

21 The NOP three-year waiting rule
22 for land with pesticides incentivizes farmers

1 to convert pesticide-free high-value
2 conservation areas to organic production
3 because they can do it quickly. This has to
4 change for high-value conservation lands and
5 come into alignment with sodsaver and with
6 swampbuster farm bill provisions.

7 In 2012 alone, nearly 400,000
8 acres of grasslands and other newly-broken
9 lands were converted to cropland nationally.
10 Some part of these acres were obviously
11 organic.

12 This past winter we surveyed and
13 interviewed over 50 certification personnel,
14 with the help of IOIA and others, and it was
15 reported that only 55 percent integrate
16 conservation in organic in a meaningful way,
17 addressing all of these issues. Many might
18 know one subject, for instance, soil
19 conservation, but not another. Like they
20 wouldn't know what wetlands were.

21 NOP regulations require
22 certification personnel have experience,

1 training, and education in that which they
2 inspect or review, including conservation. We
3 request that the CACS work on a recommendation
4 for rigorous development of conservation
5 education, training, and experience for
6 certification personnel in a way that ensures
7 credibility.

8 The CACS could help determine what
9 baseline conservation knowledge is required
10 and determine how Continuing Education Units
11 for organic certification personnel would
12 ensure continual improvement.

13 The NOP's review audit, published
14 this summer, that is used when accrediting
15 certifiers, has a critical issue missing. We
16 request that biodiversity and natural resource
17 standard 205.200 be added.

18 And finally, I want to give you an
19 update to FDA's re-proposed produce rule.
20 They are now not requiring fencing or
21 destroying animal habitat or otherwise
22 clearing farm borders. So, that is good for

1 organic because we rely on and are required to
2 conserve biological diversity.

3 Thanks.

4 Any questions?

5 CHAIR RICHARDSON: Thank you, Jo
6 Ann.

7 Questions for Jo Ann?

8 (No response.)

9 No? Okay. Thank you very much.

10 The next speaker is Mark LeJeune,
11 and with Ib Hagston on deck.

12 MR. LeJEUNE: Hi. My name is Mark
13 LeJeune. I have participated in some capacity
14 as a registrant of NOP-compliant crop inputs
15 for the past 11 years. I have watched the
16 program evolve in many ways, some good, some
17 bad. Most of my concerns with the program
18 from the perspective of a crop input
19 manufacturer have revolved around the fair and
20 applied treatment of fertilizer products that
21 contain ingredients that the program has
22 determined are synthetic. Phos acid, sulphur

1 dioxide, and potassium hydroxide are the three
2 most prominent of these synthetic ingredients
3 due to the widespread use of the fertilizer
4 products that contain them.

5 I work for a company that is
6 commercializing a technology and product that
7 converts supermarket food waste into a
8 pasteurized liquid fertilizer and feed using
9 an enzyme process. We have interest and
10 demand in an organic version of this product.

11 I am here today because I am
12 unable to register our product utilizing the
13 full complement of industry enzymes available
14 to us to make a high-quality input for organic
15 agriculture. These enzymes are approved for
16 use in organic food production. This means
17 they utilize non-GMO production organisms and
18 contain generally-recognized as safe food
19 preservatives to preserve their functionality.

20 These are the same preservatives
21 that the NOP recognized are necessary to be
22 present in enzymes in the original

1 determination for allowance for food
2 production. These enzymes and preservatives
3 are what the NOP is allowing manufacturers to
4 put in food products, which, in turn, are
5 ingested by consumers who buy these products
6 under the USDA Organic Marketing Program.

7 For reasons that, respectfully,
8 defy logic, these same enzymes and
9 preservatives are not allowed to be present,
10 utilized as processing aids in varying
11 concentrations from parts per billion to 40
12 parts per million in the final product
13 formulation in order to manufacture a
14 sustainable fertilizer derived from food
15 waste, a problem that desperately needs
16 solutions and a product that addresses an
17 industry in need of more fertilizer tools for
18 its growers.

19 As a small company, we are faced
20 with the prospect of the lengthy process of
21 petitioning the NOP to approve its use as a
22 processing aid for our crop input. We have

1 consulted with the NOP and have been advised
2 that materials that are approved for organic
3 food production, of course, cannot be
4 considered approved for crop inputs by
5 reviewers outside of the normal process of
6 determining synthetic substances, which is
7 flawed in our view.

8 Also in our view, it would save
9 enormous amounts of time and energy if the
10 program would simply allow substances approved
11 for consumption as organic to be allowable to
12 be put into products that are utilized in the
13 ground.

14 Thank you all. So, I'm good.

15 CHAIR RICHARDSON: Thank you,
16 Mark.

17 Questions?

18 Zea? Sorry.

19 MEMBER SONNABEND: Thank you.

20 It is a little bit less of a
21 question than a comment. Your last sentence,
22 you said, if we would just simply allow

1 substances that can be used in food to be used
2 in crop inputs, but that is not simple at all.
3 That involves changing the federal rule as we
4 have it. And I suggest to you that you
5 turning in a petition for these products is
6 far more simple than us trying to change the
7 rule.

8 (Laughter.)

9 MR. LeJEUNE: Okay.

10 MEMBER SONNABEND: Thank you.

11 CHAIR RICHARDSON: That was wise
12 advice.

13 (Laughter.)

14 Any other comments or questions?

15 (No response.)

16 Thank you very much.

17 MR. LeJEUNE: Duly noted. Thank
18 you.

19 CHAIR RICHARDSON: The next
20 speaker is Ib Hagston, and on deck is Brad
21 Russell.

22 DR. HAGSTON: Good afternoon,

1 Madam Chair and Distinguished Members.

2 I am Dr. Ig Hagston, and I speak
3 on behalf of the Independent Organic
4 Inspectors Association.

5 The NOSB Committee is to be
6 complimented for the initiative to address
7 soil conservation practices that can improve
8 soil and water quality.

9 As organic inspectors, we are used
10 to assess production practices and to ensure
11 that NOP requires continual improvements take
12 place.

13 I am addressing the 10 Committee
14 questions from the perspective of a TSP who
15 has conducted more than 50 conservation plans
16 and completed more than 2500 organic
17 inspections.

18 Let me start with an illustrative
19 story as a TSP conservation planner to NRCS.
20 Yes, RUSLE2, the standard requirement by
21 funding by NRCS could be helpful since the
22 agency cannot pay the producer on farm

1 improvements unless their total annual soil
2 loss per acre, or the T-value, is below five.
3 It is, however, a common misconception among
4 NRCS conservation agents that they upfront
5 believe that the T-value will exceed 20 tons
6 because the farmer wants to use a crop
7 rotation of, for example, corn, soybeans, and
8 wheat with plowing and many crop cultivations.

9 Results from my successfully-
10 completed CAP138 plan, where the producer used
11 a cover crop between each crop rotation, added
12 significant organic matter to plow down
13 residues while reducing soil, wind, and water
14 erosion. The RUSLE2 analysis revealed a T
15 equal 2.6 for the three-year rotation. Yes,
16 cover crops required by the NOP do work.

17 Next week I am presenting a talk
18 at the American Society of Agronomy's Annual
19 Meeting entitled, "Practical Economic Measures
20 for Assessing Organic Farm Conservation".

21 The availability of most soil
22 health measurements on organic farms will be

1 minimal, and the interpretation of the data
2 not well-understood by most inspectors or
3 reviewers. Thus, allow me to make three key
4 observations.

5 One, when there are measured soil
6 performance data available, we, as inspectors
7 and certifiers, should utilize them to the
8 best of our ability.

9 Two, let me caution about building
10 a set of expectations around RUSLE2, as only
11 a very small percentage of organic farms will
12 have that data available.

13 Let me encourage certifiers to ask
14 for soil test results and maps with HEL,
15 Highly-Erodible Land indications, so we
16 inspectors can (a) assess the percent organic
17 matter; (b) monitor soil improvement over
18 time, and (c) become aware of errors where
19 special soil loss or erosion potentials are
20 present.

21 Allow me, while I am at the
22 podium, to make a comment about another issue

1 of the day, namely, use of NOP-approved
2 sulfuric acid as a plant and soil amendment.
3 The minute amounts of sulfuric acid added via
4 in-row foliar fertilization to improve plant
5 health and to buffer the pH is greatly
6 beneficial, one, to make unproductive soils
7 productive and, two, to save tons of soil
8 sulfur per acre, and, three, to benefit the
9 environment. So, please consider a common-
10 sense approach to 205.601(j)(2), sulfuric
11 acid, when you deliberate later this week.

12 Again, congratulations on the
13 effort to pursue greater soil improvement and
14 monitoring on organic farms, and thank you for
15 the opportunity to address this prestigious
16 audience. Thank you.

17 CHAIR RICHARDSON: Thank you, Dr.
18 Hagston.

19 Questions?

20 (No response.)

21 Thank you.

22 DR. HAGSTON: Thank you.

1 CHAIR RICHARDSON: The next
2 speaker is Brad Russell, and the final speaker
3 before lunch will be Laura Batcha.

4 MR. RUSSELL: Hello. My name is
5 Brad Russell. I am a local Louisvillian. I'm
6 a local musician, stone mason, and I work on
7 a horse farm here in Louisville.

8 I am a member of the Cornucopia
9 Institute, and I am here today to testify as
10 a citizen lobbyist. I have volunteered to
11 help present testimony because I want to
12 ensure the integrity of organic food and the
13 practices and principles thereof.

14 It is very important to me because
15 I have noticed in my lifestyle how much my
16 health has improved just in general from going
17 organic.

18 I would like to comment on the
19 2016 sunset of hydrogen chloride as an allowed
20 synthetic on the National List. Hydrogen
21 chloride is used for the removal of lint from
22 cottonseed to facilitate mechanical planting.

1 The Cornucopia Institute strongly
2 recommends that a new Technical Review be
3 completed before hydrogen chloride can be
4 considered for relisting. The most recent TR,
5 Technical Review, from 2013 does not discuss
6 current research in mechanical de-linting and
7 the possibility of the use of safer, less-
8 corrosive acids.

9 The 2013 Technical Review does not
10 discuss the latest research by USDA researcher
11 Greg Holt, who is currently in the final
12 stages of developing a mechanical de-linter.
13 In 2012, Dr. Holt patented a rotating drum
14 concept for mechanical de-linting. His team
15 now has produced a large prototype capable of
16 de-linting up to 150 pounds of cottonseed per
17 hour. A new TR needs to address what it would
18 take to bring mechanical de-linting from these
19 final research stages into commercial
20 production.

21 There are also de-linting machines
22 currently on market with the L.T. Lincer

1 Company that do not use hydrogen chloride.
2 These machines use what is referred to as saw
3 mechanical de-linting, and they also have de-
4 linters that use diluted sulfuric acid. If
5 these safer alternatives are not viable, we
6 need to know why.

7 There may not ever be an economic
8 incentive for those alternatives to be used by
9 the seed companies unless we remove hydrogen
10 chloride from the list. After speaking with
11 Kelly Pepper of the Texas Organic Cotton
12 Marketing Cooperative, Cornucopia staff
13 understands that all currently commercially-
14 available organic cottonseed in the U.S. is
15 de-linted by All-Tex Seed Company in
16 Levelland, Texas. And All-Tex Seed Company
17 uses hydrogen chloride in their de-linting
18 process.

19 It is possible that we are looking
20 at a scenario where delisting hydrogen
21 chloride might be the financial incentive that
22 is needed to bring the mechanical de-linting

1 process to the marketplace. If the mechanical
2 de-linting alternatives are not satisfactory
3 techniques for cottonseed de-linting, then
4 more extensive documentation of the
5 inadequacies of this alternative must be
6 documented.

7 Without a new TR, it is difficult
8 to make this determination. How any of us
9 properly evaluate these substances without
10 that critical information, I don't know.

11 But thank you for allowing me to
12 be here and to present my testimony. If you
13 have any questions about this, please speak
14 with one of the Cornucopia staff members
15 today.

16 Thank you again.

17 CHAIR RICHARDSON: Thank you,
18 Brad.

19 Laura Batcha.

20 MS. BATCHA: Hi, and hopefully,
21 I'll get you all right off to lunch.

22 I'm Laura Batcha, and I am the

1 Executive Director of the Organic Trade
2 Association. OTA represents over 6500
3 businesses, and half of those are small
4 businesses reporting less than a million
5 dollars in organic sales per year.

6 OTA members represent the
7 diversity and the full value chain of organic,
8 including farmers, shippers, processors,
9 certifiers, farmer associations, distributors,
10 importers, exporters, retailers, and others.
11 OTA membership has a legal definition within
12 our bylaws. It is not simply a list or
13 supporters. Trade members each receive one
14 vote in our Board of Directors elections, and
15 OTA members are represented either through
16 direct membership in the Association or
17 through strategic partnerships with regional
18 organic producer organizations.

19 The organic standards are rooted
20 in the use of cultural, biological practices
21 to combat pests, weeds, diseases, and to
22 prevent contamination of organic products. It

1 is critical that NOSB take the lead on
2 refining the practice standards, and we
3 welcome the work on assessing soil
4 conservation and contamination of inputs.

5 NOSB's other critical role is the
6 gatekeeper of the National List. Organic
7 farmers and processors aim to bring their
8 products to market using preventative
9 practices and with a federally-mandated
10 preference for organic ingredients.

11 The list of tools for producers
12 contained on the National List represents the
13 best and least-toxic technology our food
14 system has developed. And these tools must
15 receive regular scrutiny by NOSB and the
16 sector at large to assure they will meet
17 organic expectations.

18 Striking the balance between
19 bolstering the practice standards and
20 judicious evaluation of each tool's continued
21 acceptance in organic production is NOSB's
22 challenge moving forward.

1 The organic sector is a good
2 steward of the National List, and farmers,
3 handlers, ingredient suppliers, and food-
4 makers continue to innovate by developing
5 alternatives to synthetics on the National
6 List.

7 OTA strongly supports its move
8 towards organic alternatives wherever possible
9 and also defends the judicious use of
10 synthetic tools, where necessary to keep
11 organic growing and viable.

12 In addition to the sunset review
13 of materials on the National List, the
14 petition process is open at anytime. And OTA,
15 on behalf of its membership, is filing two
16 petitions with USDA this week.

17 The first petition seeks the
18 removal of lignin sulfanate as a floatation
19 agent in post-harvest handling for the
20 National List as a synthetic substance allowed
21 in crop production under 205.601. Based on
22 polling of packing facilities, it appears the

1 material is no longer essential and can be
2 removed from the list.

3 The second petition is to annotate
4 the listing for natural flavors under 205.605.
5 Natural flavors are a broad category that has
6 been included on the list since it was first
7 implemented in 2002. Over the past decade,
8 many organic flavors have been developed that
9 are being successfully used by companies.
10 However, the regulations as written do not
11 require the use of organic flavors. We are
12 petitioning to revise the current listing to
13 require the use of organic flavors whenever
14 commercially available.

15 I would also like to note that we
16 support the work of the Materials Subcommittee
17 on GMOs. Keep moving forward. Don't forget
18 about seed purity.

19 You have received our full set of
20 comments. And just in closing, I want to
21 remind us all that organic farmers and
22 handlers lose if there are procedural delays

1 that halt the responsible sunset review of
2 materials, and we support the plan of the
3 Chair Jean Richardson to move all motions
4 forward to a full Board vote.

5 So, have a productive meeting, and
6 thank you for your volunteer service.

7 CHAIR RICHARDSON: Thank you,
8 Laura.

9 Questions?

10 Zea?

11 MEMBER SONNABEND: Thank you,
12 Laura.

13 We know OTA has written
14 extensively on prevention strategies being an
15 important component, and that is scheduled for
16 us to be working on next, along with the
17 further work on excluded methods.

18 Could you just give us a little
19 bit of input on that?

20 MS. BATCHA: Sure. We definitely
21 support that work and look forward to that
22 eventually turning into a recommendation for

1 guidance, Zea.

2 I think one of the things that we
3 keep coming back to as a prevention strategy,
4 at least on the crop production side for
5 organic, is the importance of clean seed for
6 farmers to start with. And I know this has
7 been a real challenging topic for us to tackle
8 as a community because of the right and
9 strongly-felt belief that the organic farmers
10 shouldn't bear the burden of the cost of the
11 testing and the contamination from the
12 conventional agriculture system.

13 That said, we also know, and we
14 have seen some recent data from trade that
15 suggests, without clean seed, the farmers are
16 going to continue to be challenged and for it
17 to be almost impossible to produce final crops
18 that, while the threshold is not in organic
19 standards, the market acceptance of that .9
20 percent.

21 So, one of the ideas that we are
22 interested in you all exploring -- and it is

1 not, honestly, a fully-baked solution; it is
2 going to require a lot of experts weighing-in
3 -- but the idea that perhaps we could take the
4 first step by requiring a seed purity
5 declaration on conventional seed that is grown
6 under the commercial-availability clause on
7 organic farms. So that that burden for clean
8 seed come tested and disclosed on the seed
9 bag, but the responsibility for that be with
10 the seed providers that are producing this
11 conventional seed, not on the organic farmers
12 themselves, just as a place to start.

13 Because, you know, we do feel
14 strongly we have to start somewhere with this
15 because the problem is not going to go away,
16 and folks are feeling a lot of pressure out
17 there. We are hoping it might be a creative
18 way to think about building a system that
19 doesn't put the burden on the organic farmers
20 and seed growers.

21 CHAIR RICHARDSON: Thank you,
22 Laura.

1 John?

2 VICE CHAIR FOSTER: Thanks.

3 As usual, I appreciate comments.

4 So, I was looking at our agenda
5 and looking at the packaged comments you had
6 put together. You usually have really lengthy
7 comment on everything on the agenda, and there
8 is not everything in here. So, I am wondering
9 why you didn't do that this time.

10 MS. BATCHA: Okay. Thanks. Yes.

11 So, tomorrow you are going to hear
12 from Gwendolyn, and she is going to talk about
13 the glycerin petition, gellan gum, and boiler
14 chemicals, and just in short, supporting the
15 move to organic and glycerin with a little bit
16 of nuance, keeping gellan gum on the list, and
17 our early first round of assessment on boiler
18 chemicals, that it is maybe time for them to
19 go.

20 Nate is going to address assessing
21 the soil conservation and contamination of
22 inputs as well as sulfurous acid and hydrogen

1 chloride on that next round.

2 I think we reach out to our
3 membership through surveys, and we use members
4 that are also organizations to reach out to
5 their constituents as well. And this two-step
6 review has allowed a little bit more time to
7 provide input.

8 But we are really trying to focus
9 our efforts on sort of two places: where our
10 membership has identified there are
11 alternatives and it is time for the material
12 to move off the list or in areas where it is
13 critical for organic production or handling,
14 and there aren't alternatives and the material
15 needs to stay on the list.

16 So, for a lot of the materials
17 under sunset review or even under petition, if
18 we haven't commented, it is because our
19 membership really has not expressed a stake in
20 the game on those materials or an interest.

21 And I will quote Jean. We are
22 trying to choose our battles wisely.

1 CHAIR RICHARDSON: Thank you.

2 Nick?

3 MEMBER MARAVELL: Laura, getting
4 back to seed purity for a second --

5 MS. BATCHA: Uh-hum.

6 MEMBER MARAVELL: -- I know, and I
7 assume you still are serving on the AC 21
8 Committee? Do you see anything on the horizon
9 through the work of that Committee, because I
10 know it is sort of reinvigorating itself right
11 now, that will provide tangible support or
12 assistance to organic farmers trying to
13 maintain a purer seed supply?

14 MS. BATCHA: Thanks for the
15 question, Nick, and I wish I had some more
16 concrete information. And if Patsy is still
17 in the room, and she has anything to add,
18 please do, because I am not sure I have full
19 visibility.

20 What has been shared with me is
21 that the Committee has been rechartered. We
22 have yet to meet again, and we have not been

1 informed what the Secretary's intention for
2 the reconvening will be.

3 As I understand it, because of the
4 open comment period on the stewardship
5 practices and education and outreach on
6 coexistence, those comments have been sort of
7 collated within USDA and the next step will be
8 to hold a stakeholder engagement session that
9 may take the form of sort of a listening
10 session/engagement session.

11 Last I heard, the hope was that
12 meeting could take place in December in
13 Washington, and that AC 21 would not reconvene
14 in person until after that listening session.
15 So, I think it is important for the organic
16 community to turn out on that. As soon as we
17 get any word on a date, I will share it with
18 folks, because I think we need to keep
19 pressing.

20 Concrete relief is, as we all
21 know, a very tough fight because really it
22 breaks down on who is responsible. I think we

1 are all in agreement here that organic
2 producers and handlers go to huge extremes to
3 keep GMOs out of organic and sort of up to
4 here with the amount of effort we can put into
5 it versus others.

6 I think it is going to come down
7 to an assessment of USDA's authority and the
8 coordinative framework, and really pushing the
9 envelope on having some measures in place
10 where constraints can be placed on the
11 planting and cultivation of the products of
12 biotechnology, because we have to start there.
13 There has to be some responsibility.

14 So, I am sorry I am not more
15 hopeful about that, though, Nick.

16 CHAIR RICHARDSON: Other
17 questions/comments for Laura?

18 (No response.)

19 No? Okay, thank you very much,
20 Laura.

21 We will now take a lunch break,
22 and the Chair will reconvene at precisely

1 success of organic is due to consumers wanting
2 something with real value, the organic value
3 of protecting food from pesticides and
4 synthetic fertilizers, et cetera, while
5 building a form of agriculture capable of
6 feeding the world with increased nutrition and
7 surely sustainable soil management. After
8 growing organic, the soil is more fertile than
9 before, as opposed to non-organic agriculture,
10 where the soil is left depleted and incapable
11 of feeding anyone without the addition of
12 synthetic inputs made mostly from fossil
13 fuels, which we all know are running out,
14 while also being man's biggest contribution to
15 global climate change.

16 We expect challenges when
17 providing organic products. And we are a
18 manufacturer, and we feel the pain every day.
19 We expect these challenges to continue, and
20 even increase, because our world is heaping on
21 the challenges that organic is facing.

22 Challenges like finding certified

1 organic inputs in a tight supply market and
2 finding ingredients that will keep our
3 products competitive and attractive in the
4 marketplace, and living with the fact that
5 some ingredients simply are not available for
6 use in organic products.

7 We believe that the consumer will
8 not continue to increasingly buy organic if
9 organic stops meaning what they expect it to
10 mean. So, we see it as essential that the
11 process of maintaining standards stays strong
12 and that it is strengthened, not weakened, so
13 that the process forces deep deliberation by
14 the NOSB at every step.

15 Some quick comments on sunset.
16 Sunset is a word used to mean the end of a
17 cycle; for instance, the end of a day. We are
18 baffled as to why the NOP is insisting on
19 changing the sunset review method where a
20 substance sunsets and was removed at the end
21 of five years unless revoted onto a new sunset
22 list. We are at a loss when trying to imagine

1 any reason why this change would be made that
2 is reasonable or in the service of maintaining
3 organic integrity.

4 The NOSB should bring this issue
5 up with the NOP, as it is such a serious
6 weakening of the system to protect organic
7 integrity that it would hurt organic consumer,
8 retailer, manufacturer, and certifier
9 confidence in the NOSB/NOP process, and
10 thereby, hurt organic sales.

11 It is ironic that the organic
12 regulators would choose to redefine a word as
13 well known and connected to a national
14 phenomena as sunset, where each and every day
15 each and every person on earth has a
16 reconfirmation of the meaning of the word.

17 Please insist that sunset remain
18 sunset, and not some artificial definition of
19 a natural phenomenon. Weren't we supposed to
20 be mimicking Nature anyway?

21 A summary of our comments on the
22 seed purity, we have written three comments,

1 one on sunset and two on GMO. And so, on the
2 seed purity, in summary, applying best
3 practice can't be done until you see the
4 otherwise invisible and reproducing invader,
5 the GMOs.

6 To accomplish this, a test is
7 needed. Testing is a required component of
8 any meaningful best practice to avoid GMO
9 contamination of organic crops.

10 On the GMO definition, we prefer
11 that maybe coming up with -- we have detailed
12 comments written, but the common-sense
13 explanation of GMO is very needed. So, we are
14 suggesting a very common language definition
15 of what GMOs are and are not.

16 Thank you.

17 CHAIR RICHARDSON: Thank you.

18 Questions? Comments?

19 (No response.)

20 Thank you very much.

21 The next speaker is Stephen
22 Walker, and then on deck will be Jackie

1 Townsend.

2 MR. WALKER: Good afternoon.

3 I am Steve Walker, and I am the
4 Compliance Manager with MOSA. We certify
5 about 1600 operations, mostly in the Upper
6 Midwest.

7 We submitted a couple of written
8 comments for this meeting, including a
9 combined statement on excluded methods
10 terminology and excluded methods in vaccines.

11 My comments today come with a dose
12 of humility. I am blessed to work with a
13 staff and community filled with a lot of smart
14 people, much like this room. Our MOSA staff
15 includes a number of folks with advanced
16 degrees in ag sciences, earthly practical
17 knowhow, and a lot of common sense. I feel
18 like I have got a pretty good head on my
19 shoulders, but, clearly, I am no geneticist.

20 I am a communications major that
21 fell in with a rather crunchy crowd and found
22 I could bring some gifts and passion to this

1 work. My story is not uncommon in this
2 community.

3 So, we need our experts. We
4 appreciate the many hours the Materials and
5 GMO Subcommittee invested in helping us
6 understand the scope and variety of genetic
7 engineering methods. We need some practical,
8 sensible help, so we can make sound decisions.

9 The terminology discussion
10 document is a good start with good tools, like
11 the FiBL chart and the Cartagena Protocol
12 definitions. But, smart as we are, we
13 recognize our limits.

14 To clearly and consistently use
15 these tools, we feel we need mandated
16 disclosure of clearly-defined excluded
17 methods. Without required disclosure, we
18 question how use of widely-varying, often
19 proprietary methods will be known to organic
20 operators, the public, and the certifiers.

21 The current lack of disclosure is
22 a stumbling block toward our making

1 appropriate decisions in the interest of all
2 organic stakeholders, especially when the line
3 between what is and what is not a GMO is
4 increasingly blurred.

5 Currently, when we know an input
6 might be produced with excluded methods, we
7 request non-GMO verification. But, even now,
8 statements from suppliers have inconsistent,
9 sometimes vague language. The terminology
10 document shows that we do not have sufficient
11 knowledge about GE definitions, what products
12 need verification, and how back in the
13 production chain to check.

14 We want organic to remain a
15 highly-meaningful label. Our current GMO-free
16 message is simple, but this discussion is very
17 difficult. Technology has changed rapidly,
18 and the risks and benefits are uncertain. We
19 must be sound in our standards and sensible in
20 our verification methodology. We need more
21 accountability in the form of public
22 disclosure of the use of GE technology. Our

1 stakeholders demand it.

2 You know, I am not just a crunchy
3 communications major; I am also a preacher's
4 kid. So, I may have also been drawn to this
5 work by recognition of the moral imperative to
6 be a good steward of this earth.

7 In an intersection of upbringing
8 and vocation, a few years back I had a chance
9 to make some comments on another document on
10 this subject, as the Lutheran Church adopted
11 a social statement on genetics, faith, and
12 responsibility. That lengthy documents notes
13 that, with developing technologies, human
14 beings increasingly bear the moral burden for
15 the shape of Nature and the very existence of
16 future generations.

17 The potential benefits also
18 present new levels of danger and ambiguity,
19 and a diligent and sustained attention in
20 order to direct the potential good and to
21 limit potential harm.

22 And with regard to GE technology,

1 the moral questions cannot be addressed
2 without complex knowledge. Those who possess
3 special or expert knowledge relevant to
4 decisionmaking have a moral duty to share what
5 they know with those like us engaged in the
6 process of moral discernment and policy
7 adoption, but there is a call here for two-way
8 humility. We have much to learn; we also have
9 much to teach the experts about good
10 stewardship, earthly practical knowhow, and
11 common sense.

12 CHAIR RICHARDSON: Thank you,
13 Steve.

14 Questions? Comments?

15 (No response.)

16 Thank you very much.

17 MR. WALKER: Thanks.

18 CHAIR RICHARDSON: The next
19 speaker is Jackie Townsend, and on deck is Zak
20 Wiegand.

21 MS. TOWNSEND: Hello. My name is
22 Jackie Townsend, Policy Manager for MOSA.

1 MOSA certifies about 1600 operations, and
2 about 700 of them are livestock operations.
3 I am here to address the Livestock
4 Subcommittee with regard to vaccines made with
5 excluded methods and the GMO Subcommittee on
6 excluded methods terminology.

7 MOSA would like to thank both
8 Committees for the many hours of work invested
9 in these topics, time that ACAs are not able
10 to spend.

11 We have been spending our time
12 performing all of the certification functions
13 that our clients need and spending much staff
14 time for the development of systems, policies,
15 and programs to address the changes required
16 by recent NOP clarifications.

17 We are an evolving industry, and
18 we would like to see our evolution be
19 controlled with practicality, not forgetting
20 soundness and sensibility for certifiers. How
21 can we be sound in our standards and sensible
22 in our verification methodology?

1 Steve Walker, speaking just before
2 me, talked about the importance of the organic
3 label and the need for required disclosure.
4 Of course, we support regulations requiring
5 the disclosure of the use of GE technology.
6 The issue if disclosure is highlighted in the
7 vaccines proposal. The Subcommittee
8 determined that the creation of a list of
9 allowed and prohibited vaccines was difficult,
10 for a variety of reasons, and was unable to
11 develop a list of vaccines made with excluded
12 methods.

13 The other proposed tools, the use
14 of product code and methods-of-production
15 analysis are not sound and sensible tools
16 easily implementable by certifiers. The
17 proposal states that the use of product code
18 does not definitively identify vaccines as
19 made with excluded methods. So, it is unclear
20 how this is a useful tool.

21 If the task of developing such a
22 list of vaccines is challenging for the NOSB,

1 it seems like it would be overly burdensome to
2 pass the task along to certifiers. Without
3 government regulation and increased
4 disclosure, it would be very difficult for
5 organic agriculture to make strides in the
6 goal of refraining from the use of vaccines
7 developed using excluded methods. We are
8 worried that the use of vaccines may be
9 limited by some ACAs.

10 MOSA recognizes vaccines as an
11 essential livestock health and food safety
12 management tool. At this time, we feel the
13 vaccines are categorically allowed by 105(e)
14 and their use is encouraged as a preventative
15 practice at 238(a)(6).

16 The proposal requests that the NOP
17 provide guidance on how to make a
18 determination of whether a vaccine has been
19 produced with excluded methods. We recognize
20 some disagreement on who should provide the
21 guidance, but, regardless, MOSA wants to
22 ensure that any forthcoming guidance process

1 includes ample opportunity for additional
2 public comment.

3 The NOSB has waded through volumes
4 of information in an effort to help ACAs have
5 the tools needed. It seems the Subcommittees
6 have found themselves stuck in a quagmire of
7 confusing scientific terminology, political
8 maneuvering, and legal restrictions. We
9 greatly appreciate the work done, but it seems
10 that we need to, as a community, push for
11 public disclosure.

12 The concluding sentence of the
13 second discussion document drives home the
14 need for increased focus on this issue. And
15 we would add that, without disclosure
16 requirements, the ability to use these
17 definitions and principles would be hampered.

18 MOSA supports sound enforcement of
19 the National Organic Standards to continue to
20 ensure we have an organic label that means
21 something, and in order to soundly enforce our
22 standards, we need sensible information to

1 make clear and consistent certification
2 decisions.

3 We continue to feel that GE
4 technology, including definition, labeling,
5 and public disclosure, is a priority for
6 further research and education.

7 Thank you.

8 CHAIR RICHARDSON: Thank you.

9 Questions? Comments?

10 (No response.)

11 Thank you.

12 The next speaker is Zak -- is it
13 Wiegand? Am I mispronouncing? Good, I got it
14 the second time. Thank you.

15 And on deck is Mike Leventini.

16 MR. WIEGAND: Good afternoon.

17 My name is Zak Wiegand. I'm the
18 Processing Program Technical Specialist for
19 Oregon Tilth.

20 You are probably familiar with
21 Oregon Tilth, but I am going to tell you about
22 us, a little bit about us anyway.

1 We are an advocacy group, an
2 educator, and a certifier. And according to
3 Jim Pierce, we are the best certifier.

4 (Laughter.)

5 We certify around 1500 operations
6 across the country as well as internationally,
7 and it is about a 50/50 mix of handlers to
8 farmers.

9 So, first, I would like to extend
10 a great big thank you to the Materials and GMO
11 Subcommittee for your continuing effort to try
12 to tackle the complex and ever-changing issues
13 surrounding the definition of excluded methods
14 and related terminology.

15 I would also like to thank the
16 entire NOSB for their work and dedication in
17 improving organic standards for all
18 stakeholders.

19 The information provided in the
20 discussion document on excluded methods
21 terminology shows that you have good starting
22 points to move forward with addressing the

1 need to update and clarify the definition of
2 excluded methods.

3 From the use of a guidance
4 document that provides a platform for ease of
5 updating to potentially using a dynamic table
6 listing different types of biotechnology and
7 their acceptability, these are sensible ideas
8 that will help us keep up with the ever-
9 changing landscape of biotechnology while
10 providing some clear and consistent
11 information for certifiers to evaluate to.

12 Additionally, as Zea mentioned
13 yesterday, the Subcommittee will be addressing
14 products produced from genetically-engineered
15 organisms as work on this continues, and we
16 appreciate that this is part of the ongoing
17 work of the Subcommittee. So, we look forward
18 to future work on this and are pleased that
19 these issues will surface with any
20 recommendations that develop from this work.

21 We understand that clarifying the
22 definition of excluded methods is a starting

1 point for this extended project and feel that
2 you have laid good groundwork with this
3 discussion document. And we are looking
4 forward to contributing more support to the
5 Subcommittee as these documents are refined.

6 Once again, I would like to thank
7 the Materials/GMO Subcommittee, the NOSB, and
8 the NOP for your tireless work to improve the
9 organic standards.

10 CHAIR RICHARDSON: Thank you, Zak.

11 Questions? Comments?

12 (No response.)

13 No?

14 Thank you, Zak.

15 MR. WIEGAND: Thank you.

16 CHAIR RICHARDSON: The next
17 speaker is Mike Leventini, and on deck is
18 Lindsay Fernandez-Salvador.

19 MR. LEVENTINI: Good afternoon.

20 My name is Mike Leventini. I am
21 with the Petaluma Poultry out in California.
22 We are also a member of the Methionine Task

1 Force, and we are an organic broiler company
2 on the West Coast. I am going to talk today
3 about kind of where we are on synthetic
4 methionine use in broilers.

5 So, back in 2001, our founder,
6 Alan Shainsky, worked with the USDA and got
7 the ball rolling with organic broilers. At
8 that point, we were allowed to use methionine
9 in the rations.

10 In 2010, we dialed-down our
11 methionine use to a maximum inclusion rate
12 kind of bird type. So, layers and ducks could
13 use four pounds per ton, broilers could use
14 five, and turkeys could use five.

15 The maximum allowed -- and again,
16 this is the maximum for every pound of feed --
17 was cut again in 2012. So, layers and ducks
18 got cut in half. Broilers went from five
19 pounds down to two pounds. They took the
20 biggest brunt of the reduction. And turkeys
21 were at three.

22 Currently, it is the only

1 exception that we use in organic feed. And at
2 two pounds per ton, the feed formulation is
3 99.90 percent organic.

4 So, where do we kind of compare in
5 the United States with everybody else? Well,
6 in Canada, on their organic program, they are
7 allowed to use synthetic methionine in an
8 unlimited amount.

9 The EU doesn't allow synthetic
10 methionine or any synthetic amino acid, but is
11 allowed to feed 5 percent non-organic
12 feedstuffs in their feed. So, they can feed
13 a 100 pounds of non-organic feed per ton.

14 So, as the U.S. poultry industry
15 continues to strive to find a 100-percent
16 solution, however, the solution is not
17 occurring anywhere else in the world in a
18 commercial setting.

19 So, what does that mean to an
20 organic chicken being raised in the United
21 States? Well, in order to feed the chickens
22 what they need, it has been well-documented

1 that plant-based chicken feeds, so no meat
2 byproducts or those kinds of things, they
3 don't match up. Plant-based rations don't
4 match up with what a chicken needs. So, you
5 have to give them a little more methionine.

6 A protein is just an accumulation
7 of a bunch of different amino acids, and
8 plants don't match up with what the chicken
9 needs. So, in order to get them their
10 methionine, we have to feed more protein as a
11 percent of the ration.

12 And we also know, due to Dr.
13 Fanatico's research in 2007, that it doesn't
14 really matter if it is a slow-growing, medium-
15 growing, or fast-growing broiler; they all
16 need this incremental methionine amount,
17 particularly in the starter and grower phases,
18 not when they are putting on big breasts and
19 big legs, but when they are driving organ
20 growth and tissue growth and those kinds of
21 things.

22 Unfortunately, that is also the

1 time when the chickens are inside. They are
2 not outside ranging when they are 18 to 20
3 days old.

4 So, as we fed more protein to
5 these birds to give them the methionine that
6 they need, the birds don't need all that
7 protein. So, they end up excreting out that
8 nitrogen into the manure. The manure ends up
9 deriving more ammonia problems within the
10 house. You get a wetter house with more
11 ammonia. We have to end up spending more
12 propane and more electricity.

13 But that stress on the bird that
14 we cause by feeding this ration when they are
15 also going through vaccination reactions and
16 other things has actually caused more
17 mortality and more morbidity in the chicken
18 house. This is the information I put in my
19 comments about a year ago. From before the 2-
20 pound change, we see an increase of 18 percent
21 in our mortality in these broiler flocks.

22 So, in summary -- I am going fast

1 to get my T-shirt -- worldwide we haven't
2 solved this issue. We are getting by, but
3 current restrictions are resulting in animal
4 welfare and environmental issues.

5 (Signal that time is almost
6 expired.)

7 Missed it (referring to signal).

8 We will continue to research and
9 find alternative sources for synthetic
10 methionine. We are doing feed trials. We
11 have funded testing. We have done all sorts
12 of stuff.

13 But we are going to push for
14 middle ground. We are going to continue to
15 ask that, instead of a max, that we get an
16 average for life of flock. Allow us to feed
17 them more methionine early.

18 And on the broiler side, we are
19 going to ask that we not only get the average,
20 but take us back to the 50-percent reduction,
21 back at the two-and-a-half, as opposed to the
22 60 percent that we took in the last reduction.

1 Thank you.

2 CHAIR RICHARDSON: Thank you,
3 Mike. Thank you very much.

4 Questions on methionine.

5 Francis?

6 MEMBER THICKE: Thank you, Mike.

7 Are you familiar with the recent
8 work on high-methionine corn? Have you looked
9 into that?

10 MR. LEVENTINI: We have tested it
11 early, and I term it "high-protein corn"
12 because, really, we need methionine in a
13 different ratio that is in current soybean
14 meal, for example. And the ratio of
15 methionine really isn't that much different.
16 It is higher protein, but it is not
17 necessarily higher methionine as a ratio.

18 MEMBER THICKE: Okay. So, you're
19 saying that it is like feeding more soybean
20 meal perhaps?

21 MR. LEVENTINI: Yes.

22 MEMBER THICKE: Okay. So, it is

1 like .25 percent with methionine, maybe .3
2 percent methionine. That is getting a little
3 higher, isn't it?

4 MR. LEVENTINI: I think there is
5 some help, but it is not the single issue that
6 is going to help us.

7 MEMBER THICKE: Have you used
8 any --

9 MR. LEVENTINI: It may be helpful.

10 MEMBER THICKE: Have you used any
11 other sources of methionine to supplement?

12 MR. LEVENTINI: We have gone
13 through and done a lot of research, probably
14 looked at 50 or 60 different things. We are
15 continuing to look. Not a lot of those items
16 on that list of things that in life are higher
17 methionine or organically available or
18 available in the amount that we need them.

19 MEMBER THICKE: Okay. And you
20 said that, when the chickens get older, they
21 are outside more; inside, they are inside.
22 Why would they be inside when they are older?

1 MR. LEVENTINI: If I said that, I
2 meant they are inside when they are younger;
3 they are outside when they are older.

4 MEMBER THICKE: Oh, okay.

5 MR. LEVENTINI: But that makes
6 sense. When they are little, they don't have
7 feathers yet. We don't turn them outside
8 until they are fully feathered.

9 MEMBER THICKE: Okay.

10 CHAIR RICHARDSON: Tracy?

11 MEMBER FAVRE: Thanks for your
12 presentation.

13 We are devoting significant
14 resources in the Livestock Subcommittee to
15 discuss methionine between now and February.
16 And I am curious in regards to, if you see any
17 products out there in development -- I know
18 that you said that you haven't found anything
19 on the market now. But are you aware of
20 anything coming to market or under development
21 that might solve the solution to the synthetic
22 methionine?

1 MR. LEVENTINI: There are things
2 in discussion, but I haven't seen anybody
3 actually working on, say, a non-synthetic
4 methionine. I mean, there have been
5 discussions, but I am not aware of anything
6 currently in the hopper.

7 MEMBER FAVRE: And as a follow-on
8 question, one of the things that we have
9 struggled with is there is some concern within
10 the Committee, as well as the Board as a
11 whole, that if we allow an average over the
12 life of the bird, and, of course, if we
13 respond to that as part of the petition
14 response, it resets the sunset date. And
15 there is some concern that, if we allow that,
16 we create a disincentive for development of
17 alternatives. Can you respond to that?

18 MR. LEVENTINI: Well, I think
19 everybody on the Methionine Task Force
20 understands that we have to solve this, right?
21 We would rather be home tending chickens than
22 coming to meetings and talking through this.

1 So, I think we are all really dedicated to
2 solving this issue. It is just a very
3 difficult one to solve.

4 My job or my thoughts today were,
5 while we are trying to get to that endpoint,
6 while we are trying to find that methionine
7 solution, let's understand what we are
8 currently doing and see if a small tweak would
9 really help the animals in the interim.

10 CHAIR RICHARDSON: Harold?

11 MEMBER AUSTIN: Well, I think my
12 question is going to kind of go to that, your
13 concern with that small tweak. Because, you
14 know, we talk a lot about environmental
15 health. We talk a lot about human health.
16 Could you explain to the Board what the
17 decision to refer back to the Subcommittee
18 this past spring has done to the health of the
19 flock currently as it exists today with what
20 you guys are having to do in order to meet the
21 methionine needs? And what are the current
22 conditions with the flocks?

1 MR. LEVENTINI: So, what has two-
2 pound max done to our chickens? So, there
3 will be other folks up here that can maybe
4 address the layer. I am a broiler guy. But
5 I think this particular slide here shows that
6 from before, when we were unrestricted, to
7 where we are now, there's 18-percent more
8 mortality.

9 So, during that young chicken as
10 it is growing -- it is primarily upfront when
11 that chicken is growing. They are going
12 through vaccination reactions. This high-
13 protein feed that we are feeding them in order
14 to get the methionine they need causes a lot
15 of stress in that animal's tummy, and they get
16 opened up to things like necrotic enteritis
17 and other things that actually drive a little
18 bit more mortality. Not only do you get
19 mortality, but morbidity.

20 The lack of production and the
21 stress on the animal is increased as well.
22 That is seen through wetter litter, increased

1 ammonia, increased mortality.

2 CHAIR RICHARDSON: Thank you.

3 Mac?

4 MEMBER STONE: Were you on the
5 Methionine Task Force back when the decision
6 was made to step down from this four to two or
7 five to two, five to three? How were those
8 step-downs calculated and where is that in --
9 if the number, if you could calculate what it
10 is that the corn/soy diet doesn't provide,
11 what would the number be for a broiler?

12 MR. LEVENTINI: On a percentage
13 basis?

14 MEMBER STONE: Yes.

15 MR. LEVENTINI: So, to answer the
16 first part of your question, I have no idea
17 where the step-down numbers came from. I
18 think, as a group, we were all concerned that
19 we were going to lose methionine 100 percent,
20 which would have crushed us. So, I think we
21 were all kind of willing to take two because
22 we could probably find a way to get to two, to

1 do something. And by reacting to two pounds,
2 you can see what it has done to our mortality.

3 I don't know where the numbers
4 came from. I was involved with the Methionine
5 Task Force, but I don't know where the numbers
6 came from.

7 We have our nutritionist coming up
8 in a bit. Maybe he can speak to what
9 percentages we need.

10 But I would say 5 or 6 percent
11 would be a normal level of additional
12 methionine in a protein-based feed. So, we
13 are feeding a third of what they need, and we
14 are having to increase the food protein to get
15 there.

16 Did that answer your question,
17 Mac?

18 CHAIR RICHARDSON: Nick?

19 MEMBER THICKE: One more quick
20 question. You said in Europe they allow 5
21 percent.

22 CHAIR RICHARDSON: Hold on,

1 Francis.

2 MEMBER THICKE: Oh, I thought you
3 said yes. I'm sorry.

4 CHAIR RICHARDSON: No, there are
5 two more people.

6 MEMBER THICKE: Oh, I'm sorry.

7 CHAIR RICHARDSON: Yes.

8 MEMBER MARAVELL: I am just
9 interested in the statement up there that
10 methionine needs do not differ in broiler
11 types, slow-, medium-, and fast-growing. Are
12 you saying that the absolute amount of
13 methionine doesn't differ or that the
14 percentage of methionine of total feed doesn't
15 differ?

16 MR. LEVENTINI: I will have to go
17 back and check, triple check, but I believe it
18 is percentage, because what happens is --

19 MEMBER MARAVELL: Right, right.
20 Exactly.

21 MR. LEVENTINI: -- it is feed
22 intake, right.

1 MEMBER MARAVELL: It is the
2 balance?

3 MR. LEVENTINI: Right. Correct.

4 MEMBER MARAVELL: Yes, exactly.

5 MR. LEVENTINI: Yes.

6 CHAIR RICHARDSON: Calvin?

7 MEMBER WALKER: How would you
8 define the term in the context of feed
9 nutrient, something that is marginally
10 adequate?

11 MR. LEVENTINI: I'm sorry, I don't
12 understand the question.

13 MEMBER WALKER: If a nutrient
14 amino acid such as methionine is considered in
15 the poultry ranch as marginally adequate, what
16 does that connote to you?

17 MR. LEVENTINI: Well, I don't know
18 if you are driving towards malnutrition or
19 what we are talking about. But, certainly,
20 all the protein, all the diets go back to
21 years and years and years of research out
22 there for cattle and sheep and pigs and

1 chickens.

2 And we are doing the best thing we
3 can to try and increase the protein and give
4 these chickens balanced rations. When you
5 don't give them balanced rations, when
6 something is missing, the chickens or the
7 cattle or the sheep, they will look for it and
8 they will pick feathers or they will react in
9 certain ways, and they are trying to find
10 things that they need. And that is how the
11 birds react to a diet that is marginally
12 nutritious or marginally giving them what they
13 need.

14 I hope I answered your question.

15 MEMBER WALKER: Does the term mean
16 that it is adequate?

17 MR. LEVENTINI: I'm sorry, I still
18 don't understand what you're getting at.

19 MEMBER WALKER: The term
20 "marginally adequate," does that mean to you
21 that what is in the diet is adequate, but just
22 right at the margins?

1 MR. LEVENTINI: Did I say
2 "marginally adequate"?

3 MEMBER WALKER: Oh, I was asking
4 for the term. How would you define it?

5 MR. LEVENTINI: Oh, well, I think
6 adequate is adequate, right? The only thing
7 I need, when you go off of these things, I
8 mean, there is all this research that says
9 chickens need this. So, I don't know that
10 without seeing particular data if I can
11 answer, if they need .5, that .4 is marginally
12 adequate. It would depend on what we are
13 talking about, I think.

14 CHAIR RICHARDSON: Francis, you
15 had a question?

16 MEMBER THICKE: Yes. You said in
17 Europe they allow 5-percent non-organic in the
18 ration, correct? Does that include synthetic?

19 MR. LEVENTINI: Well, what I
20 looked up and when I talked to the few
21 nutritionists, they talked about -- and here
22 is the thing here -- no synthetic amino acids.

1 And so, in that 5 percent there were no
2 synthetics, but you could feed non-organic
3 feedstuffs.

4 MEMBER THICKE: What would that
5 be? Do you know?

6 MR. LEVENTINI: Hay or different
7 things that were not organically approved.

8 MEMBER THICKE: But they could
9 have organic hay as well, I guess.

10 MR. LEVENTINI: Yes, I haven't
11 done enough research to understand what they
12 are actually feeding, but they can feed 100
13 pounds a ton.

14 CHAIR RICHARDSON: Wendy?

15 MEMBER FULWIDER: I think maybe
16 the way to answer Calvin's question is, if we
17 have the stats to know if the mortality is
18 significantly different with the different
19 levels in methionine that you had on your
20 slide.

21 MR. LEVENTINI: Okay. I can go
22 run the stat packages, but I feel very

1 confident that it is. But I can go do that
2 and get back to the group.

3 CHAIR RICHARDSON: Good. That
4 might be very helpful.

5 MR. LEVENTINI: Yes, there's over
6 500 data points there.

7 CHAIR RICHARDSON: Calvin?

8 MEMBER WALKER: I think it also
9 will be answered -- you had mentioned that
10 there would be a nutritionist coming up?
11 Because I think they could also shed light to
12 this particular definition.

13 MR. LEVENTINI: Of marginally
14 adequate?

15 MEMBER WALKER: Yes.

16 MR. LEVENTINI: Okay.

17 MEMBER WALKER: Okay.

18 CHAIR RICHARDSON: Great. Thank
19 you very much. You have been very helpful.

20 MR. LEVENTINI: Thank you.

21 CHAIR RICHARDSON: We appreciate
22 it.

1 The next person up is Lindsay
2 Fernandez-Salvador, and then, we will have Dr.
3 Rangan and her son Max.

4 MS. FERNANDEZ-SALVADOR: So, is
5 this thing reset now? Okay. Okay. Thanks.

6 Thank you for the opportunity to
7 comment today.

8 I am Lindsay Fernandez-Salvador,
9 and I am the Technical Director at Armory.

10 Today I want to talk mainly about
11 contamination and inputs, but also touch on
12 the idea of ancillary substances as they
13 relate to their presence in other inputs
14 besides processing ingredients.

15 I believe that Armory provides the
16 most comprehensive and consistent level of
17 analysis for all types of contaminants and
18 inputs in the organic industry and quite
19 possibly the world. Therefore, by most
20 standards, that would make us an expert in
21 this subject matter.

22 Our written comments gave the

1 standards and requirements that Armory has in
2 place for various contaminants outlined in the
3 regulations at 205.203. So far, those
4 standards seem to root out most problems and
5 are useful to operators.

6 Therefore, we have come to the
7 conclusion that contaminants are not a
8 significant threat to the organic sector.
9 Most inputs are free of contaminants, such as
10 heavy metals, pathogens, and pesticide
11 residues. However, there have been high-
12 profile cases of pesticide residue
13 contamination in compost, as outlined in the
14 discussion document, that brought this issue
15 into focus for Armory in a very public and
16 messy way.

17 What we learned from that
18 experience is that there is a need for
19 transparent requirements for pesticide
20 residues in compost. I want to be clear,
21 however. We are not necessarily advocating
22 for thresholds or testing, but, rather, for a

1 consistent, transparent standard that
2 everybody must be held to. That standard
3 could be that we don't test inputs at all or
4 we assess risk based on feedstocks or we
5 advise compost users to be aware of pesticide
6 residues. It could be any standard; it just
7 needs to be transparent and clear.

8 If we do start talking about
9 testing for pesticide residues, I urge you to
10 consult with the composting industry and
11 collaborate with them to make a reasonable
12 recommendation. There should be careful
13 thought to testing methods, frequency,
14 followup, corrective actions, and
15 consequences. There should be a method for
16 the composter to mediate any problems and get
17 their product reapproved. The last thing we
18 want to do is discourage the use of recycled
19 food waste by getting so detailed that there
20 is no compost free of contaminants.

21 On ancillary substances and
22 microorganisms, we urge you to consider the

1 implications of your recommendation on other
2 uses for microorganisms. For example,
3 livestock feed contains microorganisms which
4 may contain those same ancillary substances.
5 If we allow those for processing ingredients,
6 but not in livestock feed, it is illogical and
7 difficult to defend.

8 And we want to also address the
9 fellow who talked about using an enzyme in his
10 liquid fertilizer product. This is another
11 example of how ancillary substances and
12 processing materials are also present in non-
13 synthetic ingredients in fertilizers. If you
14 allow ancillary substances in processing
15 ingredients, other uses of those same
16 ingredients should be considered.

17 Finally, please talk about
18 bacterial phages when you talk microorganisms
19 today or this meeting, so that we can
20 understand whether or not they are covered
21 under the microorganisms listings at
22 205.605(a).

1 Thank you very much for the
2 opportunity to comment.

3 CHAIR RICHARDSON: Thank you.

4 Comments? Questions?

5 (No response.)

6 Thank you very much.

7 Dr. Rangan and Max, and Terry
8 Shistar on standby.

9 DR. RANGAN: Good afternoon.

10 My name is Urvashi Rangan. I'm
11 the Director of Consumer Safety and
12 Sustainability at Consumer Reports. I am glad
13 to be here today, and I want to thank the
14 members who are rotating off this session for
15 their very, very hard work. Thank you.

16 We at Consumer Reports are very
17 concerned about where things are right now on
18 sunset and the discriminatory use of really
19 what are explicitly-prohibited materials in
20 the law and the use of artificial ingredients.
21 And our role at Consumer Reports is to help
22 educate people about what organic means as

1 well as what it doesn't mean. And we also
2 look to see scientifically what can consumers
3 expect out of organic, why they are willing to
4 pay more for it, why they are willing to buy
5 it at all. And in the course of doing that,
6 what they expect from it when they do so.

7 Charlotte Vallaeys and I have been
8 rating and evaluating labels on food, dozens
9 of labels, all year long. And all of that
10 information is available for free at
11 greenerchoices.org.

12 We bring today and tomorrow, when
13 Charlotte testifies on the materials, that
14 kind of broad expertise in looking at a
15 variety of different label programs. Organic
16 is slipping. And as a result, we have
17 downgraded its rating from highly meaningful
18 to meaningful. You can read on Greener
19 Choices exactly what, but we are extremely
20 concerned about the way things are doing and
21 where things need to go.

22 We, again, do national surveys.

1 We run the polls largest to the Census in the
2 country or next to the Census. And we believe
3 empirical data is incredibly important.

4 Having listening sessions, talking to people
5 on the phone, that is anecdotal information.
6 That doesn't give you a scientific basis to
7 inform you of what consumer expectations are.

8 So, I want to go through a few of
9 our survey findings. Seventy-four percent of
10 consumers -- and these are nationally-
11 representative surveys -- mistakenly believe
12 there are no artificial ingredients used in
13 organic foods. They are being misled to think
14 that.

15 Eighty-nine percent actually
16 expect there to be no artificial ingredients.
17 When it comes to artificial ingredients in
18 processing, 76 percent of people don't think
19 it is in foods labeled organic. They are
20 mistaken. Ninety-one percent of people do not
21 want it to be in there.

22 When it comes to no antibiotics

1 being used, you see similar response rates.
2 And again, the loophole that would allow
3 chickens to be fed antibiotics or administered
4 antibiotics up to day two of life is
5 inconsistent with those expectations. It is
6 inconsistent with the way the program markets
7 organic.

8 And I have seen this bag, and I
9 have written down some of the more accurate
10 phrasings that ought to be on this bag. It is
11 no antibiotics except for those chicks are fed
12 up to day two of life. It is no artificial
13 colors, preservatives, or flavors, but there's
14 other artificial things that are allowed.
15 Even in the marketing of the program on
16 organic, it is easy to see how consumers are
17 being misled out there.

18 As I said, we have also looked at
19 a variety of different label programs, and I
20 want to talk a little bit about those because
21 they are exceeding organic. And we are now
22 able to tell consumers to look for organic and

1 bird-friendly or organic and biodynamic
2 because it means more.

3 Those particular programs actually
4 require products to be organic in the first
5 place, and then, they add more value. They
6 don't allow things like methionine in
7 biodynamic. They don't allow phosphate-based
8 leaveners in biodynamic. They are doing more
9 than this program is when it comes to the use
10 of artificial materials and ingredients in the
11 program and in the standards that they
12 require.

13 There are simply labels that are
14 surpassing organic in various spaces. Animal
15 welfare approved is another one that has space
16 requirements for animals. Most people want
17 that.

18 We are delivering today the
19 results of our surveys from March 2014 and
20 April 2014 to you today, so you can see the
21 complete results. And I will submit those all
22 to Michelle.

1 Thank you.

2 CHAIR RICHARDSON: Thank you.

3 Do you want to have your son speak
4 first before you take questions?

5 DR. RANGAN: No, I'll take them
6 now.

7 CHAIR RICHARDSON: You'll take
8 them now?

9 DR. RANGAN: And then, I will let
10 Max speak after. Thank you.

11 CHAIR RICHARDSON: Okay.
12 Questions?

13 Calvin?

14 MEMBER WALKER: Thanks for your
15 report. And I just appreciate Consumer Union
16 because you represent over 8 million
17 individuals.

18 If there is a way in the future
19 that we could turn it back up again -- we have
20 been downgraded -- if there is a path that
21 NOSB can -- Robert Kennedy says a mistake is
22 not a mistake until you refuse to correct it.

1 DR. RANGAN: That's right. Thank
2 you, Calvin.

3 MEMBER WALKER: So, if there is a
4 way that we could get that grade back up --

5 DR. RANGAN: It is really pretty
6 clearly outlined in the label record for the
7 organic program as to why we took these steps.
8 It was actually a very difficult decision. We
9 did a lot of deliberating on it. We do
10 comparative ratings at Consumer Reports.

11 And when you simply look at the
12 other label programs and what they are doing
13 compared to what they are saying they are
14 doing, they are doing a whole lot better.

15 And so, when it comes to organic,
16 things like we have mentioned today, the no
17 antibiotics, and making sure when we use
18 artificial ingredients, we are doing it with
19 a very careful eye, because 71 percent of
20 people don't even want it in there to begin
21 with. So, people don't want these things. We
22 need to kind of acknowledge that.

1 And you will be able to read
2 clearly in the record where it is we expect
3 improvements to be made in order for that
4 rating to go up again.

5 Thank you.

6 CHAIR RICHARDSON: Zea?

7 MEMBER SONNABEND: Thank you,
8 Urvashi.

9 I just did a word search in OFPA
10 and I didn't see the word "artificial" in
11 there anywhere. We commonly use the
12 terminology "synthetic".

13 And particularly in regards to
14 something like, say, sulfur or pectin or
15 magnesium chloride, these are not generally
16 thought of as artificial; they are not analogs
17 of natural things that are synthetically-
18 derived.

19 So, I wonder why your scientists
20 think that using the word "artificial" in your
21 survey has the same meaning and/or connotation
22 as "synthetic".

1 DR. RANGAN: Yes, great question,
2 Zea. I mean, we have been in the role of
3 communicating with consumers since 1936. And
4 the fact of the matter is that sometimes you
5 have to speak in a little more conventional
6 lingo. And so, artificial is a lay way of
7 talking about synthetic.

8 And I'll say you're right,
9 sometimes there are natural things that are
10 processed with artificial ingredients or we
11 have issues with how they are processed, and
12 we do. And Charlotte will be making extensive
13 comment on that when it comes to the materials
14 that are under your purview right now.

15 The fact of the matter is that it
16 is about artificial ingredients. Synthetic
17 means it is something that is not made in
18 nature. It isn't natural. It is synthetic;
19 it is artificial.

20 And when it comes to processing,
21 as you will see in our surveys, we actually
22 went to the extra step of asking people about

1 artificial processing aids as well and whether
2 they expect to have those in organic as well.

3 So, while I understand we are not
4 using very scientifically-technical terms, if
5 people don't understand the question in a
6 survey, they can't possibly answer it
7 accurately.

8 CHAIR RICHARDSON: Harold?

9 MEMBER AUSTIN: Thanks, Urvashi,
10 for being here and for giving your
11 presentation today.

12 When you started, you talked about
13 the indiscriminate use of the materials on the
14 National List. Could you define that or give
15 us a little more clarification on that,
16 please?

17 DR. RANGAN: Yes. Sure. I think
18 when it comes to artificial ingredients being
19 used, and then, how they are retired after
20 five years, Harold, the first survey we did in
21 March really starts to get at those issues.
22 "Do you want those to be in there in the first

1 place?" The answer is generally no.

2 "If they have to be used in there,
3 what do you think about a sunset? Do you
4 think five years is too short or just the
5 amount of time, too long?" So, we have asked
6 about that.

7 And then, we say, "And what do you
8 think should happen at sunset?"

9 And what is really clear from all
10 of these responses as we dig down is that we
11 need to be far more discriminating about what
12 it is we allow on that list and make sure that
13 it is very carefully deliberated on, that we
14 absolutely need it.

15 In order to create those organic
16 alternative incentives, we strongly believe
17 you need that five-year period to develop
18 those, so you can get synthetic materials off
19 the list. And that incentive needs to be
20 nailed to the floor. Otherwise, you don't
21 have an incentive, and we have seen that over
22 and over again.

1 So, those things have to be built
2 in. People want to make sure, if they are
3 going to be used, that when they are done with
4 after five years, that they are dealt with
5 very, very carefully and appropriately.

6 And the more we listen to the NOP
7 describe what they are going to do at the end
8 of that period, the less and less it is
9 becoming discriminatory use. The fact that
10 these materials can remain on the list, maybe
11 they will get an invalidated checkmark. It is
12 really what is a sunset after all. Now we
13 need rulemaking to get things off the list.
14 This simply doesn't comport with what the law
15 actually says and what it requires, what you
16 market organic as, and what consumers expect
17 it to be.

18 Thank you.

19 CHAIR RICHARDSON: Colehour?

20 MEMBER BONDERA: Thank you for
21 your presentation. And I don't mean to make
22 Max wait too long. So, I am sorry you're

1 answering a lot of questions, but, hopefully,
2 he is staying awake.

3 Listen, I guess I was writing down
4 while you were talking, and I just want you to
5 speak for at least a moment about, you know,
6 we are the NOSB and that is what this meeting
7 is. And some of your observations or
8 comments, I am not going to say they are
9 directed at the program, but they are about
10 what the NOP is doing.

11 And you have alluded a little bit
12 to my question, but I want to see if you can
13 take it any further, which is, what can we,
14 the NOSB, be doing? I think I can infer from
15 what you were saying we could stop sort of
16 voting for synthetics to be allowed, is maybe
17 one thing I could interpret.

18 But I guess my question is, you
19 know, is what you are presenting just
20 presenting what is happening versus it brings
21 up the question, you know, where and how can
22 we, the NOSB, or is it the NOSB that can do

1 some changes, or is it really more about the
2 NOP? I guess that is what I would like you to
3 address.

4 DR. RANGAN: Sure, Colehour.
5 Thank you.

6 MEMBER BONDERA: Thank you.

7 DR. RANGAN: Yes. I think, in
8 four minutes, the focus is on sort of what is
9 wrong and where things are sort of off the
10 rails. And I think it is and should be
11 inferred, but I will say it point-blank, that
12 we do look at this Board as the guardians of
13 this program. You are statutorily charged
14 with reviewing materials and making
15 recommendations about those materials. We
16 want you to have every bit of that authority.

17 We want you to be able to present
18 your recommendations in a logical manner that
19 doesn't obfuscate your own opinions. So, if
20 you are having to vote something down in order
21 to vote it up later, that is nonsense. The
22 American public doesn't want you to do that.

1 We want you to be true to what you believe and
2 what needs to be done, and we need to have a
3 logical forward-thinking process.

4 In so many ways, this process has
5 been rolled back over the last 18 months so
6 badly. And there were already issues 18
7 months ago. The problem now is you all are
8 really being stripped of these authorities and
9 having to behave in a way that is not
10 supportive of your authority, is not
11 supportive of what the American public thinks
12 you should be doing, and is relying on you to
13 do to ensure that, when it comes to material
14 use in this program, that we are being as
15 discriminatory and as careful as possible.
16 And that job lies in your hands.

17 CHAIR RICHARDSON: Jay?

18 MEMBER FELDMAN: Thank you,
19 Urvashi.

20 I guess I would like you to talk a
21 little bit about something I grapple with, and
22 I think many Board members grapple with. And

1 that is, how does all this technical review
2 and process stuff translate into public trust?
3 And I know that is a hard thing to quantify in
4 a sense, and you don't know that you have lost
5 the public trust until you have actually lost
6 it sometimes.

7 So, I am wondering if you can help
8 Board members, from your perspective -- and,
9 of course, I do want to underscore that over
10 the years of developing public trust in this
11 label, you know, the predecessors to this
12 Board and the creators created, at least in
13 the PPM, an expectation that this Board would
14 listen very carefully to you, as a consumer
15 rep, and to others who are trying to explain
16 to this Board how we get to meeting consumer
17 expectations, and that mechanism of how. Do
18 we trust you? Whose survey do we trust? How
19 do we translate that into some behavior or
20 voting pattern, or what have you?

21 So, my question is, given the
22 surveys you have done and given what you have

1 watched over this last year and historically,
2 how do we translate our work, how does this
3 Board translate its work into meeting public
4 trust? And what have you seen in terms of the
5 evaluation of both governmental labels and
6 non-governmental labels, voluntary labels?

7 How have you seen that trust issue
8 manifest itself, so that you could give some
9 guidance to the deliberation of this Board
10 when they are struggling with, well, I don't
11 think that is going to make a difference;
12 people don't care, or whatever they are
13 thinking?

14 DR. RANGAN: Yes. I mean, I think
15 that is exactly why we do these surveys, Jay.
16 It is in a way a barometer of trust. And in
17 asking people what you think a label means and
18 measuring that against the baseline of what it
19 does mean, you can start to see where people
20 are being misled. Now, once people understand
21 they are being misled in a very absolute way,
22 you can start to erode trust in a direct way.

1 But I think looking at these
2 surveys, it is a proxy for trust and it is an
3 opportunity to actually get some insight in,
4 again, a data-driven, scientific way, and for
5 you to understand what empirically you may be
6 doing to consumer opinion out there, and what
7 consumer opinion is.

8 This hasn't changed all that much.
9 So, it is not as if these numbers swing like
10 a pendulum from year to year. They are pretty
11 consistent. And in the 12 years we have been
12 doing surveys on organic, we get very, very
13 consistent results.

14 I think the other thing to keep in
15 mind is we are not in a vacuum here. I mean,
16 these things happen in these ballrooms far
17 away from organic food, but we are not in a
18 vacuum. And you are in a marketplace
19 operating with a lot of other label programs,
20 and there is more and more coming up. And
21 they see the opportunities that organic has
22 missed. And so, they will fill in those gaps.

1 And eventually, if you don't want
2 to deal with certain things or the program
3 doesn't want to deal with certain things,
4 other labels will come in. And ultimately,
5 they will offer consumers the value that they
6 are looking for.

7 Consumers are getting smarter and
8 smarter about the choices that they are
9 making. And, you know, when we started rating
10 these labels 15 years ago, we asked, are they
11 meaningful; are they verified; are they
12 consistent; are they transparent; are they
13 independent? Those questions now are almost
14 not becoming obsolete, but they are the first
15 tier of questions you ask.

16 Now we ask things about feed,
17 about drug use, about access to the outdoors,
18 about space requirements for animals. And
19 when you look, for example, on Greener Choices
20 right now, we have a chicken chart that is
21 based on these very discreet sustainability
22 attributes. Organics pretty much in the

1 middle of the road. They are plenty of labels
2 out there that are doing a lot more when it
3 comes to animal welfare than organic is.

4 Meanwhile, you know, you all have
5 parked some very good recommendations at the
6 door with regard to space requirements for
7 animals. We need to get on with those things
8 because you are being beaten by other labels
9 who are doing a better job of that.

10 And when it comes to these humane
11 labels out there which people think organic
12 ought to be, people expect a lot more than
13 what the organic program is providing to them.

14 So, you can wait until trust
15 erodes completely, but it will be very
16 difficult to recover. And what we are trying
17 to do, and the reason we come to every meeting
18 isn't because we just love to talk about the
19 problems with organic. We are out there
20 telling people what it is, what it isn't. We
21 have a campaign to ban the natural label, to
22 have consumers focus on this program as the

1 true natural.

2 But I can tell you I get
3 questions, too, on talk shows letting me know
4 that they organic is bogus; it cheats people;
5 it is not doing what it ought to. And I say,
6 if you actually care about sustainable ag,
7 please come to these public meetings and make
8 your voice heard, because people need to hear
9 that. They need to hear the anger that people
10 have in feeling cheated. And that is what is
11 important.

12 So, in terms of what organic is
13 doing or not doing as it relates to public
14 trust and expectations, you need to look in
15 front of you, but you also need to look behind
16 you to see what else is coming down the train
17 tracks, because other labels are coming, and
18 they are surpassing organic in many spaces.

19 CHAIR RICHARDSON: Thank you,
20 Urvashi. Would you like to introduce Max now?

21 DR. RANGAN: I would. So, I am
22 really happy to introduce -- and a lot of you

1 know him from even being in my tummy eight
2 years ago and being at these meetings and
3 knitting sweaters -- but Max is eight, and he
4 has heard a lot about organic over the years,
5 and he is really happy to testify today.

6 So, Max, let's get you up here.

7 CHAIR RICHARDSON: And as Max is
8 getting up there, I would like to ask those of
9 you that wish to take photographs, the rights
10 of children to have their photographs taken is
11 protected. And so, if you want to take his
12 photograph and, then, use it, you should seek
13 the permission of his mother.

14 DR. RANGAN: You may take his
15 picture.

16 (Laughter.)

17 How are you? Okay.

18 MR. ROSSITER: Hello. My name is
19 Max Rossiter. I am from the Bronx, and I
20 thank you for letting me say a few words
21 today.

22 When I told my friend Otis that I

1 was going to give a public comment to the
2 government, Otis said he didn't believe me.
3 He said people need to be way more popular to
4 talk to the government.

5 (Laughter.)

6 I have known about organics since
7 I was five or six years old, but I learned
8 that organic is truly natural. It is not
9 supposed to come from chemicals or food
10 coloring or artificial ingredients, but it
11 should all come from Nature.

12 Sometimes my Mom tells me about
13 bad things in certain foods, like arsenic in
14 rice and mercury in tuna. But I do eat a lot
15 of good food like broccoli, kale, apples,
16 peaches, grapes, and all sorts of berries. We
17 drink a lot of milk, too, and we eat a lot of
18 different meat, like chicken and beef, and I
19 really like lamb a lot.

20 Organic meat is so important
21 because it is supposed to come from animals
22 that had a good life, ate grass, got to play

1 outside and roll in the mud. If chickens
2 don't go outside, then that is not natural and
3 it is not organic.

4 I think organic animals should
5 have a really good life and that they
6 shouldn't eat any artificial ingredients. I
7 also don't think that the healthy chickens in
8 the egg or when they hatch should get any
9 drugs for growing up.

10 One thing I have been learning
11 about in my school is figures of speech. One
12 of my favorite ones is about people in glass
13 houses who should not throw rocks.

14 In getting ready for this talk, my
15 Mom asked me what a sunset was. I know that
16 sunsets are something my family likes to watch
17 on vacation. My Mom explained that sunsets
18 are also something that should happen to
19 artificial ingredients and chemicals that have
20 been allowed to be used for five years.

21 Like I said, I don't think those
22 things belong in organic food, but if they

1 are, then a sunset should mean that after five
2 years the use of that ingredient will get
3 flatter and flatter, and then, it would just
4 go like the sun does when it fully sets.

5 Thank you very much for listening
6 to me today. I hope that it was helpful to
7 hear from someone who is eight and who thinks
8 a lot how important organic should be and how
9 pure it should be.

10 (Applause.)

11 DR. RANGAN: Any questions for
12 Max?

13 (Laughter.)

14 MEMBER STONE: I would just like
15 it if he would come up to get his T-shirt.

16 (Laughter.)

17 DR. RANGAN: Oh, Max, do you want
18 to go up and get your T-shirt?

19 (Applause.)

20 MS. SHISTAR: Talk about a tough
21 act to follow.

22 (Laughter.)

1 CHAIR RICHARDSON: Michelle is
2 going to get the slides up there.

3 All right, Terry, now that is a
4 hard act to follow.

5 MS. SHISTAR: Now wait a minute.
6 This was perfectly timed.

7 (Laughter.)

8 CHAIR RICHARDSON: Oh, okay.
9 Good.

10 So, Terry is up, Terry Shistar,
11 followed by Gwendolyn Wyard.

12 MS. SHISTAR: Okay. Michelle, is
13 this going to start? How do I just tell it to
14 start? Maybe you have to push "Go".

15 My name is Terry Shistar, and I am
16 on the Board of Directors of Beyond
17 Pesticides. Our direction comes from a Board
18 composed of organic farmers, scientists, farm
19 workers, medical practitioners, land managers,
20 attorneys, and activists.

21 I introduce a new scroll today, an
22 update to NOP's scroll. We have to be careful

1 because parts of it are torn.

2 NOP says that the list of
3 substances in sunset review will be published
4 on the NOP website with enough lead time for
5 both NOSB review and USDA action. The
6 announcement of the Sunset 2015 materials is
7 not easy to find. There's no announcement of
8 Sunset 2016 materials, despite the fact that
9 this meeting is the last chance for timely
10 public comment. The announcement for the
11 Sunset 2015 materials did not state that the
12 spring 2014 meeting was the last time for
13 timely comment.

14 The Federal Register notice
15 announcing the first meetings, according to
16 NOP, will request public comments on each
17 substance under sunset review. Well, the
18 announcement of the spring 2014 meeting did
19 not mention sunset. The announcement of the
20 fall 2014 meeting mentioned sunset, but did
21 not state that the comments on Sunset 2015
22 materials would be untimely, nor that the

1 meeting would be the last chance for timely
2 public comment on Sunset 2016 materials.

3 The purpose of the first meeting
4 is for the NOSB to hear new information about
5 each substance. Well, checklists and
6 Technical Reviews need to be available before
7 this meeting, the only one at which the NOSB
8 will accept public comments to be considered
9 as part of the review.

10 NOP says, if warranted, the NOSB
11 Subcommittees can develop proposals to remove
12 substances. Any proposal to remove a
13 substance must be justified using the
14 evaluation criteria in OFPA and the USDA
15 organic regulations. Step four only requires
16 the Subcommittee to decide whether the
17 material will be considered for delisting.

18 Prior to this meeting, the
19 Subcommittees, without notice, changed the
20 policy announced by the NOP and brought forth
21 proposals to delist without the required
22 support.

1 Step four also prohibits changing
2 annotations at sunset, directing those who
3 want to do so to the petition process.

4 However, there are good reasons to allow
5 annotation at sunset.

6 In step five, AMS requests more
7 comments and the public can respond, but what
8 happens to those comments? NOP says that NOSB
9 members may make motions to delist sunset
10 substances, which require a two-thirds
11 majority to pass. OFPA requires the NOSB to
12 vote to allow exemptions to the default
13 prohibitions of synthetic inputs or non-
14 organic ingredients.

15 NOP says new information presented
16 at the second voting meeting will be
17 considered untimely. Oh, they don't count.
18 The public is invited to submit comments that
19 don't count.

20 At the conclusion of the
21 discussion at the second meeting, the NOSB
22 Chair confirms that the NOSB review is

1 complete. So, the NOSB Chair is deciding for
2 the whole Board.

3 NOP has pointed out numerous
4 hurdles that OMB sets for significant rules,
5 but did you know that no sunset decision has
6 ever been found to be significant? So, why is
7 this whole process important? As NOP pointed
8 out, courts can find a rule unlawful if
9 process is ignored.

10 I think you must have turned off
11 the timer.

12 (Laughter.)

13 CHAIR RICHARDSON: Thank you,
14 Terry.

15 Questions? Comments?

16 Colehour?

17 MEMBER BONDERA: Thank you, Terry.

18 I am left with the question or
19 thought of, that said, then what? Like what
20 can we do, what can the NOSB -- I don't know.
21 I guess, again, back to along the lines of
22 what I said to Urvashi. Are you talking to

1 the NOP or are you talking to the NOSB, is I
2 guess part of my question. But I guess you
3 have to answer it related to the NOP, too.
4 But how can this process be finetuned or made
5 to function? Or what would you suggest?

6 MS. SHISTAR: Okay. Well, Amy
7 Simpson will be talking more about the
8 legalities of the process. And my comments
9 were really directed at the practicalities of
10 the way the process has so far emerged.

11 And so, yes, I was pointing out
12 the problems again. And I think that there
13 are some things that are within the power of
14 the NOSB to do that would help the process
15 work better. Some things the NOP has to do,
16 and some things the NOSB has to do.

17 But here are just a few.
18 Actually, I think I have got a slide here.
19 So, the two-meeting sunset process could be
20 easily improved by taking three steps.

21 One is to require Subcommittees to
22 produce documented checklists for the first of

1 the two meetings and update them for the
2 second meeting. That would give public
3 commenters like me something to talk about.

4 And the second one is allowing
5 Subcommittees to propose annotations at the
6 second meeting that is addressing those
7 things, and being able to do that because
8 there's already a policy that applies to
9 substantive changes to a motion at a meeting.
10 So, you could allow substantive comments to be
11 considered at the second meeting as long as
12 you apply the separate policy on substantive
13 change to a motion at the meeting.

14 And I think that that would make,
15 that those three things would make this two-
16 meeting process a lot more effective.

17 CHAIR RICHARDSON: Zea?

18 MEMBER SONNABEND: Terry, in your
19 written comments you contended that we hadn't
20 listed all the ancillary substances for
21 microorganisms. Yet, we surveyed all the
22 surveyors, the certifiers. I waded through

1 dozens of spec sheets. And that tract
2 represents all we found. Could you please
3 give examples of ones that we did not list?

4 MS. SHISTAR: I would be glad to
5 send you some, but I don't have that writeup;
6 I don't have that with me.

7 MEMBER SONNABEND: Okay.
8 Normally, the comment period would be before
9 you turn in them in your public comment, so
10 that we can, then, take a look at them in the
11 review.

12 MS. SHISTAR: I do believe that
13 there were some listed, that there were things
14 listed in the TR, but I will have to look at
15 it.

16 CHAIR RICHARDSON: Thank you,
17 Terry.

18 MS. SHISTAR: Thanks.

19 CHAIR RICHARDSON: Okay,
20 Gwendolyn, you're up.

21 And I should say we are running a
22 half-an-hour behind. So, just to suggest we

1 keep our questions relatively short.

2 MS. WYARD: Good afternoon, Madam
3 Chair.

4 My name is Gwendolyn Wyard. I am
5 the Regulatory Director of Organic Standards
6 and Food Safety for the Organic Trade
7 Association.

8 For the record, I have an advanced
9 degree in fermentation science with a minor in
10 chemistry nutrition. I have worked full-time
11 in organic certification and policy for the
12 last 16 years. This is my 22nd consecutive
13 NOSB meeting and the first that I have had to
14 show up wearing glasses.

15 (Laughter.)

16 My comments today will focus on
17 glycerin, gellan gum, and boiler chemicals.

18 OTA supports the proposal to
19 remove synthetic glycerin from the National
20 List. It is time we agree to make this change
21 because organic glycerin is available and more
22 can be made. We understand that the supply of

1 organic glycerin today falls short of current
2 demand, and for natural flavors and "made with
3 products", organic glycerin is not required.

4 Accordingly, we also support the
5 proposal to list glycerin on 205.606 of the
6 National List as an allowed non-organic
7 agricultural substance that can be used only
8 when organic forms are not available.

9 Our concern is with the
10 classification motion that narrowly defines
11 agricultural glycerin as a product of
12 fermentation. Let's take a look at the
13 different types of glycerin that are of
14 interest to the organic sector. That is
15 actually the chart.

16 The type listed at the top starts
17 with fats and oils and uses alkali processing
18 aids such as sodium hydroxide to separate the
19 fatty acids from the glycerin. This is the
20 synthetic form that the Subcommittee is
21 proposing to remove.

22 The next three types of glycerin

1 are derived from agricultural starting
2 material and processed using biological and
3 mechanical methods. All three forms would be
4 classified as agricultural, according to
5 NOSB's adopted recommendation on
6 classification of materials and NOP's
7 corresponding Draft Guidance. All three forms
8 can also be made organically, and for all
9 three forms there are no ancillary substances
10 added. Pure glycerin is just that, pure.

11 OTA believes the proposal must
12 clearly recognize all agricultural forms of
13 glycerin. A clarification to the proposal can
14 easily be accomplished by making a minor
15 technical correction, as you see here on the
16 screen, the classification motion.

17 We don't believe this is a
18 substantive change, but, rather, a technical
19 clarification. The listing motions remain
20 unchanged. We believe the Handling
21 Subcommittee used the fermentation form as an
22 example. However, the allowed agricultural

1 forms of glycerin should be determined by the
2 NOSB's and NOP's adopted guidance on
3 classification.

4 Certifiers will be able to
5 evaluate the allowed forms of glycerin using
6 this guidance, and further specificity can be
7 provided through NOP's permitted substance
8 list for handling materials. This approach
9 will stand the test of time and respect all of
10 the good work that has been done on
11 classification of materials.

12 Gellan gum. First, I want to say
13 that OTA supports the continued allowance of
14 non-organic substances on the National List
15 only when they are essential, compatible with
16 organic principles, and cause no harm to human
17 health or to the environment.

18 In the case of gellan gum, we are
19 not aware of any organic vegetarian gum that
20 would serve as a suitable and equally-
21 functional alternative. OTA believes that it
22 is important that the Board recognize that

1 many companies voluntarily chose to remove
2 carrageenan from their products as a result of
3 the controversial discussions and information
4 that came out of its sunset review in 2012.
5 Through research and development, several
6 companies, many companies, and many more, they
7 have identified gellan gum as the acceptable
8 and suitable alternative to carrageenan. They
9 have invested into reformulating and labeling
10 their products with gellan gum, only to learn
11 now that there is an active process to remove
12 this material from the National List as well.
13 This is no way a company can live in these
14 unstable conditions.

15 We are not aware of any new
16 information that supports a conflict with OFPA
17 or the regulations. To the best of our
18 knowledge, gellan gum is essential.

19 Boiler chemicals. OTA believes
20 that all three boiler chemicals, based on our
21 initial review, are no longer essential
22 because an effective and commercially-

1 available mechanical device, a steam
2 generator, may now be used at the point at
3 which packaging sterilization is needed.

4 We do want to point out, however,
5 that this equipment is not cheap and it is
6 often most challenging for the small to
7 medium-sized food processors to adopt
8 alternative practices when there is a high
9 capital investment in new equipment involved.
10 Here is the shiny piece of equipment.

11 We make this point in
12 consideration of timelines that may be needed
13 for organic operations, particularly small
14 operations, to transition and comply with new
15 requirements.

16 Jay, John, Joe, and Wendy, thank
17 you so much for your service. We are going to
18 miss you. We can't wait to have you out in
19 the audience with us.

20 Thank you very much. It has been
21 a pleasure to provide comments here today.
22 Thank you, and thank you again, and thank you.

1 (Laughter.)

2 Thank you.

3 CHAIR RICHARDSON: It's just not
4 going to work. Sorry.

5 (Laughter.)

6 Thank you, Gwendolyn.

7 Are there any questions or
8 comments?

9 John?

10 VICE CHAIR FOSTER: Can whoever is
11 in charge of the slides kick back to the
12 glycerin table? Okay.

13 So, despite the fact, Gwendolyn,
14 that you and I at Oregon Tilth spent many
15 hours talking about glycerin many, many years
16 ago, I am foggy a little bit on some of this.
17 So, help me out.

18 So, I get the basics. So, I had
19 to write this down because I don't -- this is
20 hard for me to follow. What is the current
21 availability of glycerin from like mechanical
22 or physical methods, like steam? I know what

1 the distinction is. I just don't know what
2 the availability is. And that is not
3 something that generally comes up on their TR.
4 Do you know?

5 MS. WYARD: Right, right. Well, I
6 am going to try a little bit. I have been
7 trying to track down this information. It is
8 really difficult.

9 What we do know from the petition
10 -- and I think the petitioner is here, and
11 when he is up, he can help me out here. But
12 the petitioner, I believe that it says that
13 they are producing about 400,000 pounds
14 annually of organic glycerin. So, we know
15 that much is available in organic form, and
16 that is the glycerin that is produced through
17 microbial fermentation of the sugar substrate.

18 There is also, as you can see
19 there, there is organic glycerin available
20 that is produced through the alkali hydrolysis
21 of fats and oils. But I think part of the
22 issue that you are getting at, because I have

1 seen it in everybody's public comments --
2 well, not everybody's, but several comments
3 that were submitted -- is there is this
4 question of how much non-organic glycerin
5 would be available, agricultural forms,
6 specifically the kind that is made through
7 steam splitting through the mechanical
8 process.

9 Because I think what needs to be
10 recognized is that, if you were to limit the
11 glycerin to agricultural forms only, the kind
12 that is made through fermentation, there is no
13 non-organic glycerin available that is made
14 through fermentation. So, if you were to just
15 limit it to fermentation forms, essentially,
16 you have not given an allowance to use non-
17 organic. You would only have organic
18 available.

19 If you go with the NOP guidance,
20 NOSB-adopted classification on materials, and
21 allow all glycerin made under
22 biological/mechanical processes, that would

1 expand to other forms of glycerin,
2 specifically, the kind that is made through
3 enzymolosis, enzymatic hydrolysis, or
4 mechanical steam splitting.

5 The amount of glycerin that is on
6 demand through hydrolysis in the United States
7 if 540 million tons. The on-demand data from
8 membership for the organic sector that we have
9 been able to pull together -- and this is a
10 very low number -- is at least 1 million
11 pounds.

12 I have talked to one company that
13 makes glycerin through the mechanical steam
14 splitting method that can supply 38 million
15 pounds of pure glycerin. That is one company,
16 and I know there's many more. So, 540 million
17 is the demand with hydrolysis. One company is
18 making 38. Thirty-eight divided by 540 is 7
19 percent. We make up 3 percent of the market,
20 1 percent worldwide. I think that there is
21 enough glycerin available to satisfy the needs
22 of the flavor industry, the "made with"

1 category, and then, the organic, we need to
2 grow that.

3 That was a long answer, but --

4 VICE CHAIR FOSTER: No, it helped,
5 and the glasses are great.

6 MS. WYARD: Thank you.

7 VICE CHAIR FOSTER: Go with them.
8 Stay with them.

9 MS. WYARD: The style?

10 (Laughter.)

11 CHAIR RICHARDSON: That was very
12 helpful, actually, Gwendolyn. Yes, appreciate
13 it.

14 Tracy?

15 MEMBER FAVRE: Not so much a
16 question as a comment. I did want to clarify
17 that we did actually mean the current proposal
18 listing, classification listing, as an
19 example, not to be inclusive, but I think we
20 all realize from the consternation expressed
21 in the public comments that we were not
22 particularly clear about that. So, thank you.

1 MS. WYARD: Okay, great. Thank
2 you.

3 CHAIR RICHARDSON: Harold?

4 MEMBER AUSTIN: Thanks, Jean.

5 Gwen, you're okay because, you
6 know, give it a little bit more time, a couple
7 more years, and then, you will have to have
8 glasses so you can read what you have written
9 down. And then, you are going to have glasses
10 so you can see. So, you have got a ways to go
11 yet.

12 MS. WYARD: Keep watching. I'll
13 be here.

14 (Laughter.)

15 MEMBER AUSTIN: In your
16 presentation in gellan gum and, then, also
17 looking through your guys' submitted written
18 comments and several of the others, it brings
19 us to an interesting point. My first meeting
20 on this Board we got to deal with the issue
21 around carrageenan.

22 And one of the things that came

1 out of that meeting was the industry
2 stakeholders, the handlers, were tasked with
3 working to find a solution to replace
4 carrageenan out of that.

5 And listening to your comments and
6 the information that you have provided, plus
7 some of the other written public commentary
8 that we have gotten back, it does look like
9 the organic handlers and the stakeholders have
10 begun to move away from carrageenan very
11 aggressively over to gellan gum.

12 But also looking through some of
13 the comments, there is a concern that has been
14 raised around the status of gellan gum around
15 GMOs. And I guess my question would be, at
16 the certifier level, how or should that be
17 dealt with? Is there a process or is there
18 inspections in place that could help to answer
19 and deal with those types of concerns that
20 have been raised as far as the GMO and the
21 status of gellan gum goes?

22 MS. WYARD: Thanks, Harold. I

1 appreciate that question.

2 Yes, there is definitely a process
3 in place. Any material on the National List
4 must be produced without the use of excluded
5 methods. So, you cannot use gellan gum that
6 has been produced through genetic engineering.
7 You cannot use that in an NOP-certified
8 product.

9 And I invite any certifier in this
10 room to back me up on this, but the normal
11 process that has been in place since the
12 implementation of the NOP and prior is that
13 every ingredient on the National List is part
14 of the review process, whether it is a
15 certifier or a material review organization.
16 They check the GMO status. So, they are going
17 to ask questions. It doesn't take an NOSB
18 recommendation or an annotation to flag the
19 review of the GMO status of an ingredient.

20 And they are going to have
21 informed staff that are going to know the
22 right questions to ask. If it is made through

1 fermentation, they are going to know to ask
2 whether the microorganism has been genetically
3 modified.

4 Just like if we take enzymes, for
5 example, one of the successes in the biotech
6 industry, not a success from our side, but
7 enzymes are often produced from genetically-
8 modified organisms. Enzymes are on the
9 National List. We do not allow any enzymes
10 that have been produced from a genetically-
11 modified organism.

12 If genetically-modified gellan gum
13 were the only form of gellan gum available in
14 the world and it sat there on the National
15 List, that does not give a license for that to
16 be used. Certifiers could only allow a non-
17 GMO form.

18 So, it is at the certifier level,
19 at the MRO level, that that analysis is done.
20 So, I think that the possibility that there
21 might be a genetically-modified gellan gum --
22 and I am going to let Cheryl from CP Kelco

1 speak to the status in detail, but I think at
2 this level of review, I think that you have to
3 trust that the certifiers and the MROs are
4 going to make those determinations and not
5 allow it if it is GMO.

6 CHAIR RICHARDSON: Thank you.

7 MS. WYARD: Thank you very much.

8 CHAIR RICHARDSON: Any other
9 questions?

10 (No response.)

11 Okay, thanks very much, Gwendolyn.

12 MS. WYARD: Thank you.

13 CHAIR RICHARDSON: Let's move on
14 now to Star Maule, and on deck we have Johanna
15 Mirenda.

16 And again, I remind you we are
17 running about half-an-hour behind time now.

18 MS. MAULE: Good afternoon.

19 My name is Star Maule, and I work
20 as a Certification Specialist at Organic
21 Valley Crop Cooperative.

22 And I thank you for the

1 opportunity to provide public comment.

2 We understand that the NOSB's
3 agenda did not allow for consideration of
4 acidified sodium chloride, or ASC, for
5 livestock as a teat dip at this meeting.
6 However, we as a cooperative of 1,450
7 certified organic dairy producers would like
8 to express our support of ASC.

9 We feel ASC is necessary as an
10 ingredient, used as a topical
11 disinfectant/sanitizer, and specifically, for
12 pre- and post-livestock udder preventative
13 treatment.

14 ASC is already approved in
15 handling and is applied to the surface of
16 fresh and processed foods, including meats,
17 fruits, vegetables, freshwater fish, and
18 seafood.

19 Studies show that ASC solutions
20 have superior antimicrobial activity against
21 E. Coli and preventing infection, including
22 mastitis.

1 When used as petitioned, ASC and
2 its components show minimal likelihood of
3 persistence or accumulation in the
4 environment.

5 It is reported that there are
6 homemade alternatives available for teat dips
7 made with ingredients like lavender essential
8 oil, vinegar, tea tree oil, and organic acids.
9 However, there are no studies proving the
10 effectiveness of such alternatives.

11 Current alternatives available for
12 teat dips in organic livestock production are
13 limited. Additional tools to keep cows
14 healthy and not needing antibiotics would be
15 advantageous.

16 ASC is effective and
17 environmentally-friendly as it breaks down to
18 water, citric acid, and salt after use.

19 In conclusion, acidified sodium
20 chloride has no adverse impacts on humans or
21 the environment. ASC is compatible with
22 organic production practices, and it is

1 essential for organic production because it
2 has been proven effective, and producers
3 should not be limited on acceptable
4 alternatives to maintain herd health.

5 Having another eco-friendly
6 alternative in their toolbox will help
7 producers avoid resorting to the use of
8 chlorhexidine.

9 Thank you for all of your time and
10 hard work on the National Organic Standards
11 Board.

12 CHAIR RICHARDSON: Thank you,
13 Star.

14 Questions? Comments?

15 Joe?

16 MEMBER DICKSON: Thank you, Star.

17 So, ASC isn't currently on the
18 National List. So, if it were added to the
19 list, would its allowance replace other
20 materials now in use that are less preferable?

21 MS. MAULE: There are not a lot of
22 alternatives there, and a farmer can only use

1 chlorhexidine if all other treatments have
2 failed. So, we feel it would be better for
3 the farmers if they had more alternatives that
4 are acceptable in organic production.

5 CHAIR RICHARDSON: Any other
6 questions?

7 (No response.)

8 Excellent. Thanks very much,
9 Star.

10 MS. MAULE: Thank you.

11 CHAIR RICHARDSON: We have Johanna
12 Mirenda up now, and Randy Mitchell on standby.

13 MS. MIRENDA: Hi, everyone. I'm
14 Johanna Mirenda, Policy Director for
15 Pennsylvania Certified Organic, a USDA-
16 accredited, certified agency operating within
17 the Mid-Atlantic Region and certifying
18 approximately 700 organic operations.

19 I would like to use this brief
20 opportunity to comment on the work of the
21 National Organic Standards Board and the
22 National Organic Program, and highlight the

1 types of outcomes that have enhanced the
2 integrity and consistency of our certified
3 organic process.

4 As a certifier, the work of our
5 agency is heavily reliant on clear regulatory
6 expectations from the Board and the program.
7 We work closely with hundreds of individual
8 farmers and handlers of all types and sizes,
9 each with their own background, management
10 systems, and business priorities.

11 Our unique juxtaposition between
12 the regulatory bodies and the certificate-
13 holders allows us to observe on a daily basis
14 how the recommendations from the Board, and
15 ultimately the requirements from the program,
16 affect each operation.

17 We have found success in
18 implementing thoughtful and factually-
19 supported regulatory requirements that align
20 with the core values of sustainability,
21 allowing for growth of the industry, and
22 appeal to the diversity of farmers and food

1 manufacturers.

2 Our experience has shown that,
3 regardless of the differences among our
4 clients, our colleagues within organic
5 certification, or among the greater organic
6 community of consumers and advocates that want
7 to see organic succeed as an industry, we all
8 have several key values in common. We all
9 want clear and fair regulations, a strong and
10 consistent enforcement system, and a
11 transparent process with public participation.

12 We appreciate the recent
13 contributions from the program that uphold
14 these values, particularly through the
15 instructions, guidances, and policy memos that
16 have been incorporated into the Program
17 Handbook. These publications have made
18 significant improvements to the clarity and
19 consistency of the certifier review process
20 and compliance procedure, creating a fair
21 playing field for certifiers and certificate-
22 holder across the country and the globe.

1 We also appreciate the Board for
2 increasingly thorough recommendations and
3 detailed technical reviews. Your recent
4 sunset material summaries will be an
5 invaluable reference during our future
6 material reviews, when certifiers will
7 inevitably ask ourselves, just what exactly
8 did the NOSB cover in their review back then?

9 This type of work by the NOSB and
10 the NOP is making organic certification
11 stronger by being more enforceable,
12 consistent, and transparent. These are values
13 that our agency upholds and seeks to
14 continuously improve with every new season,
15 new client, or new issue.

16 As a sort of regulatory
17 gatekeeper, the Board is faced with the
18 exceptional challenge of ensuring that the
19 integrity of organic agriculture is maintained
20 as the organic industry expands. And being
21 that the industry is at 35 billion and
22 growing, this is quite a timely issue.

1 To that end, we acknowledge that
2 there is always more to do to develop and to
3 reassess in an ever-changing environment.
4 Your work plans are long and the sunset
5 reviews are limitless, but your sound and
6 sensible efforts to uphold our common values
7 of diversity, sustainability, and integrity
8 are appreciated.

9 Thank you.

10 CHAIR RICHARDSON: Thank you,
11 Johanna.

12 Questions? Comments?

13 (No response.)

14 Thank you very much.

15 The next speaker is Randy
16 Mitchell, and on standby is Brad Alstrom.

17 MR. MITCHELL: Okay, as Michelle
18 pulls up my slides here, my name is Randy
19 Mitchell. I'm with Coleman Natural Foods and
20 speaking to you today on behalf of the
21 Methionine Task Force specifically on high-
22 protein corn and organic poultry diets. I am

1 a practicing poultry nutritionist with 20
2 years of experience in commercial and organic
3 broilers and other poultry, turkeys, et
4 cetera.

5 I wanted to, again, just touch
6 base on the problem with methionine in organic
7 poultry diets. Methionine and cystine and
8 available organic feed ingredients are
9 inadequate to meet the essential needs for
10 poultry. Therefore, synthetic methionine is
11 needed in organic broiler diets today.
12 However, it is the stated desire of the NOP
13 and the Methionine Task Force to eventually
14 remove synthetic methionine, as more natural
15 alternatives are available.

16 High-protein corn, aka high-
17 methionine corn, has been proposed as a
18 solution to the synthetic methionine question.
19 And as we look at the nutrient composition of
20 high-methionine corn or high-protein corn, you
21 can see that the conventional corn, on the
22 left, has got fairly low protein compared to

1 the two types of high-protein corn and, yes,
2 the methionine level is much higher. But, if
3 you look at it as a percent of protein, the
4 methionine is really not that much higher.
5 And if you look at what is really important
6 from a nutritional standpoint, the methionine
7 plus cystine as a percent of protein is no
8 higher than conventional corn. That is very
9 important from a nutrient formulation
10 standpoint when we are looking at organic
11 diets.

12 The other issue with high-protein
13 corn is the yield. There is a severe yield
14 disadvantage compared to many of the top-
15 yielding non-GMO varieties grown by organic
16 farmers today. Past experience for me and
17 other grain companies says that farmers are
18 not willing to take those losses, sacrifice
19 yield.

20 I have been involved with two
21 specialty grain crops in my career that I was
22 very excited about, trying to push through

1 performance to grow, and they have been
2 unsuccessful because of a number of these
3 issues here that are listed: identity
4 preservation, but one of the big ones is how
5 to incentivize farmers to grow this corn. It
6 is very difficult with a yield loss.

7 However, just in summary, high-
8 protein corn would be a valuable ingredient
9 for poultry nutrition as formulated in organic
10 diets. However, when we formulate 100 percent
11 of the corn as this high-protein corn, it is
12 not a total solution for this synthetic
13 methionine, especially in young broiler diets
14 where the methionine level is the highest and
15 the corn content is the lowest.

16 And even if it is available, the
17 widespread adoption of high-protein corn by
18 organic corn farmers is very unlikely because
19 of the loss in yield.

20 Thank you.

21 CHAIR RICHARDSON: Thank you very
22 much.

1 Questions?

2 Tracy?

3 MEMBER FAVRE: So, do you have a
4 suggested alternative?

5 MR. MITCHELL: A suggested
6 alternative for synthetic methionine?

7 MEMBER FAVRE: Yes. If the high-
8 methionine corn is not going to be the silver
9 bullet, are there other things out there that
10 might work for us instead?

11 MR. MITCHELL: Well, there are a
12 number of ingredients that have been
13 identified that could help with this problem.
14 But the availability of them in organic form
15 is essentially unavailable.

16 Corn gluten meal, it was mentioned
17 earlier about the 5 percent of non-organic
18 ingredients that are used in Europe. Corn
19 gluten meal, potato meal, those are the non-
20 organic ingredients used in Europe for those
21 purposes because they are high in methionine.
22 There is no organic corn gluten meal. It just

1 doesn't exist.

2 So, it is not that some
3 ingredients aren't available. It is they are
4 not available in adequate quantities in an
5 organic form.

6 And it is a very complex question
7 because, even if some things are available,
8 getting them in an organic form is very
9 difficult, and how to incentivize that when
10 the market for organic feed is fairly small.

11 CHAIR RICHARDSON: Nick?

12 MEMBER MARAVELL: Thank you for
13 your presentation. Very informative.

14 Could we go back to the slide that
15 shows the chart of the mix of the proteins in
16 the different types of corn?

17 MR. MITCHELL: Sure.

18 MEMBER MARAVELL: And I guess I
19 just need to understand that chart a little
20 bit better, not being a nutritionist, but
21 being a poultry producer and a corn grower and
22 a corn seed grower as well.

1 The protein that you have under
2 the conventional is at about 9.5 percent, I
3 assume by dry matter?

4 MR. MITCHELL: That is on a dry-
5 matter basis, correct.

6 MEMBER MARAVELL: Yes.

7 MR. MITCHELL: Yes.

8 MEMBER MARAVELL: And what you are
9 seeing is that the hard endosperm corn is
10 going to have a slightly-higher protein than
11 the soft endosperm, but those are high-protein
12 corns. And those are also corns that are
13 probably more similar to what was found when
14 we discovered corn in America. The
15 composition of the protein in the older
16 varieties was generally higher. And corn,
17 when it was bred, except for certain varieties
18 which were flour corns, are being bred now for
19 their carbon or for their starch or for the
20 soft endosperm.

21 MR. MITCHELL: Exactly.

22 MEMBER MARAVELL: Yes. So, I

1 guess what I am saying is, when you have the
2 percentage of methionine, that percentage of
3 methionine is roughly 50-percent higher in the
4 high-protein corns. Would that be a fair
5 statement, that the percentage of methionine
6 is higher in the high-protein corn?

7 MR. MITCHELL: Yes, the percentage
8 of methionine is higher. I certainly don't
9 want to give the impression that I wouldn't
10 like to have this ingredient today. I would
11 love to have it to formulate organic diets
12 with. It would help us. It would reduce our
13 protein levels in our starter feeds probably
14 by, I would say, a percent, maybe a percent
15 and a half, which would help with some of the
16 mortality issues that we saw earlier.

17 However, we would still require the two pounds
18 of methionine to meet the total sulfur, the
19 methionine requirement of the bird.

20 MEMBER MARAVELL: You're saying
21 you would still require the synthetic
22 methionine?

1 MR. MITCHELL: Yes. Yes, in order
2 to meet that requirement, yes.

3 MEMBER MARAVELL: Right. Well,
4 the amount of protein in a bushel of corn
5 under the high-protein is going to be higher.

6 MR. MITCHELL: Correct.

7 MEMBER MARAVELL: And so, the
8 absolute amount of methionine is going to be
9 higher in that bushel, is that correct?

10 MR. MITCHELL: That would be
11 correct.

12 MEMBER MARAVELL: So, I guess
13 where I am going with this is, well, let me go
14 down to the methionine and cystine mix as
15 well. There, actually, it appears that there
16 isn't any difference in the methionine plus
17 the cystine mix as a percentage of total
18 protein.

19 MR. MITCHELL: That's correct.

20 MEMBER MARAVELL: So, the mix, the
21 balance is the same, but the total amount of
22 protein per kernel or per bushel is higher?

1 MR. MITCHELL: Yes, that's right.

2 MEMBER MARAVELL: Okay.

3 MR. MITCHELL: And how that would
4 help in a way is we would be able to feed a
5 little bit less soybean meal, a little bit
6 more corn.

7 MEMBER MARAVELL: Right.

8 MR. MITCHELL: And so, the total
9 amount of protein in a starter diet, for
10 example, would be able to come down, which
11 would help somewhat with some of the
12 conditions we have for birds today.

13 MEMBER MARAVELL: Right. So, I
14 guess the cost issue, then, is one of, well,
15 how much is a bushel of corn worth? And what
16 we are seeing here -- and maybe this is
17 somewhat of an educational process -- is that
18 not all corn might not have the same
19 nutritional profile, if you will.

20 MR. MITCHELL: Correct.

21 MEMBER MARAVELL: Perhaps some
22 corn should cost more. But let me just go on

1 and say, if the yield is less but it costs a
2 little bit more, but it is yielding higher
3 protein, it may have some value.

4 So, as a corn grower and as a corn
5 seed grower, I would love to produce -- and,
6 actually, I do produce -- some corns with
7 higher protein profiles. But I would love to
8 produce a variety that would be -- and I am
9 also a poultry feed producer as well. We also
10 grind our own poultry and sell poultry feed.
11 I would love to have the ability to put high-
12 protein corn into production and sell it into
13 the market, put it into the feed.

14 And I am looking at your chart
15 there, and I am saying I think it has some
16 ability to provide a solution here. It may
17 not be the total solution, but I think that
18 the corn could be valuable and could warrant
19 a premium because it has a different
20 nutritional profile.

21 So, I am just trying to bounce
22 that off of you because you're much more into

1 the business than, indeed, I am.

2 MR. MITCHELL: Right. And I would
3 agree with you that it would, in a situation
4 like yours where you are growing your own
5 corn, you are contracting the acres, you can
6 identity-preserve it, it would be a great
7 scenario.

8 However, when it goes into
9 commerce and you have all the extra expense,
10 so when you are looking at it from a total
11 market standpoint, it makes it very difficult
12 from a logistic standpoint, unless it were to
13 replace all of the corn out there, which is
14 not practical.

15 MEMBER MARAVELL: Right.

16 CHAIR RICHARDSON: Thank you very
17 much.

18 Oh, I'm sorry.

19 MEMBER FAVRE: I'm sorry, I had
20 one more quick question.

21 CHAIR RICHARDSON: Tracy has a
22 question. I'm sorry.

1 MEMBER FAVRE: We had asked Mr.
2 Leventini previously about the step-downs that
3 were proposed in the previous recommendation
4 for methionine.

5 MR. MITCHELL: Uh-hum.

6 MEMBER FAVRE: And he basically
7 deferred to you and said that you might have
8 some insight as to how those step-down numbers
9 were reached, if you were on the Methionine
10 Task Force at that time.

11 MR. MITCHELL: I wasn't on the
12 Methionine Task Force at that time, and I can
13 tell you there was no science used to come up
14 with those numbers.

15 MEMBER FAVRE: Okay.

16 MR. MITCHELL: I mean, I don't
17 know who --

18 MEMBER FAVRE: Arbitrary?

19 MR. MITCHELL: -- came up with
20 them, but --

21 MEMBER FAVRE: But you feel it was
22 an arbitrary number that was reached?

1 MR. MITCHELL: It was an arbitrary
2 number. For broilers, I know specifically.
3 I mean, I am a turkey nutritionist as well,
4 and the requirement for turkeys is at three
5 pounds, as an example, and broilers are at two
6 pounds. And the actual requirement or the
7 allowed for turkeys is three pounds and for
8 broilers two pounds. And the actual
9 methionine requirement for turkeys, it is not
10 that much higher for broilers.

11 So, how they came up with those
12 numbers I have no idea. And so, it puts
13 broilers at a much more disadvantage because
14 they spend such a large portion of their life
15 in the highest methionine requirement time
16 period, which is usually in the first three to
17 four weeks.

18 CHAIR RICHARDSON: Calvin?

19 MEMBER WALKER: It is good to have
20 a poultry nutritionist. We could use them at
21 Southern University A&M College.

22 The question I asked the gentleman

1 before, the petition mentioned the term, the
2 methionine step-down was "marginally
3 adequate".

4 MR. MITCHELL: Right.

5 MEMBER WALKER: As a nutritionist,
6 could you explain that definition?

7 MR. MITCHELL: Well, I am not sure
8 if this will fit into Webster's or not, but
9 when I would hear that term right there, what
10 I would think of, if something is marginally
11 adequate, would be where a good portion of the
12 flocks that you would grow would not show any
13 clinical symptoms, but you may have 20-30
14 percent that would either show subclinical or
15 clinical symptoms.

16 So, if you look at one individual
17 flock, you may say, well, this flock is fine.
18 So, if we judge everything we do based on this
19 one flock, you will be okay. And that is one
20 problem we get even in the university small
21 pen studies. It is that there is so much
22 variation in disease challenges, just

1 variation in crops that can occur, that if you
2 look at one individual study, it will say, oh,
3 with this level of methionine, it is fine.
4 When you get out in the field and you have a
5 lot of variation factors, that there will be
6 a certain number of flocks -- it may be 10; it
7 may be 20 percent -- that you will have
8 clinical symptoms of deficiencies, and the
9 other 80 percent may be fine.

10 So, does that help? Okay.

11 CHAIR RICHARDSON: I have two more
12 questions on this topic before we close it
13 off. First, Mac, and then, Tracy.

14 MEMBER STONE: So, we talk about
15 two pounds of synthetic methionine per ton.
16 How many pounds of methionine are in that ton,
17 natural pounds, are in that ton of feed with
18 typical feedstuffs?

19 MR. MITCHELL: okay. With typical
20 feedstuffs, two pounds of methionine are .1
21 percent. So, you would have about 14 pounds,
22 if I am doing the math right. No, actually,

1 that is total methionine plus cystine would be
2 about 14. It would be about .7 percent, if I
3 am doing that math right. Out of 2,000
4 pounds, it would be -- is that 14 pounds? I
5 believe so.

6 MEMBER STONE: Okay, thanks.

7 MR. MITCHELL: Okay.

8 CHAIR RICHARDSON: Tracy?

9 MEMBER FAVRE: Okay, my very last
10 brief question would be, how long would you
11 surmise it would take to bring a product like
12 a high-methionine corn to market? This may be
13 beyond your expertise. But, in your
14 experience, what does it really take to take
15 a product from sort of a developmental grow-
16 out stage to where we get to full commercial
17 availability timeline-wise?

18 MR. MITCHELL: Well, I met with
19 Pioneer -- it was from DuPont; it was one of
20 the largest seed companies in the world --
21 probably less than two months ago, probably
22 six weeks ago. And we were there specifically

1 looking at their non-GMO varieties that they
2 had, that they are working on how to improve.
3 And they are looking at a timeline from when
4 they start developing to marketing of 10-plus
5 years.

6 And not only is that a case, it is
7 really the adoption in the marketplace. As I
8 mentioned, I have had two experiences in my
9 career with specialty corns, which I was very
10 excited about, and they offered a lot of value
11 to an end-user, as the high-methionine corn
12 would to an organic user.

13 And it is literally going out and
14 convincing the grower why they should grow
15 this corn, because they have a choice about
16 what to do. And if you say, "Well, this is
17 the only corn I want to buy," then they can go
18 plant something else, and they will. I mean,
19 we have seen that time after time. They will
20 not take a loss in yield that is going to
21 reduce their income per acre. So, it is an
22 arduous task, yes.

1 CHAIR RICHARDSON: Thank you very
2 much, Randy. That was very helpful.

3 The next speaker is Brad Alstrom,
4 with Patrick Kerrigan on deck.

5 MR. ALSTROM: Hello. My name is
6 Brad Alstrom. I am an organic foods retailer
7 from Paoli, Indiana. I am testifying on
8 behalf of Cornucopia Institute today.

9 I work with a grocery co-op in
10 Bloomington, Indiana, called Blooming Foods.
11 Bloomington is a town of about 80,000 people,
12 home to Indiana University. Our co-op is
13 owned by 12,000 consumer members and employs
14 over 300 people at five locations. We are a
15 significant player in our Bloomington, Indiana
16 grocery market and, also, part of a larger
17 national association of grocery co-ops with
18 combined retail sales of over \$1.6 billion.

19 My work at Blooming Foods is as a
20 Regional Development Coordinator. I work to
21 support growing and emerging food co-ops in
22 our greater Indiana region.

1 Blooming Foods sells a large
2 variety of grocery products, including organic
3 to conventional, from local to specialty. Our
4 emphasis is on fresh foods, including produce,
5 meats, dairy, and freshly-prepared deli foods.

6 A large percentage of the products
7 that Blooming Foods carries are certified
8 organic. And as these organic foods, and the
9 integrity thereof, that is the primary point
10 of differentiation for our business and it is
11 what member/owners and customers look for.
12 They expect Blooming Foods to carry products
13 with ingredients they can trust.

14 Blooming Foods has been a long-
15 time supporter of the Cornucopia Institute in
16 its efforts to protect the integrity of USDA
17 organic standards. I am here today as a
18 citizen lobbyist, and I am volunteering
19 testimony because I want to help ensure the
20 integrity of organic foods.

21 I would like to comment today on
22 the 2016 sunset of a farm input called ferric

1 phosphate as an allowed synthetic on the
2 National List. Ferric phosphate is used as
3 slug and snail bait.

4 The Cornucopia Institute
5 recommends the removal of ferric phosphate
6 from the National List based on independent
7 research that demonstrates its use as a slug
8 and snail bait is only effective with the
9 addition of a chelating agent, such as EDTA.

10 EDTA, present in all slug and
11 snail baits in the U.S., is toxic to soil
12 microorganisms and its non-target species,
13 including earthworms and plants, and can
14 contribute to groundwater contamination. It
15 is persistent in the environment and has
16 concerns for human health and calcium
17 absorption. Its addition to the National List
18 is unlikely.

19 In 2007, the NOSB Crops
20 Subcommittee voted to reject the petition to
21 include sodium ferric hydroxy-EDTA on the
22 National List as a slug or snail bait because

1 of the potential for EDTA to be harmful to the
2 environment.

3 In 2009, ferric phosphate was
4 petitioned to be removed from the National
5 List under the argument that it is ineffective
6 without EDTA. The Crops Subcommittee voted to
7 keep ferric phosphate on the National List
8 under the view that the generic added active
9 ingredient needs to be considered separately
10 from any other ingredients.

11 There's little scientific evidence
12 that the generic active ingredient ferric
13 phosphate is effective without the addition of
14 a chelating agent. Chelating agents are slow
15 to degrade and are known to have a negative
16 effective on soil, microbial communities, as
17 well as lower yields in some crops. Chelating
18 agents also have the potential to pollute
19 groundwater by leaching metals from soils.

20 Having a material on the National
21 List that is only effective and available
22 commercially with a supposedly-inert substance

1 that does not meet the requirements of OFPA
2 only creates confusion.

3 In conclusion, the Cornucopia
4 Institute opposed the relisting of ferric
5 phosphate because it is not effective without
6 chelating agents that have known negative
7 impacts to human health and the environment.

8 Personally, having lived in the
9 Pacific Northwest also for a number of years,
10 where slugs are rampant and grow to rather
11 enormous sizes, I found that beer, and organic
12 beer, in particular, makes a perfectly-
13 suitable slug bait. But that is my own
14 personal experience.

15 On behalf of Cornucopia Institute,
16 I want to thank you for allowing me to present
17 testimony. If you have questions about this
18 testimony, I encourage you to speak with one
19 of Cornucopia's staff members present here at
20 the meeting.

21 Thank you.

22 CHAIR RICHARDSON: Thank you very

1 much.

2 The next speaker is Patrick
3 Kerrigan, and on deck is Cheryl Van Dyne.

4 MR. KERRIGAN: Hi. Is Michelle
5 here? Oh, you are Michelle? Okay. Michelle,
6 here's our comments to the NOSB on vaccines
7 that are used. Thanks.

8 Hello. My name is Pat Kerrigan.
9 I am Retail Education Coordinator for the
10 Organic Consumers Association, which
11 represents 2 million North American members
12 and readers in safeguarding organic standards.

13 Coordinating OCA's GMO-Free
14 Groceries Contest and Best Practices Online
15 Toolkit, I have learned that co-op and natural
16 food customers across the country are told by
17 their groceries that, if they want to be
18 certain to avoid GMOs, they should look for
19 the USDA organic seal.

20 The glaring exception to this
21 industry-wide recommendation is the
22 administration of GMO vaccines to organic

1 livestock. The National Organic Program knows
2 and has admitted that genetically-engineered
3 vaccines are being used. Yet, to date, not
4 one GMO vaccine has been submitted for review
5 to the National Organic Standards Board, as
6 required by law.

7 Consumers pay a significant
8 premium for the added value that they assign
9 to organically-produced livestock products.
10 Allowing unapproved vaccines developed from
11 excluded methods to be given to organic
12 livestock is a serious violation of the
13 organic rules and a betrayal of the public's
14 trust in the integrity of organic.

15 Knowing that the organic meats and
16 dairy products that they purchase are coming
17 from animals vaccinated with unapproved GMO
18 vaccines seriously damages consumers' trust in
19 these products and in the organic seal itself.

20 GMO vaccines are inherently
21 unpredictable and possibly dangerous.
22 According to a review of the risks prepared

1 for the NOSB's own Technical Advisory Panel,
2 quote, "The non-pathogenic strain present in
3 the vaccine may mutate or combine with other
4 strains to become pathogenic after
5 administration."

6 With bacterial GMO vaccines, which
7 are primarily administered via the mouth,
8 there are concerns that engineered bacteria
9 may recombine with natural bacterial in the
10 gastrointestinal tract, shed DNA in the
11 animal's feces and other secretions, could
12 potentially infect other animals, and spread
13 the virus or bacteria, or recombine with
14 naturally-occurring viruses, forming altered
15 virus strains with unpredictable
16 characteristics.

17 It is time for the NOSB to assert
18 its authority to review, regulate, and when
19 appropriate, prohibit genetically-engineered
20 vaccines. The NOSB should tell the NOP to
21 enforce the law and get GMO vaccines, none of
22 which have been reviewed or approved, out of

1 organic.

2 And it is time for the NOP to
3 require that every vaccine used in organic be
4 petitioned for review. So that the NOSB, with
5 the help of the Technical Advisory Panel, can
6 determine which ones have been genetically
7 engineered and, of those, which, if any,
8 should be allowed in organic production.

9 The work of the Livestock
10 Committee is much appreciated, and its
11 recommendations should be passed and
12 implemented by the NOP. But please don't stop
13 there. What is really needed is the
14 recommendation from the NOSB directing the NOP
15 to inform the manufacturers of the
16 approximately 73 registered animal vaccines
17 that, if they want their vaccines to continue
18 to be used in organic, they submit petitions
19 to the NOSB seeking their approval.

20 The problem of GMO vaccines
21 illegally being used in organic cannot
22 continue to be a game of hot potato between

1 the NOP and the NOSB. At some point the
2 vaccine manufacturers have to be held
3 accountable to the law.

4 And then, please be respectful of
5 the decades of work that organic farmers,
6 retailers, and other early pioneers have
7 invested into developing the strong organic
8 standards that organic consumers believe and
9 put their trust in, making organic the long-
10 time food industry leader in sales growth,
11 currently more than \$35 billion per year.

12 The cornerstone for organic
13 agriculture is continually building the
14 quality of the soil. The cornerstone for the
15 NOSB's work should be continually building
16 stronger organic standards that improve the
17 integrity of the organic seal by reducing the
18 number of synthetics allowed in organic,
19 rather than increasing them.

20 Thank you so much for your
21 service. Thank you for your time.

22 CHAIR RICHARDSON: Thank you.

1 Questions?

2 Calvin?

3 MEMBER WALKER: There is another
4 part of your sentence you didn't finish?

5 MR. KERRIGAN: There's another
6 sentence, but, I mean, I could read it. I
7 don't want to take people's time, you know.
8 But I'll give you a copy, though.

9 CHAIR RICHARDSON: Questions?

10 (No response.)

11 Thank you very much.

12 MR. KERRIGAN: All right. Thank
13 you.

14 CHAIR RICHARDSON: The next
15 speaker will be Cheryl Van Dyne, followed by
16 Zareb Herman.

17 And I should comment here that we
18 are running quite a long way behind. So, if
19 instead of taking a full 15-minute break,
20 which might go later, I would ask that you
21 just go out and come back as you need to. And
22 members of the Board have a list of who is

1 going to be speaking in what order. So, if
2 you know you are going to be asking questions,
3 just go out and come back.

4 Thanks.

5 MS. VAN DYNE: Okay, thank you
6 very much, and thank you for the opportunity
7 to present public comments.

8 My name is Cheryl Van Dyne. I am
9 the Director of Global Regulatory Affairs for
10 CP Kelco. CP Kelco is the original petitioner
11 of gellan gum, 205.605(a), gellan gum, non-
12 synthetic, and we are presenting additional
13 comments in support of the essentiality of
14 gellan gum during this sunset process.

15 CP Kelco has provided relevant
16 data and information to demonstrate that
17 gellan gum is not harmful to health, human
18 health, or the environment; necessary to the
19 production of agricultural products because of
20 the unavailability of holding on synthetic
21 substitute products and consistent with
22 organic handling.

1 Gellan gum is not harmful to human
2 health, and some data to support that is the
3 TAP report for gellan gum with no adverse
4 findings. Gellan has global approval as a
5 food additive, and including JECFA, which is
6 the WHO, World Health Organization, and the
7 U.S. FDA, as a food additive. And there are
8 no environmental impacts from the manufacture,
9 use, or disposal of gellan gum.

10 Gellan gum is unique, and it
11 provides the organic industry with essential
12 properties that are needed to formulate
13 beverage and food products for delivery of
14 healthy organic choices to consumers. Without
15 gellan gum, producers of organic fortified
16 beverages cannot provide consumer assurance of
17 consistent delivery of vitamins, minerals, or
18 other important nutrients. And gellan gum has
19 the unique ability to send these nutrients
20 versus other gums on the National List or
21 available as organic.

22 This slide is a process flow, and

1 it is to address the gellan gum that is
2 offered to the organic community by CP Kelco.
3 It is from a pure non-GMO culture of
4 sphingomonas elodea. During the fermentation
5 or growth, which is a multiplication of the
6 cell process, the sphingomonas elodea bacteria
7 metabolizes a broth of non-GMO nutrient media.
8 It is during this process that the organism
9 produces the water-soluble, high-molecular-
10 weight polysaccharide or gum.

11 At the end of the growth cycle,
12 heat is applied and a processing aid,
13 isopropyl alcohol, is used to separate the
14 polysaccharide or gum from the broth. The
15 spent cells, water, and IPA are separated from
16 the gellan gum, which is then dried and
17 milled. And IPA is a residual from
18 manufacturing and does not chemically alter
19 the gellan gum.

20 Gellan gum, high-acyl gellan gum
21 is consistent with organic handling, and CP
22 Kelco respectfully requests the NOSB preserve

1 this listing for the organic community at
2 large, both producers and consumers.

3 CHAIR RICHARDSON: Thank you,
4 Cheryl.

5 Questions?

6 Zea?

7 MEMBER SONNABEND: Thank you.

8 As you may or may not know, we
9 have started a procedure and handling
10 processes to assess what we are referring to
11 as ancillary substances --

12 MS. VAN DYNE: Uh-hum.

13 MEMBER SONNABEND: -- better known
14 by you probably as incidental additives.

15 Does your gellan gum contain any
16 ancillary substances?

17 MS. VAN DYNE: No. As a
18 polysaccharide, it is pure gellan gum. And
19 the products that CP Kelco offers,
20 particularly to the organic industry, there is
21 a pure version and, then, there is a version
22 that is sugar. So, there are no ancillary

1 substances.

2 CHAIR RICHARDSON: Jay?

3 MEMBER FELDMAN: Maybe this is
4 best addressed to the Subcommittee. But have
5 you provided the manufacturing processes to
6 the NOSB? You're the original petitioner as
7 well, right, 2004?

8 MS. VAN DYNE: I'm sorry, I'm not
9 understanding what you're asking.

10 MEMBER FELDMAN: Well, I am
11 wondering if this Board has information on the
12 manufacturing processes that you all use in
13 producing the gellan gum.

14 MS. VAN DYNE: Okay. I guess I
15 still am not understanding. This is the
16 manufacturing process.

17 MEMBER FELDMAN: Right.

18 MS. VAN DYNE: As I went through,
19 I don't know if you saw the slide deck.

20 MEMBER FELDMAN: Right. So, does
21 the petition itself, the original petition --

22 MS. VAN DYNE: Uh-hum.

1 MEMBER FELDMAN: -- have the
2 manufacturing process in it?

3 MS. VAN DYNE: Yes, it did.

4 MEMBER FELDMAN: Okay. Thank you.

5 MS. VAN DYNE: Thank you.

6 MEMBER DICKSON: Some of the
7 written commenters for this meeting raised a
8 question as to whether the microorganism
9 itself was genetically modified. And you seem
10 to have confirmed here in your presentation
11 that the one you use is not?

12 MS. VAN DYNE: Uh-hum.

13 MEMBER DICKSON: Are you aware of
14 any other GMO versions of this microorganism
15 or other --

16 MS. VAN DYNE: There can be other
17 versions of it that are GMO.

18 MEMBER DICKSON: Are there gellan
19 gums in the marketplace that you know of that
20 are the product of those microorganisms?

21 MS. VAN DYNE: Yes, there are,
22 uh-hum.

1 MEMBER DICKSON: But none of the
2 ones you manufacture?

3 MS. VAN DYNE: No, not the ones
4 that CP Kelco offers, uh-uh.

5 MEMBER DICKSON: Okay. Thank you.

6 MS. VAN DYNE: Uh-hum.

7 CHAIR RICHARDSON: Harold?

8 MEMBER AUSTIN: A two-part
9 question. I think part, to follow up on Jay's
10 question, was, during the original petition,
11 was there any information that was redacted in
12 that for gellan gum, for the original petition
13 when it was given to the Board?

14 MS. VAN DYNE: During -- I'm
15 sorry, Harold. I'm --

16 MEMBER AUSTIN: When gellan gum
17 was originally petitioned, was there any
18 redacted information in that original
19 petition?

20 MS. VAN DYNE: Oh, well, of
21 course, full information was given during the
22 petition process to the TAP Review Board or

1 the Reviewer Board.

2 MEMBER AUSTIN: Okay.

3 MS. VAN DYNE: There is certain
4 information that is proprietary to CP Kelco,
5 such as certain nutrient media, et cetera, not
6 the nutrient media issue, but just the
7 nutrient, you know, how we use it, the
8 process. As proprietary business information
9 which if falls into the hands of our
10 competitors, they could make the gellan gum.

11 MEMBER AUSTIN: Okay. To follow
12 up with that, during an annual review by an
13 inspector, a certifier, how difficult or non-
14 difficult would it be for them to ensure that
15 the source of your raw material, you know,
16 your material and stuff is not GMO and that
17 type of stuff, to ensure that what the claim
18 is the material is, that is really is, when
19 you undergo your annual review?

20 MS. VAN DYNE: That is a fair
21 question because I think it is really relevant
22 that certifiers are free to ask us questions

1 during that process, their review process.
2 And we provide them with all the information
3 that they need to make their decision, and it
4 includes statements and letters and
5 affidavits. So, we provide that information,
6 whatever they need to make their decision.

7 CHAIR RICHARDSON: Thank you very
8 much.

9 MS. VAN DYNE: Thank you.

10 CHAIR RICHARDSON: The next
11 speaker is Zareb Herman, and after that, the
12 next one I Wanda Jurlina.

13 MR. HERMAN: My name is Zareb
14 Herman. I am a Food Scientist with the Hain
15 Celestial Group, one of the largest producers
16 of organic products in the world.

17 We wish to support the relisting
18 of sodium acid pyrophosphate, also known as
19 SAP. SAP is a leavening agent used by many
20 organic food manufacturers. We use it for
21 leavening in a number of our organic products,
22 including cake and cookie mixes and frozen

1 pancakes and waffles.

2 When SAP is mixed with baking
3 soda, it provides a slow and steady release of
4 carbon dioxide for consistent rise and optimum
5 quality of baked products. Most of the other
6 leavening agents on the National List are
7 fast-acting and are used up too quickly. This
8 can lead to flat, dense, undesirable products.

9 Two substances on the National
10 List, dicalcium phosphate and yeast, are slow-
11 acting, but they are too slow-acting, too slow
12 except for maybe bread.

13 SAP is the only sustained-release
14 leavening agent on the National List that
15 works in many organic baking applications.
16 SAP is a simple grass substance that has been
17 used widely in food for many years. And SAP
18 produced in the United States and the vast
19 majority of other countries does not pose a
20 risk to the environment.

21 We also support the relisting of
22 activated charcoal, which is an important

1 filtering aid that has been used for
2 centuries. It is widely used by organic
3 handlers to filter water and a variety of
4 substances. My company uses it to filter
5 water as well as our refined organic oils.

6 Since organic oils are not
7 solvent-extracted, there are various
8 impurities that need to be removed. Activated
9 charcoal is unique because it has both
10 physical and chemical filtering properties,
11 including ion exchange and surface oxidation.
12 No other filtering aid on the National List
13 has these properties.

14 Activated charcoal is a grass
15 material. We have requested it remain on the
16 National List as a filtering aid.

17 Finally, we wish to support the
18 relisting of gellan gum. Gellan gum is an
19 essential ingredient in many organic products
20 as a stabilizer or thickener. We use it in a
21 number of our non-dairy beverages that are
22 fortified with calcium, which consumers need

1 when they cannot drink milk.

2 Gellan is especially effective in
3 keeping not only calcium, but other insoluble
4 substances suspended in liquid products.

5 Gellan has unique characteristics, and its
6 effectiveness at very low concentrations is
7 not matched by other gums or substances. We
8 have tried other gums, including guar, acacia,
9 and carrageenan, and no other gum is
10 comparable to gellan. Even when trying these
11 gums in combination at different
12 concentrations, the resulting products had a
13 chalky-mouth feel and the solids settled and
14 hardened on the bottom of the container.

15 This is one of our containers, and
16 we make the product. You know, we wish it
17 would sell immediately, but it sits on the
18 shelf. And sometimes if we don't have the
19 right gel system, it will turn into a brick on
20 the bottom.

21 Lastly, gellan gum is completely
22 safe. It is approved for use in food by

1 regulatory agencies all over the world. We
2 urge the Board to renew gellan on the National
3 List.

4 I would like to thank the Board
5 for their service, and a special thanks to
6 Miles and his staff for their excellent work.
7 We appreciate it. Thank you.

8 CHAIR RICHARDSON: Questions?
9 Harold?

10 MEMBER AUSTIN: Thank you.

11 Boy, I could throw you about 20
12 different questions.

13 (Laughter.)

14 But let's go to a new material,
15 activated charcoal. That is a 2016 sunset
16 material for handling. One of the concerns
17 coming in on the public comment has been,
18 after the activated charcoal has been used in
19 the process, that there may be some concerns
20 about environmental impact with the spent
21 material. Could you explain to us the process
22 that the spent material would go through as

1 far as reactivation or disposal for your
2 company or with your certifier's approval for
3 your annual review?

4 MR. HERMAN: I don't think I
5 really have the information to be able to
6 answer that. All I can say is I know that the
7 carbon or activated charcoal is used in many
8 filtration systems, and there are EPA
9 regulations governing the disposal of all
10 waste. And the companies have to comply with
11 those regulations. Usually, those filtration
12 systems are serviced by the provider and they
13 are responsible for complying with the proper
14 disposal of them.

15 MEMBER AUSTIN: Okay. Tomorrow
16 will be the first presentation for the 2016
17 sunset materials for handling. Activated
18 charcoal is on that list. That would be a
19 point of concern that this Subcommittee would
20 like individuals, companies like yourselves
21 that use the material, or the certifiers in
22 the room to be able to provide us with further

1 information on what happens with the spent
2 material as far as either recycling or
3 whatever, to ensure that we don't have an
4 environmental concern to deal with.

5 Thank you.

6 CHAIR RICHARDSON: Zea?

7 MEMBER SONNABEND: Thank you.

8 When you go through your annual
9 certification review, does your inspector ask
10 you for a proof that the gellan gum is not
11 GMO?

12 MR. HERMAN: Well, if you are
13 talking about a particular inspector, they
14 randomly check ingredient documentation. But
15 I think a better question is, you know, it is
16 reviewed by the certifier. If we have a
17 product, an organic product using gellan gum,
18 they look at that, those documents, and
19 everything has to be in order. It has to
20 comply with all the excluded methods and
21 everything else.

22 CHAIR RICHARDSON: Any other

1 questions?

2 (No response.)

3 Thank you very much, sir.

4 MR. HERMAN: Uh-hum.

5 CHAIR RICHARDSON: The next
6 speaker is Wanda Jurlina, followed by Jane
7 Finnigan.

8 MS. JURLINA: Thank you, everyone,
9 for the opportunity to talk to you today. I
10 am going to be talking about gellan gum and
11 what it brings to the organic producers.

12 I am the Technical Service Manager
13 at CP Kelco, and I have spent most of my 25-
14 year career working with food producers on
15 developing products that have the texture and
16 the delivery of the nutrients that they want
17 for consumers.

18 I have worked with all of the
19 ingredients that are on the current list, 605
20 and 606, in different applications, and I am
21 well aware of what they can do for food
22 processors.

1 Each one of these hydrocolloids or
2 gums, which are soluble fibers if you look at
3 them nutritionally, have their own unique
4 claim to fame.

5 For something like pectin, it
6 works exceptionally well in low pH systems and
7 has the ability to stabilize proteins in
8 environments where they are not stable.

9 Something like guar provides a
10 processor with viscosity at an inexpensive
11 cost.

12 Something like carrageenan has
13 historically been used in chocolate milk to
14 suspend cocoa.

15 What I am going to talk to you
16 today about is an ingredient, gellan gum, that
17 has its own unique claim to fame. And I have
18 a series of slides here that I am not going to
19 dwell on, but I am going to get to some
20 pictures and, then, a little bit of a
21 comparison.

22 There are many nutrients that we

1 love to deliver to organic consumers, and
2 those include things like insoluble fiber and
3 insoluble calcium. Those things, if not
4 uniformly dispersed through the product, will
5 settle to the bottom of the bottle, the
6 container, the carton, and they may not be
7 consumed by those people who think that they
8 are consuming those nutrients.

9 This is an example of what happens
10 when you stabilize a pineapple or a juice
11 beverage containing pulp and insoluble fiber
12 with pectin and with gellan gum. It is hard
13 to see because we have got some light shining
14 on the slides, but you can see there is a line
15 across the pectin system about, oh, probably
16 a quarter of the way up. And that is the pulp
17 and the fiber settled out in the product. Is
18 it a big deal in a fruit beverage? Probably
19 not. You can uniformly distribute that.

20 But when you start getting to
21 things like calcium in the form of calcium
22 carbonate, tricalcium phosphate, that is used

1 in many of these alternative milks to deliver
2 the calcium level that you have in regular
3 fluid milk, for those consumers, if that
4 calcium packs in the bottom of that carton, it
5 will remain in the bottom of that carton.
6 They will not be able to consume that calcium
7 because it hard-packs and does not
8 redistribute.

9 We put together some information
10 for the record showing the differences between
11 gellan gum and the other hydrocolloids that
12 are on the list. And really, what it comes
13 down to, there is nothing that suspends like
14 gellan gum. It helps processors deliver the
15 nutrients that their consumers expect.

16 Thank you.

17 CHAIR RICHARDSON: Thank you.

18 Questions?

19 Harold?

20 MEMBER AUSTIN: You have dealt
21 with a lot of the materials on the list, as
22 you said.

1 MS. JURLINA: Uh-hum.

2 MEMBER AUSTIN: In your opinion
3 and over the years your experience, how solid
4 of a replacement for carrageenan would gellan
5 gum be?

6 MS. JURLINA: Gellan gum is an
7 excellent replacement for carrageenan when we
8 are looking at the suspension properties of
9 carrageenan.

10 CHAIR RICHARDSON: Other
11 questions?

12 (No response.)

13 Thank you very much.

14 MS. JURLINA: Thank you.

15 CHAIR RICHARDSON: The next
16 speaker is Jane Finnigan, and on deck is
17 Baerta Klamczynska.

18 MS. FINNIGAN: Hello. My name is
19 Jane Finnigan. I am here as a consumer. I am
20 a member of the Cornucopia Institute, and I am
21 here today as a citizen lobbyist. I
22 volunteered to help present testimony because

1 I want to ensure the integrity of organic
2 food.

3 I also want to mention that I am a
4 grandmother of five, and two of my
5 grandchildren have food allergies.

6 Egg white lysozyme is a purified
7 enzyme isolated from egg white, approved for
8 use in organic production in 2006. The enzyme
9 is sometimes used as a preservative and in
10 certain cheeses and wines as an antimicrobial.

11 The enzyme is extracted from fresh
12 egg whites using a polymer resin that binds
13 the lysozyme. And then, the resin is removed
14 from the lysozyme using salts, then
15 concentrated, purified, and dried.

16 It is classified as non-synthetic,
17 according to the Technical Review in 2011, but
18 that determination seems questionable to our
19 scientific staff, based on the use of solvents
20 in its production.

21 A few of the major concerns with
22 the material are:

1 This material was approved without
2 even having a Technical Review. The original
3 review in 2000 on enzymes did not mention egg
4 white lysozyme, nor did the one in 2003. It
5 wasn't until 2011 that egg white lysozyme was
6 covered under an enzyme Technical Review. How
7 was this material approved in the first place
8 without solid Technical Review?

9 The eggs used to produce this
10 enzyme come from conventionally-produced,
11 caged layer hens. This product supports that
12 industry. The issue of conventional egg
13 production with its resulting animal welfare
14 issues and environmental impacts was not even
15 mentioned in the 2011 Technical Review.

16 Allergens. Egg whites are known
17 to be allergic to egg-sensitive individuals.
18 Because of this, the European Commission
19 requires that the word "egg white lysozyme" be
20 used as an ingredient when used in foods like
21 cheese and wine.

22 The United States Food and Drug

1 Administration does not require this material
2 to be listed on the label. Therefore,
3 consumers who have egg allergies will not be
4 informed if a product is safe for them or not.

5 Essentially, our survey did not
6 find a single certified organic cheese-maker
7 using this product, and only 5 out of 19
8 certified organic winemakers responded saying
9 that they use this product. Alternative
10 methods clearly exist.

11 Please see the survey results that
12 we passed out for more detail on the responses
13 we obtained. A couple of things that stood
14 out were the idea that you could control for
15 late blowing in cheese by using different
16 cultures, such as holdback, and by not using
17 milk from cows that were fed on fermented
18 feeds.

19 Many winemakers who don't use this
20 enzyme pointed out the need for using high-
21 quality grapes and practicing impeccable
22 sanitation in the winemaking process to

1 prevent bacterial spoilage. There are many
2 other alternatives to using this enzyme in
3 organic cheese and wine.

4 In conclusion, our survey data
5 indicates that this material is likely not
6 essential for cheese or winemakers. Until we
7 can obtain more information on the question of
8 synthetic versus of non-synthetic, the
9 environmental impacts of conventional eggs
10 produced --

11 (Signal that time is almost
12 expired.)

13 I am going to thank you. You're
14 going to cut me off now.

15 If you have any questions, I am
16 going to defer to the Cornucopia Institute
17 scientists.

18 Thank you.

19 CHAIR RICHARDSON: Thank you very
20 much, Jane.

21 The next speaker is Beata
22 Klamczynska, and on deck is Peggy Miars.

1 MS. KLAMCZYNSKA: Good afternoon,
2 everybody.

3 My name is Beata Klamczynska. I
4 am here today representing Solazyme. And I
5 want to talk on behalf of whole algal flour
6 and why I think it should be included in
7 organic products.

8 What is Algal flour? Algal flour
9 is literally just plain and simple algae that
10 has been very minimally processed, washed and
11 dried, and there is nothing removed or added
12 to it.

13 And it has many components. It
14 has a very healthy lipid component, high in
15 mono unsaturated fatty acids. It also has
16 natural emulsifiers present. It has a high
17 level of fibers, both solubles and insolubles
18 coming from the algae cell walls. It also has
19 other carbohydrates, simple sugars, and
20 micronutrients.

21 You can see the picture. The
22 yellow color in this powder comes from

1 naturally-occurring gluten. So, it has a lot
2 of natural, very beneficial ingredients
3 present.

4 And I can tell you I have been
5 working in food formulations for over 15 years
6 now, and I have never seen an ingredient that
7 is similar to this algal flour. That is why
8 I don't think we should think of it as a
9 replacement to anything that is already on the
10 market. Think of it as something that is
11 completely new and unique and allows you to
12 formulate products that have some benefits
13 that were not able to be realized before using
14 other ingredients.

15 And I have a few examples for you
16 today, so you can understand it. One of the
17 examples is formulating products that are
18 vegan and have no allergens by replacing eggs
19 or other emulsifiers.

20 In this example, we have
21 formulated a challah bread that is naturally
22 usually really high in eggs. In the process,

1 we not only took out the allergens and made it
2 vegan, but we also decreased the total fat by
3 over 60 percent, decreased saturated fat by 50
4 percent, and this product has zero
5 cholesterol. So, it is much healthier for
6 you.

7 And you can see in the formulation
8 here, it was done by simply using 4 percent of
9 the algal flour and replacing a much larger
10 quantity of eggs and oil, and just adding some
11 more water.

12 So, you can see it is a very
13 simple formulation. There is really nothing
14 strange about it, and you can use it in very
15 different baking goods.

16 Another example I have is an
17 Alfredo sauce, which Alfredo sauce is
18 notoriously high in fat. And people who are
19 trying to cut down on their fat intakes have
20 a hard time finding a very good substitution
21 that still tastes great.

22 In this example, we were able to

1 cut down fat by 40 percent, saturated fat by
2 30 percent, and calories by almost 30 percent,
3 also reduced cholesterol.

4 And when we did consumer
5 acceptability studies, they couldn't even tell
6 the difference between those two formulations,
7 which tells you how great of a mouth feel and
8 overall properties this algal flour provides.

9 And if you look at the
10 formulations, it is also very simple. We took
11 some butter out, some eggs out, and added only
12 3 percent of the algal flour in this
13 formulation.

14 And another example, since we have
15 some time, cookies, shortbread cookies that re
16 usually very high in butter. We were able to
17 cut down the fat by 20 percent, cholesterol
18 and saturated fat by 33 percent, and calories
19 by 10 percent. And we did it by reducing the
20 butter and using a 3-percent algal flour in
21 the formulation, and not really changing
22 anything else other than rebalancing the flour

1 and water.

2 And I hope this helps you to
3 understand that this is brand-new ingredient,
4 and it can help organic consumers to have
5 healthier products.

6 Any questions?

7 VICE CHAIR FOSTER: Thank you.

8 Are there any questions for this
9 commenter?

10 Harold?

11 MEMBER AUSTIN: During the public
12 comment period, and then, during the Handling
13 Subcommittee's review of the petition and the
14 petition addendum, one of the concerns that
15 has come up, especially during the public
16 comment period, is the actual source of the
17 algae. There are some concerns that have been
18 raised during the commentary period about the
19 possibility of excluded methods being used to
20 formulate the algae itself, the base starting
21 substrate of it.

22 Could you explain to us that part

1 of the process or give us why that should or
2 should not be a concern?

3 MS. KLAMCZYNSKA: So, the algae
4 that we use for this ingredient is absolutely
5 100-percent natural. There is no modification
6 to the algae itself. And actually, our next
7 speaker is our regulatory person that can
8 maybe give you a little bit more detail on
9 that. But, as far as I know, it is a
10 naturally-occurring strain of algae that has
11 not been modified in any way.

12 CHAIR RICHARDSON: Other
13 questions?

14 (No response.)

15 Great. Thank you very much.

16 MS. KLAMCZYNSKA: Thank you.

17 CHAIR RICHARDSON: The next
18 speaker is Peggy Miars, and after that will be
19 Nate Lewis.

20 MS. MIARS: Good afternoon.

21 I'm Peggy Miars, Executive
22 Director of OMRI, the Organic Materials Review

1 Institute.

2 I am not addressing agenda items
3 today. Instead, I bring you greetings from
4 Istanbul, where the Triennial World Congress
5 and General Assembly of the International
6 Federation of Organic Agriculture Movements,
7 or IFOAM, were held two weeks ago.

8 One interesting note is that IFOAM
9 will be looking at the issues of cell fusion
10 and soil conservation in the next few years,
11 as all of you will. In fact, 2015 is the
12 United Nations International Year of Soils.
13 So, I expect a lot of attention to be paid to
14 soil conservation and soil health next year
15 and for years to come.

16 At the IFOAM meetings, I found it
17 fascinating to interact with organic
18 producers, certifiers, and stakeholders from
19 around the globe and to hear the similarities
20 and differences in organic standards.

21 I came away with two themes from
22 the meetings and from the hallway discussions.

1 One is that certification is overwhelming to
2 both certifiers and operators and focuses more
3 on proving compliance and strict recordkeeping
4 rather than looking at operations from a
5 holistic approach. Some international
6 participants questioned whether certification
7 is actually needed.

8 And No. 2, material review is
9 confusing and is handled quite differently in
10 other countries than here in the United
11 States. We agonize over inerts and ancillary
12 substances while the rest of the world
13 overlooks them and it is accepted by
14 consumers.

15 Now I am not saying that we should
16 do what the rest of the world does. OMRI is
17 a neutral organization. So, I am not
18 advocating for any specific solutions.
19 Rather, I bring these issues to your
20 attention, so that we are aware of what is
21 happening internationally and don't operate in
22 a vacuum.

1 Another takeaway from the IFOAM
2 meetings was how much the U.S. organic
3 industry is watched the revered. People
4 around the world know about the NOP and the
5 NOSB and respect the work of both.

6 And I think that we in the United
7 States are fortunate because some governments
8 have one person in charge with no organic
9 experience who makes unilateral decisions
10 about organic standards without soliciting any
11 input from stakeholders. And once a decision
12 is made, there is no discussion about it.

13 Others, such as Canada, have
14 minimal governmental involvement and expect
15 the industry to monitor, maintain, and
16 interpret the standards. And that may sound
17 good, but it is a heavy burden on the organic
18 community, and decisions are made and
19 implemented slowly.

20 Imagine if the USDA only paid half
21 the cost of these meetings and all of us had
22 to donate the rest of the money, so that any

1 work could be done. And on top of that, we
2 would all be volunteering our time to maintain
3 and update the standards.

4 In summary, the United States is
5 recognized as a global leader in organic. We
6 have a participatory process, probably more so
7 than any other industry in this country.

8 And I appreciate the hard work and
9 long hours put in by the NOP staff, NOSB
10 members, as well as the rest of us who work
11 tirelessly on behalf of organics. You're
12 doing an admirable job, given time, money, and
13 personnel restraints. And I thank you for
14 your work on important issues.

15 CHAIR RICHARDSON: Thank you,
16 Peggy.

17 Questions? Comments?

18 (No response.)

19 Thank you very much.

20 MS. MIARS: Thank you.

21 CHAIR RICHARDSON: Nate, you're
22 up, and on deck is Nicholas Gardner.

1 MR. LEWIS: All right. Madam
2 Chair, thanks for the opportunity to provide
3 comment today. And hopefully, we all can make
4 it through. I know it is getting late.

5 I want to cover a number of
6 topics, and I appreciate any questions that
7 come my way.

8 As far as assessing the soil
9 conservation practices, we applaud NOSB for
10 bringing this issue to forefront and
11 highlighting the environmental benefits of
12 organic production. Organic is so much more
13 than materials used, and practice standards
14 are where the organic farming systems shine.

15 It is critical, however, that
16 producers and certifiers have tools to make
17 these assessments that are as dynamic as the
18 systems themselves. It appears NOSB
19 appreciates this fact and will keep it in mind
20 as it reviews how organic regulations and NRCS
21 conservation practices can work
22 synergistically.

1 I will suggest that NOSB consider
2 the work of Northeastern University's Humic
3 Acid Research Group and their National Soil
4 Project. OTA and the Organic Center have
5 partnered with this group, and it provides
6 free testing of soils for stable organic
7 matter, humic acids, fulvic acids, and human.
8 And this might be appropriate for establishing
9 baselines and evaluating long-term soil
10 health.

11 On the issue of contamination of
12 farm inputs, farmers need to know what
13 contamination vectors there are and how to
14 mitigate those risks. It is good work by the
15 NOSB to start this conversation and lay the
16 groundwork for guidance on best practices to
17 avoid contamination.

18 I have a couple of suggestions for
19 additions to this conversation.

20 First, as part of your work on
21 seed purity, please consider including a
22 section on avoiding genome contamination in

1 seeds used on organic farms. Seeds are inputs
2 as well.

3 Second, the document really needs
4 to include discussion on the current oversight
5 of inputs from state and federal government
6 agencies. This will paint an accurate picture
7 of the regulatory framework within which
8 organic producers exist, and I provide some
9 specifics in our written comments on this.
10 And you all have a copy of our booklet. So,
11 you can refresh yourselves on OTA's comments
12 on all the topics.

13 I also want to offer my expertise
14 and direct experience in materials review,
15 pesticide residue sampling, compost,
16 investigation of contamination events on
17 organic farms, interactions between certifiers
18 and government regulators, and laboratory
19 testing procedures to assist the Crops
20 Subcommittee in further development of the
21 best practices to avoid contamination from
22 farm inputs.

1 On hydrogen chloride, I had the
2 opportunity to tour Dr. Holt's research
3 facility in Lubbock, Texas last month. Take
4 a look on page 26. The prototype is not ready
5 for commercial production. It is a tabletop
6 model right now. They are optimistic that
7 something can be made by next fall, but that
8 is past the sunset review date for the Board.
9 So, just please keep that in consideration.

10 On sulfurous acid, we have some
11 late-breaking news, I guess. We had a whole
12 flurry of responses to our survey. We had 12
13 responses, representing over 4,000 acres from
14 the U.S., Mexico, and Saudi Arabia. And these
15 are crops like coffee, avocados, vegetables,
16 berries, citrus, date palms, stone fruit. And
17 I would be happy to provide a written summary
18 of this for everyone to consider.

19 I also just want to remind you
20 that forcing procedural delays in the sunset
21 review of any substance based solely on an
22 opinion about the Subcommittee process hurts

1 organic farmers and producers. We all need to
2 watch each card we play and play it slow, but
3 please don't let that deal go down.

4 Thanks.

5 CHAIR RICHARDSON: Thank you,
6 Nate.

7 Questions? Comments?

8 Yes, Zea?

9 MEMBER SONNABEND: Thanks, Nate.

10 I couldn't help but notice in your
11 comments that you didn't provide any on our
12 2016 sunsets. And this is the time when we
13 are trying to gather information of how
14 widespread these things are used in the
15 industry.

16 And did your surveys not tackle
17 that, that you couldn't provide results, or
18 what was up with that?

19 MR. LEWIS: So, we didn't comment
20 on the 2016 simply because we did not get
21 responses to the surveys. And I guess I will
22 use it as an opportunity to explain our

1 survey, the concept, that were are trying to
2 assess essentiality based on the businesses
3 and producers who are using these materials
4 currently.

5 And so, that is entirely how our
6 surveys are geared. We send those out to our
7 membership, through our certifier members, and
8 they are available for all certified
9 operations to participate in. And they have
10 specific questions related to the material
11 that is up for review.

12 And they also refer to the
13 products based on their brand names or the
14 ways that farmers typically talk about them.
15 So, sulfuric acid survey referenced it as a
16 sulfur burner, which is how the rest of the
17 world talks about that particular material.

18 So, the lack of comments on those
19 2016 sunset materials was just due to a lack
20 of response to our surveys, and we are hoping
21 that, as we sort of energize the industry and
22 sector to engage more, they will see this

1 opportunity as a much more meaningful way to
2 communicate with the Board.

3 CHAIR RICHARDSON: Harold?

4 MEMBER AUSTIN: Yes, Nate, just to
5 follow up a little bit more on the producer
6 surveys that you guys are working with and
7 stuff, could you elaborate a little bit more
8 on those surveys? What kind of farmer
9 response, producer response are you getting,
10 and are you able to get them engaged? And if
11 not, how are you going to go about that part
12 of it?

13 MR. LEWIS: Since this is the
14 first time, this is the first round of sunset
15 reviews under the new Sunset Review Policy,
16 and having those two opportunities for
17 comment, I don't think the sector at this
18 point is really used to that. And so,
19 responding to a survey about something that is
20 going to be discussed next year may not -- you
21 know, right now, it doesn't seem particularly
22 relevant.

1 I think as we move forward and
2 people see their comments incorporated in the
3 recommendations, like we saw in sulfurous acid
4 from last meeting's comments, I think we will
5 see that becoming a bigger part of the way
6 that people engage with the comment process.
7 So, I am optimistic on this.

8 MEMBER AUSTIN: A followup on
9 that: as we move into the revision of the
10 sunset process, and we are now into the two-
11 step process, what can we do different as a
12 Board or as Subcommittees when we are working
13 on these materials and we are prepping them
14 going forward? Is there anything that you see
15 or OTA sees that we could do different to help
16 generate better responses from all of the
17 organic sector?

18 MR. LEWIS: Well, I think keeping
19 it in plain speak. You know, the group that
20 I am generally interacting with are farmers.
21 And aqueous potassium silicate does not really
22 mean much to them. Sil-MATRIX might.

1 So, whatever the Board can do to
2 make the language common, so that we know we
3 are going to get someone to respond because
4 they are aware of the way that particular
5 substance is referred to, I think it is going
6 to bolster the process entirely.

7 CHAIR RICHARDSON: Jay?

8 MEMBER FELDMAN: Thanks for your
9 comments.

10 Do you think having more technical
11 information at this meeting, say the first
12 meeting before a review or before the second
13 decision meeting, would help generate more
14 comment, more involvement?

15 MR. LEWIS: Do you mean like if
16 you, as the Board, provided more technical
17 information the first time around, would
18 that --

19 MEMBER FELDMAN: Yes, would that
20 help to generate more engagement in the
21 comment process?

22 MR. LEWIS: Well, I think more

1 information upfront generally does help that
2 conversation.

3 MEMBER FELDMAN: Thank you.

4 CHAIR RICHARDSON: Any other
5 questions? Comments?

6 (No response.)

7 Thanks very much, Nate.

8 MR. LEWIS: Thanks.

9 CHAIR RICHARDSON: The next person
10 up is Nicholas Gardner, and Kate Davis on
11 deck.

12 MR. GARDNER: Good afternoon.

13 My name is Nicholas Gardner, and I
14 am commenting on behalf of the International
15 Food Additives Council, or IFAC.

16 IFAC is a global association
17 representing companies that produce high-
18 quality substances used worldwide as food
19 additives and food ingredients.

20 I appreciate the opportunity to
21 offer the following comments on gellan gum and
22 sodium acid pyrophosphate, or SAP.

1 First off, IFAC strongly supports
2 the continued listing of gellan gum on the
3 National List at Section 205.605(a). As you
4 have heard today already, gellan gum is an
5 approved food additive in the U.S. and has
6 been approved by numerous other regulatory
7 agencies around the world.

8 It is IFAC's understanding that
9 there are currently no other certified organic
10 gums that have the same properties as gellan
11 gum in the organic applications where it is
12 currently used.

13 Gellan gum provides the organic
14 industry with unique functionality unavailable
15 with other stabilizers and thickeners and
16 provides organic consumers with a variety of
17 innovative and healthy products.

18 Gellan gum is a versatile
19 ingredient used in applications such as dairy
20 and non-dairy milks, nutritional products,
21 juices, yogurts, and sour creams, bakery
22 products and fillings, fruit sauces and

1 spreads, dairy desserts and flans, and
2 dressings and sauces.

3 Gellan gum is particularly
4 suitable for suspending protein, minerals,
5 vitamin, fiber, and pulp in fortified
6 beverages. Calcium-fortified beverages, such
7 as soy, rice, and almond milks, are of great
8 interest to organic consumers who may not be
9 able to or choose not to consume dairy milks.

10 Gellan offers gel texture and
11 mouth feel to replace animal-based gelatin,
12 which provides more options for vegetarians
13 and people who keep kosher or hallal diets.

14 For these reasons, IFAC strongly
15 supports the continued listing of gellan gum
16 at 205.605(a). Delisting gellan gum would
17 impact numerous existing organic offerings and
18 limit potential for development of new
19 products to meet growing organic demand and
20 innovative organic options.

21 IFAC also supports the continued
22 listing of sodium acid pyrophosphate on the

1 National List at Section 205.605(b).
2 Relisting SAP, a substance considered
3 generally recognized as safe in the U.S., is
4 critical because it is the only listed
5 leavening agent that provides the controlled
6 leavening needed during manufacturing a range
7 of bakery products.

8 The biggest challenge in
9 formulating baked goods is controlling the
10 release of carbon dioxide at a rate that
11 allows the right amount of leavening to occur
12 at the proper time. Many other leavening
13 agents release CO2 too early. If too much CO2
14 is produced too early, baked goods do not rise
15 sufficiently and will have an undesirably low
16 volume. Releasing CO2 too late is also
17 problematic and can lead to product quality
18 issues, such as surface cracking.

19 SAP is also important when
20 producing frozen or refrigerated doughs
21 because some grades of SAP release CO2 very
22 slowly, which is required to optimize

1 leavening in these doughs.

2 SAP is the only organic leavening
3 agent that provides the exacting leavening
4 control needed to produce a range of bakery
5 products. It would be very difficult or
6 likely impossible to produce the following
7 products for the organic market without SAP:
8 waffles, pound cakes and similar cake mixes,
9 pancakes and pancake mixes, biscuit and
10 biscuit mixes, cookie and cookie mixes, and
11 other refrigerated or frozen doughs.

12 I would also like to respond to
13 some of the environmental concerns that have
14 been raised with the production of SAP and
15 other phosphates.

16 (Signal that time is almost
17 expired.)

18 Well, I will not have a chance to
19 get to those, but thank you for the time.

20 CHAIR RICHARDSON: Thank you,
21 Nicholas.

22 Questions?

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Harold?

MEMBER AUSTIN: Could you go ahead and get to those, please?

MR. GARDNER: Sure. The main thing I wanted to say is that the majority of SAP and its constituents that are used in foods, particularly the organic products that we are here talking about today, are produced in countries like the U.S. in compliance with strict environmental regulations that do require containment and/or treatment of any possible contaminants or byproducts resulting from production of phosphate ore or refinement of the ore to produce raw materials used in food manufacturing.

One thing I want the Board to consider is that we did survey our membership, which includes a number of phosphate manufacturers, and all of the constituents for SAP or the SAP that is produced by our members is sourced from phosphate rock that is mined here in the U.S.

1 CHAIR RICHARDSON: Thank you.

2 Questions?

3 Zea?

4 MEMBER SONNABEND: Thank you.

5 You didn't address it in your oral
6 comment just now, but your written comment you
7 were one of the few people who spoke up in
8 favor of tetrasodium pyrophosphate. And I am
9 wondering because our Technical Review we had
10 on the substance listed many, many
11 alternatives in a wide variety of food
12 categories.

13 And your written comment didn't
14 give specifics about which exact foods would
15 be affected by lack of this. And I would like
16 to know a list like you just gave for the SAP
17 of which exact foods. Is it like veggie
18 hotdogs or, you know, veggie burgers or --

19 MR. GARDNER: Yes, it is difficult
20 from an association perspective to necessarily
21 speak to individual products, but it is in
22 those meat analogs.

1 MEMBER SONNABEND: And I don't
2 mean brand names, of course, but --

3 MR. GARDNER: Yes, yes. Sure.

4 MEMBER SONNABEND: -- just the
5 types of product.

6 MR. GARDNER: Yes, my
7 understanding is a number of the extruded
8 shaped products such as like veggie bacon
9 alternatives, hotdogs, some of those that need
10 to retain shape after going through an
11 extrusion process.

12 CHAIR RICHARDSON: Other
13 questions?

14 (No response.)

15 All right. Thank you very much.
16 That was very helpful.

17 MR. GARDNER: Thank you.

18 CHAIR RICHARDSON: The next person
19 up is, let's see, Kate Davis, with Beth Unger
20 on standby.

21 MS. DAVIS: Good afternoon, Madam
22 Director, Members of the Board.

1 My name is Kate Davis. And as the
2 Director of America's Marketing for CP Kelco,
3 it is both my pleasure and privilege to be
4 able to address you today.

5 I want to reiterate the
6 essentiality of gellan gum versus its
7 alternatives, especially to its suspension
8 properties in organic consumer goods.

9 Gellan is not limited by
10 processing. It fits right into existing
11 processes, whether they are hot or cold. So,
12 it is very easy for the organic processors to
13 use.

14 And referring back to the photos
15 that Wanda showed, you will remember that
16 there was an almond milk that had locust bean
17 gum at .15 percent. It was suspending almond
18 solids and calcium carbonate. We got a great
19 suspension with our KelcoGel gellan gum at
20 one-fifth that amount. So, it is used at
21 lower levels than many other standard feeds.

22 Gellan can be used to deliver

1 calcium fortification to a growing range of
2 consumers who can't have the milk proteins or
3 who are lactose-intolerant. And gellan is
4 especially effective at keeping calcium and
5 other insoluble but necessary minerals in
6 suspension. It is both dairy- and gluten-
7 free.

8 It can also make fruit and
9 vegetable snacks with nutraceutical additions,
10 such as lutein, or even a Jello-style snack
11 that incorporates minerals, proteins, and
12 fruit pieces.

13 It can be used to make capsules
14 that work for vegetarians or for those who eat
15 kosher.

16 So, for the organic community at
17 large, producers and consumers both need for
18 the NOSB to preserve the listing of high-acyl
19 gellan gum, 205.605.

20 Thank you.

21 CHAIR RICHARDSON: Thank you.

22 Questions?

1 (No response.)

2 Very good. Thank you very much.

3 MS. DAVIS: Thank you.

4 CHAIR RICHARDSON: The next
5 speaker is Beth Unger, and waiting in the
6 wings we will have Teresa Chan.

7 MS. UNGER: Good afternoon.

8 Thank you very much for the
9 opportunity to approach you about my favorite
10 topic, gellan gum.

11 (Laughter.)

12 I am Beth Unger from the
13 Certification Department at Organic Valley.
14 We are the largest organic farmer-owned
15 cooperative in the nation, with over 1800
16 farmers. And as Star mentioned previously,
17 1450 of them are dairy farmers.

18 By the way, thank you very much,
19 Madam Chair, for your introduction today.
20 That was heartwarming.

21 So, I want to be perfectly clear
22 about gellan gum, and also to give you a

1 little bit more information than what we
2 provided in our written comment because this
3 is a pretty critical thing.

4 Over five years ago, we had
5 started the process of replacing carrageenan
6 with gellan gum in our soy products. And
7 then, after the NOSB meeting where
8 carrageenan, you know, was brought up as a
9 potential health issue, we really accelerated
10 that. So, we have put endless dollars of
11 product development time into making a
12 replacement.

13 There were many other things that
14 were tried as we were going through this
15 process, as was detailed in our written
16 comment. So, you can refer to that.

17 But what I wanted to do is give
18 you some very compelling information about
19 what the impact of removing this material from
20 the list after all of this time and money and
21 research was spent to go ahead and replace
22 carrageenan with gellan gum.

1 First of all, the sales impact on
2 an annual basis at our 2015 projections is \$66
3 million worth of product that would contain
4 gellan gum. That represents 43 million pounds
5 of milk. For our average-sized farm, that
6 would be the annual production of somewhere
7 between 40 and 50 of our farms. So, this is
8 not a small impact that you are dealing with
9 here.

10 I heard CP Kelco clarify that it
11 is not a GMO issue, as was brought up in many
12 of the public comments.

13 And I wanted to introduce you to a
14 new product line that we have. These are milk
15 protein shakes. This is something that needed
16 to happen out there for our organic consumers.
17 This is a wonderful short ingredient list
18 alternative to like MuscleMilk, which has 40-
19 some ingredients and no milk.

20 (Laughter.)

21 So, you know, this is a very
22 popular product line. It has got gellan gum,

1 all four SKUs. So, I want you to think about
2 this very carefully.

3 I also want to thank the Board
4 members and the NOP staff for your dedication
5 and the hard work you are putting in. And the
6 four exiting members, thank you for five years
7 of a lot of work.

8 CHAIR RICHARDSON: Thank you,
9 Beth.

10 Questions?

11 Harold?

12 MEMBER AUSTIN: Thanks, Beth.

13 Now you brought samples of that
14 for all the Board, right?

15 (Laughter.)

16 MS. UNGER: Yes, I didn't bring a
17 big enough suitcase.

18 (Laughter.)

19 MEMBER AUSTIN: Well, we will
20 share.

21 In your product line and stuff,
22 with the switchover from carrageenan utilizing

1 gellan gum, have you been able to successfully
2 make that transition with everything that you
3 previously had used carrageenan? Have you
4 been able to make that switchout?

5 MS. UNGER: Yes, we have. The
6 last remaining product that we intend to have
7 switched out in early 2015 is th
8 ultrapasteurized heavy cream. That one has
9 been a little bit of a bugger for the
10 switchout, but we are about there.

11 MEMBER AUSTIN: So, with the rest
12 of the products that you have already made
13 that transition with the lack of the one, how
14 has that worked? I mean, has that been a
15 successful move for you?

16 MS. UNGER: It has. You know,
17 when you look at something like a milk protein
18 shake, I think that the expectation would be
19 probably a little thicker consistency, and the
20 difference between using carrageenan or gellan
21 gum, this would be a thinner consistency. I
22 think it is fine personally.

1 CHAIR RICHARDSON: Great. Thanks
2 very much, Beth.

3 The next speaker is Teresa Chan,
4 with Rick Green in the wings.

5 MS. CHAN: Hi. My name is Teresa
6 Chan. I am the Senior Manager, Regulatory
7 Affairs, at Solazyme, and we are the
8 petitioner for whole algal flour.

9 I want to thank the NOSB and the
10 NOP for the hard work that you do, and I ask
11 you today to reconsider listing whole algal
12 flour on the National List.

13 I want to take this opportunity to
14 address some misconceptions and questions that
15 arose from some of the public comments posted
16 and address the concerns of the Subcommittee.

17 First, despite what you may read
18 in the media, Solazyme is not a synthetic
19 biology company. We are a biotechnology
20 company using traditional genetic engineering
21 to produce sustainable, high-performance oils
22 derived from microalgae.

1 However, our portfolio of whole
2 algal ingredients, which includes whole algal
3 flour, used native algae strains that have not
4 been modified. So, to answer Harold's
5 question earlier, the algae used in whole
6 algal flour is not genetically modified.

7 Second, the Handling Subcommittee
8 had concerns on the redaction of confidential
9 business information in our petition which
10 were regarding the substances used for
11 fermentation. In our written comments, we
12 have removed the redactions to address the
13 concerns.

14 Like other microorganisms, such as
15 bacteria and yeast, we can grow our microalgae
16 in fermenters instead of open ponds and
17 photobioreactors. Our fermentation nutrients
18 and media are food-grade ingredients that are
19 used throughout the food fermentation
20 industry. So, there is nothing new, novel, or
21 harmful about these substances. It should be
22 noted that these nutrients are also used in

1 other fermentation-derived ingredients that
2 are already listed on the National List in
3 Section 205.605, such as xanthan gum.

4 Our manufacturing process is
5 essentially growing the algae in fermenters,
6 then pasteurizing, drying, and milling the
7 algae. No solvents are used and nothing is
8 extracted. Whole algal flour is dried, milled
9 algae. It is also grass and has received a no
10 questions letter from the FDA, prerequisites
11 for submitting new petitions to the Board.

12 Lastly, organic consumers deserve
13 to have a choice to purchase organic products
14 that are non-allergenic, vegan, and healthy.
15 I am a mother of two young children and an
16 organic consumer. Adding whole algal flour to
17 the National List will allow me to buy organic
18 products for my family that are healthier with
19 less fat, calories, and cholesterol without
20 sacrificing on taste and texture.

21 There are no alternative
22 substances on the National List that have the

1 same functionality and benefit as whole algal
2 flour. None of the starch products, gums, and
3 hydrocolloids can reduce the fat, calories,
4 and cholesterol content of organic foods.

5 I ask the NOSB to strongly
6 reconsider their position and to add whole
7 algal flour to the National List.

8 Thank you.

9 CHAIR RICHARDSON: Thank you,
10 Teresa.

11 Could we have some questions from
12 the Board?

13 (No response.)

14 No? No questions.

15 MS. CHAN: Thank you.

16 CHAIR RICHARDSON: Okay, thank
17 you.

18 Rick Green is up next, and Alexis
19 Randolph is waiting in the wings.

20 MR. GREEN: Okay. Hello,
21 everyone.

22 So, I am Rick Green from Solazyme.

1 And from some of the comments I read, I know
2 you were expecting someone with horns and a
3 tail, reeking of sulfur and brimstone. But
4 Solazyme is just a bunch of people trying to
5 make good products.

6 As Teresa pointed out, this
7 particular product does not have any GMO
8 content. The reason we are here is because we
9 were asked by our customers. We had not
10 started this product intending it to be
11 something organic listed, but there was an
12 overwhelming response from customers at trade
13 shows, at inquiries, saying, "Could you get
14 this organic listed?" So, we are really here
15 for those people who asked us to try to do
16 this for them, because it is something that
17 they see as adding value in their products.

18 From my own experience, I have
19 people in my own family who can't have milk in
20 products. And so, we have to look for
21 alternatives.

22 Now, when we say whole algal flour

1 is a replacement, it is not really a
2 replacement. You are not going to have a
3 glass of whole algal flour with your cookies.
4 You are not going to have a whole algal flour
5 omelet. Remember, this is going to be used at
6 less than 5 percent.

7 But I think Beata gave some good
8 examples of how it could be beneficial. And
9 Solazyme is based in south San Francisco. And
10 we have a lot of vegans there, and we also
11 have a lot of vegetarians who say that they
12 eat eggs and dairy, but vegans call them
13 "cheaters".

14 (Laughter.)

15 But the vegans say, "I like an
16 alternative." And so, for those people, the
17 people, whether for cultural or dietary
18 reasons, or because of health reasons in the
19 way of allergens, would like an alternative,
20 we think that organic customers should be able
21 to have that.

22 There was a comment about the

1 impact on eggs and dairy, saying, "Well,
2 you're going to displace eggs and milk." We
3 are not really going to do that. The people
4 that are looking for an alternative don't want
5 those things anyway. They don't want to
6 consume those things. Maybe they can't or it
7 is just a preference.

8 So, at less than 5 percent, we are
9 not going to have a huge impact on dairy
10 farmers or egg producers, but it will have a
11 big impact on the people who would like to
12 have that choice.

13 So, I would like to thank the
14 Board for this time, and I will entertain any
15 questions.

16 CHAIR RICHARDSON: Questions?

17 Harold?

18 MEMBER AUSTIN: Thank you for your
19 presentation.

20 I think one of the things for us
21 on this subcommittee as well as on the Board,
22 you kind of touched on it a little bit, is we

1 are looking at a material that won't totally
2 replace materials or substances that are
3 organic in nature right now that are currently
4 being used, but it will be a partial
5 substitute.

6 Something that we are having to
7 play with in our minds, removing something
8 that is already satisfying a specific need
9 that is already organic or organic certified
10 with this potential synthetic material or a
11 substitute material, we have seen your
12 testimonies. We have seen your written public
13 comments. We have seen those from two other
14 companies that are in support of your material
15 getting registered, but we haven't seen any
16 support documentation or letters from anybody
17 else that is saying that there is a specific
18 need, that we want this.

19 And I think that is probably one
20 of the points that I am having the most
21 difficulty with trying to grasp, is what
22 really is that need, without us seeing

1 consumers or other individuals coming here to
2 say, "Hey, we want this." We hear you telling
3 us that, and I am not saying that you haven't
4 heard that. We just haven't seen the show of
5 support. And I guess that is kind of my
6 biggest concern at this juncture, is what
7 really is that need; what really is that
8 support out there.

9 MR. GREEN: Right. Well, I can
10 tell you that the companies that would like to
11 offer these products, they must have customers
12 who have expressed the need for it.
13 Otherwise, they wouldn't be interested.

14 This is, you know, a relatively-
15 new ingredient. So, people are still learning
16 about it. There are lots of people who are
17 looking at it for the not in organic products.
18 So, it is being used for the other benefits
19 that it has outside of organic.

20 So, the real question before the
21 Board is, is this something that it would
22 serve the organic community? Can those

1 organic customers benefit from this? And
2 should they be given that choice? Because no
3 one has to use this material. You know, it is
4 optional. Anything on the list is optional to
5 use.

6 But I believe, because I have
7 people that have food allergies and all the
8 vegans back at work think that you should have
9 an alternative, and if you don't want or need
10 that alternative, you don't have to use it.
11 So, those products will benefit a certain
12 portion of the organic community. And the
13 question is, does the Board think it is
14 important enough to serve those people?

15 CHAIR RICHARDSON: Harold?

16 MEMBER AUSTIN: Thank you for
17 that.

18 To just clarify, I guess one of
19 the criteria that we will look at, any
20 material that would be added to the National
21 List would be essentiality would be one of the
22 criteria. If we had heard from those

1 consumers that are looking for a vegan or a
2 vegetarian or a non-allergenic source, it
3 would, I think, serve us better.

4 I think we are all about giving
5 opportunities to expand and grow the organic
6 industry and provide those other alternatives,
7 but I think the essentiality is going to be
8 the key issue that we are going to be grasping
9 and trying to figure out how to deal with.

10 MR. GREEN: Okay. So, then, I
11 would ask, what suggestions do you have? The
12 people who like to formulate it for their
13 customers have expressed their interest. And
14 remember, this is something that is just
15 starting. So, it needs to be given the
16 chance. So, how would you, then, address
17 that?

18 CHAIR RICHARDSON: One more go,
19 Harold.

20 MEMBER AUSTIN: Okay, I'll make it
21 quick.

22 Depending on what the outcome

1 tomorrow on the vote would be, if we do not
2 pass it, then what I would suggest is that you
3 consider repetitioning if it does not pass a
4 Board vote with support letters coming back in
5 under the open public comment period to show
6 us that there truly is a need from that other
7 sector of the organic community.

8 MR. GREEN: Okay. Any other
9 questions?

10 (No response.)

11 CHAIR RICHARDSON: Thank you very
12 much, Rick.

13 MR. GREEN: Okay. Thank you, and
14 thank you for not throwing the hammer.

15 (Laughter.)

16 CHAIR RICHARDSON: The next
17 speaker is Alexis Randolph, and coming up
18 after that is Jackie Sleeper.

19 MS. RANDOLPH: Okay. Good
20 afternoon, everyone.

21 My name is Alexis Randolph, and I
22 am the Certification and Technical Manager for

1 QAI, an organic certification agency in San
2 Diego, California.

3 First, I would like to thank the
4 outgoing Board members for their service to
5 the organic community.

6 I would also like to thank the
7 National Organic Program for continuing to
8 issue guidance documents and instructions that
9 have succeeded in ensuring that all certifiers
10 are applying the standards in the same way.

11 Some of those instructions are
12 based on the work done by the NOSB. And so,
13 I think it is important that the Board hears
14 that this process is working.

15 Now I would like to speak to you
16 about tragacanth gum. We certified one client
17 using this material, and he waited four years
18 to get certified while it was added to the
19 National List. According to him, tragacanth
20 gum, as opposed to the other allowed gums, is
21 what makes his product unique from similar
22 products on the market.

1 He has provided a letter about the
2 necessity of this ingredient, which I have
3 given to Michelle for distribution to the
4 Board. I have been told this company will go
5 out of business if tragacanth gum is removed
6 from the list. This is an agricultural
7 material on 606 and it is not available in
8 organic form.

9 I am going to quickly name off
10 some other materials and inform you if they
11 are being used by certified operators.

12 Gellan gum, used by several
13 companies in non-dairy beverages and similar
14 meal-replacement-type products.

15 Since the question came up
16 earlier, I will just confirm that certifiers
17 do verify the non-GMO status of materials on
18 the list, including gellan gum. Our
19 evaluation questionnaire specifically looks at
20 microorganisms.

21 Peracetic acid, this is very
22 commonly used in sanitation.

1 L-mallic acid, yes, it is used in
2 a wide variety of products from juice to
3 organic flavors to humus.

4 Microorganisms, yes, and I look
5 forward to that discussion later this week.

6 Egg white lysozyme, not that I
7 know of, not by QAI-certified operators.

8 Activated charcoal, yes, all the
9 companies using activated charcoal are making
10 a clear liquid product, such as vinegar or
11 sake.

12 Sodium acid pyrophosphate, yes, it
13 is used in products that require a leavening
14 agent.

15 TSPP, no.

16 Marsala, no.

17 Sherry, no. But there is a
18 natural flavor derived from sherry. If that
19 flavor was to become certified organic, they
20 might need sherry to remain on the National
21 List.

22 My colleague Jessica Walden will

1 give more comments on materials tomorrow.

2 Certifiers have been advised by an
3 NOSB Board member and consumer organization
4 that, if we give comments about materials, we
5 appear no longer impartial and that we are
6 advocating for our clients. This is not true.

7 Certifiers know what materials are
8 being used, and the NOSB does not. So,
9 despite our best efforts, we struggle to get
10 certified operators to make comments on their
11 own behalf. That is why it is very important
12 that you hear from us, and you will continue
13 to hear from me.

14 What I learned from speaking with
15 our clients, such as the one using tragacanth
16 gum, is how important diversity is when it
17 comes to ingredients. If two companies want
18 to make the same type of product, they need to
19 use at least one unique ingredient to set
20 themselves apart.

21 The NOSB reviews the necessity of
22 materials on the list and often makes a motion

1 to remove a material because another one has
2 a similar function. I would like to suggest
3 that the NOSB also consider that diversity of
4 materials on the National List is essential
5 for smaller start-up companies to create a
6 unique product and gain access to the organic
7 market.

8 Thank you.

9 CHAIR RICHARDSON: Thank you,
10 Alexis.

11 Jay?

12 MEMBER FELDMAN: Hi. Thank you
13 for your comments.

14 Can you explain to the Board the
15 process you go through to verify non-GMO
16 materials in processed ingredients?

17 MS. RANDOLPH: Sure. We have a
18 questionnaire that we have completed by the
19 manufacturer of that material. We provide
20 that questionnaire to our certified operator
21 who passed it on to the manufacturer, and it
22 asks questions about the non-GMO status of the

1 material. It also, as I mentioned earlier,
2 looks at microorganisms when necessary.

3 And then, we obtain that
4 documentation. We review that documentation
5 in our office, and the client also retains it
6 onsite. And so, when inspectors go out to do
7 inspections, they will sample through that
8 various documentation and make sure it is
9 still available and current.

10 CHAIR RICHARDSON: Zea?

11 MEMBER SONNABEND: Thanks, Alexis,
12 and I am glad you stepped forward to let us
13 know that your client is using tragacanth gum.
14 It is just unfortunate that he couldn't have
15 written in in time for the public comment
16 period in the docket, and, in particular,
17 mentioned if he had tried the alternatives
18 that were suggested, in particular, gum
19 arabic, which several commenters suggested
20 would work in every situation.

21 MS. RANDOLPH: I don't recall if
22 he included information in his letter about

1 the other gums that he has tried. He verbally
2 let me know that the other gums did not work
3 and why. I think he mentions that briefly in
4 the letter.

5 You know, I just can't express to
6 you enough how difficult it is to get
7 companies to come and give comment or to write
8 in their public comment. We talk to them
9 about it. We put it out in newsletters. We
10 put it out in emails. We see them at trade
11 shows. We speak to them about it.

12 And the majority of them are,
13 quite frankly, just too busy trying to run
14 their business. The gentleman with the
15 tragacanth gum is currently overseas trying to
16 get an export market.

17 Until I called him up and told him
18 how serious this was, he had absolutely no
19 idea that he could go out of business. And
20 that is what he is telling me will happen.

21 So, I really can't speak entirely
22 on his behalf. All I can do is just let you

1 know that there are stories behind every
2 material that you vote on. And it is
3 difficult to bring those forward to you. So,
4 as much as you can also do to reach out to the
5 community to learn those stories, I think the
6 community would really appreciate that.

7 CHAIR RICHARDSON: Harold?

8 MEMBER AUSTIN: Thank you, Madam
9 Chair.

10 Alexis, thanks for coming and
11 giving the presentation. To step up and speak
12 out on behalf of some of those entities that
13 you guys are certifying or that are not
14 willing to come up here and do it for
15 themselves, all you certifying agencies that
16 come here and provide this type of information
17 to us, it is invaluable. It really helps us
18 provide a working foundation to put some
19 stability and a little bit of balance into the
20 things that we are hearing and we are looking
21 at.

22 And I can't express enough how

1 gratified I am that you did take the time and
2 step up. And continue to do so.

3 The one thing I would challenge
4 QAI and everybody else that goes out and works
5 with these clients and accounts is there has
6 got to be a mechanism and vehicle that we can
7 utilize to get the message to them. As we
8 move into this next huge round of sunset
9 reviews for the 2016 and the 2017 materials
10 and substances, they have got to get engaged.
11 We need to hear from them because we need to
12 know if something is important to them.

13 I mean, we are dealing with the
14 issues at hand today, but this is just the
15 stepping stone for the next 18 months. And
16 this is just the start of a lot bigger
17 picture. So, we are going to need a lot of
18 help to try to get the information out to
19 those guys and get them to give us some public
20 comment back.

21 MS. RANDOLPH: Yes, we will keep
22 trying. Thank you.

1 CHAIR RICHARDSON: Thank you very
2 much.

3 The next speaker is Jackie
4 Sleeper, and the last speaker of the afternoon
5 following that will be Phil LaRocca.

6 MS. SLEEPER: Good afternoon.

7 My name is Jackie Sleeper, and I
8 am the Farms Program Technical Specialist for
9 the Oregon Tilth Certified Organic Program.

10 Thank you, NOSB Members, for your
11 service and opportunity to share our comments.

12 Today I am addressing the
13 assessment of soil conservation practices
14 discussion document from the CAC Subcommittee.

15 Oregon Tilth appreciates the NOP
16 and NOSB bringing attention to the importance
17 of soil health and organic systems. Healthy
18 soils are the foundation of organic
19 agriculture. Organic standards acknowledge
20 this, requiring farmers to maintain or improve
21 the physical, chemical, and biological
22 condition of soil and minimize soil erosion.

1 At the prior NOSB meeting, Oregon
2 Tilth's Education Director and Organic
3 Specialist for the USDA NRCS, Sarah Brown,
4 described our national partnership with their
5 agency. The partnership recognizes many
6 shared goals between the NRCS and organic
7 standards regarding natural resources
8 conservation.

9 Our work together helps us promote
10 a more conservation-minded approach to soil
11 management, assessment, and recommended
12 practices. And the NRCS uses a variety of
13 soil assessment tools and erosion
14 classifications that certifiers and their
15 inspectors may not be aware of.

16 Evaluating soil health requires a
17 comprehensive and practical approach. The
18 OTCO Program evaluates diverse farm operations
19 across the U.S. and North America. We see
20 firsthand that soil conservation is as diverse
21 and multifaceted as organic farming itself.

22 Successfully managing healthy soil

1 depends upon a wide variety of farm-specific
2 factors, such as region, field locations,
3 cropping systems, and climate conditions. We
4 believe there isn't a one-size-fits-all
5 approach in determining soil quality and
6 health.

7 Overreliance on quantitative
8 assessment tools, such as RUSLE2, is not a
9 solution. Evaluating soil health must occur
10 over time and should involve a variety of
11 indicators, including visual assessment and
12 simple quantitative tools, such as soil tests
13 measuring organic matter. We emphasize the
14 value of qualitative and visual assessment.

15 Organic certification must remain
16 an accessible and valuable service for all.
17 OTCO believes organic standards must be easily
18 understood by certified farmers and clearly
19 verifiable by inspectors in the field.

20 While upholding the standards, we
21 must also ensure organic certification is not
22 unnecessarily complex or too costly. The key

1 will be focusing on farms where soil
2 conservation is most at risk. This focuses
3 compliance/accountability where it is most
4 needed; for example, soil erosion that
5 threatens both soil health and water quality.

6 The discussion document is a good
7 first step in this complex conversation. We
8 can move the conversation forward in the
9 following ways:

10 First, we need a clearer picture
11 of the current situation. How many concerns
12 or non-compliances are identified by
13 certifiers regarding soil management? What is
14 their basis for soil conservation assessment
15 and findings? What issues are being
16 identified by NRCS when working with certified
17 organic farms?

18 USDA should work to increase
19 coordination and consistency across NOP
20 certification and NRCS conservation compliance
21 to identify and resolve concerns. For
22 example, how might preexisting assessments or

1 classifications, such as highly-erodible
2 lands, support certification?

3 Next, we need to carefully
4 consider what tools or practices certifiers
5 should use to monitor soil health in ways that
6 are sound and sensible. The NOP should engage
7 certifiers, IOAS, organic farmers, and NRCS to
8 inform guidance.

9 Finally, further training and
10 guidance from the NOP should help clarify
11 expectations regarding soil conservation.
12 Certifiers would benefit from training on how
13 to identify high-risk operations and address
14 non-compliance. This will improve quality and
15 consistency in certification.

16 OTCO supports setting high
17 standards for practices and outcomes, informed
18 by an ethic of continuous improvement. As an
19 organization founded on the importance of good
20 tilth, we can resonate with Wendell Berry's
21 statement, "What I stand for is what I stand
22 on." Simply put, Oregon Tilth believes

1 building soil health is an investment in our
2 future.

3 Thank you.

4 CHAIR RICHARDSON: Thank you.

5 Questions?

6 (No response.)

7 Thank you very much.

8 MS. SLEEPER: Thank you.

9 CHAIR RICHARDSON: Phil next.

10 MR. LaROCCA: As the last speaker,
11 I will try to make this as quick and painless
12 as possible.

13 My name is Phil LaRocca. I am the
14 owner and winemaker of LaRocca Vineyard, where
15 we produce a 100-percent USDA-certified
16 organic wine. I am also Chairman of the Board
17 of Directors for CCOF.

18 Last June I had a conference call
19 with Miles, and we discussed several different
20 organic issues, one being GMOs. And I said,
21 "Miles, we need to do something to protect the
22 organic integrity of both the organic farmer

1 and the organic consumer."

2 And Miles responded to me that he
3 really didn't get a whole lot of complaints
4 and he didn't really see that organic farmers
5 were being damaged by this.

6 So, knowing that Miles and I were
7 going to be guest speakers at an event in
8 Southern California, I took the challenge on.
9 I have to admit, when I started, it was a
10 little bit difficult because a lot of farmers
11 didn't want to talk to me for fear, if
12 something came up, they would lose their
13 certification. As a farmer myself, I totally
14 could empathize with that. This is your
15 livelihood. Your livelihood was at stake.

16 However, I kept beating the door
17 down. And with the help of CCOF, several
18 anti-GMO groups, the pro-labeling groups, and
19 several Midwest farmers, I compiled about --
20 what do you think, Miles? -- about two inches
21 of paperwork. And I have another inch-and-a-
22 half that I meant to present to him at this

1 meeting. However, I left my house at three
2 o'clock in the morning and I forgot, but I am
3 going to mail it to him.

4 So, I want to thank this Board for
5 their efforts in keeping GMOs in the
6 forefront. We cannot give up. Let's face it,
7 the USDA is not friendly to this issue, but it
8 is an important issue to our organic culture,
9 our organic community. Again, not just to the
10 organic farmer, but to the organic consumer.
11 So, please, please keep up the good work and
12 keep up the fight.

13 Also, as the largest producer of
14 organic wine as a food ingredient, you really
15 know what you should take off the list if I
16 say it correctly, marsala and sherries,
17 because they can easily be produced
18 organically.

19 Thank you very much.

20 CHAIR RICHARDSON: Thank you,

21 Phil.

22 Questions?

1 (No response.)

2 Thank you, Phil.

3 MR. LaROCCA: Okay. Thank you.

4 CHAIR RICHARDSON: This is turning
5 into a marathon day, and I thank everyone for
6 sitting there and keeping going.

7 I would like to move straight into
8 the Materials Subcommittee report back to the
9 whole Board. And as we move into that, I
10 would like to ask Dr. Brines if she would
11 cover the conflict-of-interest issue, so that
12 we don't need to look at it again for the rest
13 of the week. If you could address that now?

14 Thank you.

15 DR. BRINES: Thanks, Jean.

16 I don't have any specific text
17 prepared, but this is the point of the meeting
18 where any of the Board members who have a
19 conflict of interest would be able to state
20 that on the record. I suggest, just for
21 efficiency, to address any of the topics that
22 the Board might be voting on at this time.

1 Thanks.

2 CHAIR RICHARDSON: And the
3 audience out there should, of course, be aware
4 of the fact that, in preparation for this
5 meeting, we had a document circulated to us by
6 the NOP inquiring as to whether or not there
7 were any conflicts of interest of any Board
8 members regards any of the materials that were
9 being considered at this meeting, and there
10 were none that I am aware of.

11 Is that correct, Lisa? Right? No
12 conflicts were identified on paper, correct?

13 DR. BRINES: That is my
14 understanding, correct. Yes.

15 MEMBER SONNABEND: Although I know
16 that is our procedure for doing things, I do
17 like to publicly make a disclosure to that
18 effect. So, that being said, I do work for a
19 certification organization that may or may not
20 certify products that contain any of the
21 substances that we are discussing here today.
22 And as a small farm, I may or may not use any

1 of the substances we are discussing here
2 today. But that is the extent of my interest.

3 CHAIR RICHARDSON: Thank you.

4 Okay. Before we have Calvin make
5 his first comments, I just want to be sure
6 that we understand, as we begin to go into the
7 parts of the meeting which will deal perhaps
8 with motions, just to bring to your attention
9 that the NOSB is an odd sort of an
10 organization, that in terms of parliamentary
11 procedures and other kinds of procedures, we
12 have an interesting mix.

13 We have the OFPA, which says that
14 all of the votes, all of the motions are
15 supposed to be two-thirds.

16 We have a Policy and Procedure
17 Manual that has been developed over the years
18 with public input which has a combination,
19 incorporated by reference the OFPA voting, but
20 also adds some Robert's Rules of Order
21 language.

22 Then, we have Robert's Rules of

1 Order, which we kind of follow most of the
2 time.

3 And then, we have policies which
4 are periodically promulgated by the NOP, such
5 as the new sunset procedures or the present
6 ruling that we can't make annotations at
7 sunset, which are like amendments, as you
8 know, and that substantive changes or
9 amendments cannot be voted at the public
10 meeting if they have not been in The Federal
11 Register, and therefore, had the opportunity
12 to be seen by the public.

13 We also use tradition, and there's
14 lots of you here that have been part of that
15 tradition over the years.

16 And then, finally, of course, the
17 last type of ruling which you might have to
18 face is rulings from the Chair. And, of
19 course, the Chair can be appealed.

20 So, as we go into the discussions
21 starting today and going through the next two
22 days, tradition suggests that we should try to

1 reach consensus, where possible, and that we
2 be flexible and considerate in our actions
3 with our colleagues on the Board.

4 And if you have a motion, please
5 make it clear and concise. I need to
6 understand it, so that I will be able to know
7 how to deal with it.

8 And if it is obvious that you
9 don't have the votes, please be clear and
10 concise, so that your comments and your
11 position are very clearly put on the record
12 without belaboring or repeating your points.

13 Pursuant to the Policy and
14 Procedure Manual, the Chair of each
15 Subcommittee will be presenting the
16 Subcommittee's written motion to the full
17 Board, and that motion comes from the
18 Subcommittee with a second.

19 So, I now turn over at this point
20 to the Materials Subcommittee, to Dr. Walker.

21 MEMBER WALKER: Thank you, Madam
22 Chair.

1 We have two items. One item is a
2 non-voting item, terminology and excluded
3 methods by Zea, and one proposal to vote on
4 2014 research priorities. And we hope to vote
5 on that particular today.

6 And we will start off with Jay on
7 2014 research priorities.

8 MEMBER FELDMAN: Thank you, Mr.
9 Chair.

10 I'm sorry, did you see the slides
11 in that folder in the Dropbox?

12 Okay, just some background. As
13 you all may know, the NOSB every year puts
14 together a proposed research agenda. And it
15 does this by asking each Committee to generate
16 priorities and, then, those priorities are
17 discussed within each Subcommittee and, then,
18 handed over to the Materials Committee to sort
19 of put them together. So, the work that is
20 contained in this presentation is the result
21 of the work of all the Subcommittees of the
22 NOSB.

1 The first slide, which you will
2 see in a minute, is one on background. A
3 recommendation for a framework to set research
4 priorities was approved at the NOSB meeting in
5 May 2012. That is when we first started this
6 process.

7 The priorities from the previous
8 year of NOSB deliberations are presented at
9 each fall meeting. Each fall, after
10 recommendations are finalized by the NOSB, the
11 Chair of the Board will make sure to send to
12 the primary organic research funders, such as
13 NEFA, ARS, NRCS, and private foundations and
14 other funders that may be identified. All NOP
15 staff, NOSB members, stakeholders can use the
16 list for inspiring appropriate research.

17 The criteria that we adopted back
18 in 2012 includes the following:

19 Persistent and chronic or
20 perennial topics of debate and need. So, the
21 first criteria is persistent and chronic.

22 The second criteria is

1 challenging.

2 The third criterion,
3 controversial. Topics on which there are
4 widely-differing perspectives or for which
5 there have been close NOSB votes.

6 Third is nebulous. The research
7 need is hard to identify, but the organic
8 agriculture need is clear; for example,
9 improved methods of weed control.

10 The third is lacking in primary
11 research, that is, topics for which there is
12 no active research being conducted primarily
13 relating to the criterion OFPA for review of
14 materials.

15 And then, finally, relevant to
16 assessing the need for alternative cultural,
17 biological, and mechanical methods to
18 materials on the National List.

19 And that list was generated
20 through a public process in which we received
21 public input, that the NOSB received public
22 input.

1 Okay. So, there you see them.

2 Thank you.

3 Next. Just to give you a little
4 bit of background or remind you that, back in
5 2012, on the left side there you see the
6 research priorities that were adopted by the
7 Board: whole farms systems research,
8 evaluation of copper sulfate for rice,
9 evaluation of antibiotics, evaluation -- or
10 alternatives, sorry -- evaluation of
11 genetically-modified vaccines, organic
12 aquaculture, methionine alternatives,
13 carrageenan.

14 And then, in 2013, the list grew a
15 little bit. Whole farm systems is carried
16 over. Alternatives for antibiotics again,
17 evaluation of GMO, vaccines, methionine
18 alternative. They still remain high
19 priorities. We added organic aquaculture,
20 aquatic biodiversity, herd health, pastured
21 poultry, and salmonella, commercial
22 availability assessments, consumer demand,

1 fate of genetically-engineered material and
2 compost, and reduction of genetically-modified
3 content of breeding lines.

4 Now this year this is the list we
5 came up with. And I think this time we tried
6 not to include what was on previous lists, to
7 some extent at least.

8 The first one being alternatives
9 to Bisphenol A, BPA; plant disease management;
10 soil-building practices; mitigation measures
11 for residues in composts; Organic No Till; how
12 contaminated with GMOs is at-risk seed;
13 research on integrity of breeding lines and
14 foundation seed, and ways to mitigate small
15 amounts of genetic presence in breeding lines;
16 risk reduction from off-target exposure to
17 non-permitted materials; mastitis; parasitism;
18 pneumonia, and plant extracts.

19 And these are comments we
20 received, not that many, but we received
21 comments from three individuals and eleven
22 organizations. They are qualitatively very

1 good comments.

2 Beyond Pesticides, Organic Center,
3 MOSAS, Food and Water Wash, Consumers Union,
4 Cornucopia, CCOF, the National Organic
5 Coalition, the American Chemistry Council, PCC
6 Market, Natural Markets, and the Alliance for
7 Natural Health.

8 The comments went like this: most
9 commenters supported current and proposed
10 priorities.

11 Three singled out BPA alternatives
12 to support, also warning about problems and
13 alternatives. One said BPA is safe.

14 Others singled out for support
15 were research on seed purity; integrity of
16 breeding lines and foundation seed' and
17 providing guidance on how to reduce unwanted
18 traits in breeding lines; whole farm systems;
19 research; pastured poultry, especially to
20 determine best breed for pasturing and flavor;
21 evaluation of genetically-modified vaccines;
22 alternatives to antibiotics; risk reduction

1 from off-target exposure to non-permitted
2 materials.

3 Continuing in response -- let's
4 see -- in response to previous identification
5 of consumer expectations as a research
6 priority, Consumers Union submitted the
7 information which you heard about earlier on
8 two surveys it performed. Results include 69
9 percent of consumers think it is important to
10 avoid artificial ingredients. I am not going
11 to repeat these since everybody in the room
12 heard these, but we heard from Consumers Union
13 on the survey.

14 Comments. Let's see, the next
15 one. Let me go on with that. Okay. Comments
16 on Subcommittee priorities. The following
17 were each identified by one consumer as non-
18 priority issues: fate of GMOs in compost;
19 organic aquaculture; aquatic biodiversity;
20 commercial availability assessment; consumer
21 demand; mitigation of residues in composts;
22 risk reduction from off-target exposures in

1 prohibited substances, or to prohibited
2 substances.

3 And then, additional priorities,
4 the following topics were suggested by more
5 than one commenter: alternatives to hydrogen
6 chloride for cottonseed preparation;
7 degradation impacts of biodegradable bio-based
8 bioplastic mulch; chlorine alternatives;
9 chelating agents impacts, and remediation of
10 persistent herbicides in compost.

11 And then, additional priorities
12 were suggested by one commenter: how soil
13 health affects plant health; mitigation of
14 negative impacts of tillage; alternative
15 mulching materials; herbal medications for
16 animal infections, and sulfurous acid issues.

17 And this is our last comment from
18 the Organic Center: requested that NOSB draft
19 a letter to USDA requesting mandatory organic
20 representation on USDA Research Boards and
21 Committees.

22 So, Mr. Chair, that sums it up, I

1 hope.

2 MEMBER WALKER: Thanks, Jay.

3 MEMBER FELDMAN: Thank you.

4 MEMBER WALKER: I think at this
5 point we will open it up to the Board for the
6 discussions. Am I right, Madam Chair?

7 CHAIR RICHARDSON: Yes.

8 Nick?

9 MEMBER MARAVELL: I just have --

10 CHAIR RICHARDSON: Your

11 microphone.

12 MEMBER MARAVELL: I'm sorry. I
13 just have one very minor point which I should
14 have brought up earlier. Under the research
15 on integrity of breeding lines and foundation
16 seed, and ways to mitigate small amounts of
17 genetic presence in breeding lines. That is
18 obviously small amounts of genetically-
19 engineered presence, because they are all
20 going to have genetic material.

21 MEMBER FELDMAN: Yes, I realize.

22 I mean --

1 MEMBER MARAVELL: So, I didn't
2 know whether or not --

3 MEMBER FELDMAN: That should be
4 clarified.

5 MEMBER MARAVELL: -- that needs to
6 be. It is clear if you read down through the
7 explanatory text. But, given that that is the
8 heading, it is a very minor point.

9 MEMBER FELDMAN: Thank you.

10 CHAIR RICHARDSON: Mac?

11 MEMBER STONE: I have a question
12 for Miles or maybe Betsy. How is this
13 document carried further into USDA or into the
14 research community or communicated out, what
15 we have come up with here?

16 MR. MCEVOY: We do things at the
17 National Organic Program. I am going to let
18 Betsy, though, give a more fuller response of
19 how that aligns with Secretary Vilsack's
20 Organic Guidance.

21 MS. RAKOLA: The way that we have
22 shared the NOSB research priorities in the

1 past is to pass those to the Research Project
2 Action Team of the Organic Working Group,
3 which is led by Mat Ngouajio of the National
4 Institute of Food and Agriculture. Matt
5 oversees the Organic Research and Extension
6 Initiative, and he shares the document with
7 that Committee, with all the members of the
8 Committee, and they review it when providing
9 responses to the NOSB.

10 CHAIR RICHARDSON: Thank you very
11 much.

12 MR. MCEVOY: So, just to add to
13 that, it is very important to USDA to get this
14 list of priorities, and it is shared widely,
15 and it has resulted in a number of different
16 research projects being supported by USDA.

17 CHAIR RICHARDSON: Thank you,
18 Miles.

19 Others? Colehour, you look
20 like -- yes?

21 MEMBER BONDERA: Yes.

22 CHAIR RICHARDSON: Thank you.

1 MEMBER BONDERA: Thank you.

2 Since I am not a member of this
3 Subcommittee, I would like to request that you
4 expand a little bit on your comment, Jay,
5 regarding -- I don't know how to characterize
6 it, except for you said something along the
7 lines that the previous year's research
8 priorities were not to be included in this
9 year's, or something like that. And I want to
10 understand a little better why and what if
11 they still are ongoing needs, you know, why
12 not to include them.

13 MEMBER FELDMAN: I think I am
14 correct in saying that. We were trying to
15 separate the ongoing from the new ideas that
16 emerged as a result of the last year's work.
17 I mean, that is what we decided to do, I
18 guess.

19 CHAIR RICHARDSON: Colehour, a
20 followup?

21 MEMBER BONDERA: Yes. I guess I
22 think a little bit more understanding, just

1 for the sake of -- I guess I also want to
2 understand the prioritization component of
3 this process because it wasn't entirely clear
4 to me where the priorities are or how
5 something -- what that use of that word in
6 your description means.

7 Because I think, like I said, if
8 something wasn't done in 2012 or 2013, you
9 know, does it automatically carry over and/or
10 is it characterized as, well, these are still
11 priorities because they weren't addressed?
12 And how does somebody getting this list know
13 what the main priorities are? I think, for
14 me, those things are combined.

15 I wonder if you could address that
16 further. Thank you.

17 MEMBER FELDMAN: I'll turn it over
18 to Zea. But just to say, you know, this comes
19 from all of the Subcommittees. So, you know,
20 we are trying to present the best effort of
21 every Subcommittee in terms of its priority
22 items. Obviously, when you bring those all

1 together to one list, the Materials Committee
2 didn't prioritize that.

3 CHAIR RICHARDSON: Zea?

4 MEMBER SONNABEND: We did make the
5 decision because we had sort of a funny cycle,
6 in that it wasn't a full year because of the
7 government shutdown. So, we actually just
8 approved last year the 2013 at the last
9 meeting.

10 But we did decide that we would
11 focus on new ones for this cycle, while still
12 publishing the list of the previous ones. And
13 maybe we could have been a little clearer in
14 saying that we consider all these previous
15 ones still valid, but we are adding to it with
16 our newest ones from the past cycle.

17 Now, in terms of prioritizing, I
18 think, you know, we asked the Subcommittees to
19 prioritize their own selves, and we got
20 various response to that. Some had real
21 priority ranking systems, and other
22 Subcommittees just turned them all over to us.

1 And we could do a little better if
2 we started a little earlier in the
3 Subcommittees. And so, we should work on that
4 internally, to try to get a more clearer
5 picture of it, because we were very rushed at
6 the end. Otherwise, the Materials Committee
7 themselves would have had more time to talk
8 about it and maybe make a rank with the
9 different Subcommittees, but we didn't have
10 time.

11 CHAIR RICHARDSON: Thank you for
12 that clarification. That is an important
13 point, to get started on it earlier, and to
14 get clarity as to the extent to which research
15 priorities have dropped off the list or if, in
16 fact, they have just been carried forward and
17 cumulative.

18 MEMBER SONNABEND: We don't
19 consider any of them dropping off the list.

20 CHAIR RICHARDSON: Any other
21 questions, comments?

22 (No response.)

1 Are we ready to vote on this item?

2 MEMBER WALKER: Madam Chair, we

3 are.

4 CHAIR RICHARDSON: Thank you, Dr.

5 Walker.

6 We will start the voting with Dr.

7 Taylor.

8 MEMBER TAYLOR: Yes.

9 MEMBER THICKE: Yes.

10 CHAIR RICHARDSON: I'm sorry, you

11 have to have Lisa write.

12 What? Sorry?

13 DR. BRINES: Just a clarification.

14 Do we have a motion and a second before

15 commencing with the voting?

16 CHAIR RICHARDSON: You want me to

17 repeat it? Or do you want to repeat the

18 motion?

19 DR. BRINES: Yes.

20 MEMBER WALKER: Our motion is to

21 accept the 2014 research priorities.

22 CHAIR RICHARDSON: And the second

1 from the Subcommittee was? Jay?

2 MEMBER FELDMAN: Second.

3 DR. BRINES: Okay.

4 MEMBER TAYLOR: Yes.

5 MEMBER THICKE: Yes.

6 MEMBER BONDERA: Yes.

7 MEMBER FAVRE: Yes.

8 MEMBER DICKSON: Yes.

9 VICE CHAIR FOSTER: Yes.

10 MEMBER STONE: Yes.

11 MEMBER FELDMAN: Yes, ma'am.

12 MEMBER AUSTIN: Yes.

13 MEMBER FULWIDER: Yes.

14 MEMBER SONNABEND: Yes.

15 MEMBER WALKER: Yes.

16 MEMBER MARAVELL: Yes.

17 CHAIR RICHARDSON: And the Chair

18 votes yes.

19 VICE CHAIR FOSTER: 15-0.

20 MEMBER WALKER: Okay. Now the

21 next item and the last item is a non-voting

22 item, an item that has generated a lot of

1 interest among our family. It is excluded
2 methods terminology.

3 Zea will lead that discussion
4 document for us.

5 MEMBER SONNABEND: Okay. Now that
6 it is five o'clock in the afternoon, we are
7 ready for a nice, easy subject to end our day.

8 (Laughter.)

9 While Michelle is pulling up the
10 slides, I guess I will start with the
11 background.

12 And I guess, do I call to you for
13 next slide? Oh, you're bringing me a clicker?
14 Okay.

15 So, I hope all of you who have
16 followed this subject, you all are familiar
17 with definition that is in the federal law for
18 excluded methods. This definition was written
19 in 1995, when biotechnology was far less
20 advanced than it is today, and it was best at
21 the time to encompass all of the different
22 possible biotechnology genetic engineering

1 things. But it has become outdated over the
2 years. And so, we are attempting to clarify
3 it.

4 And in order to clarify it, we
5 need to develop a structure that we can sort
6 of use to get it down to the nitty-gritty.
7 So, we proposed a first discussion document a
8 year ago now -- was it? -- or even longer
9 because of a cancelled meeting. But we had a
10 first discussion document in which we examined
11 all of the terms that were in the definition
12 that we have now.

13 And then, we also examined some
14 other terms that had come to our attention
15 from the community. And then, we asked the
16 community to weigh-in on any additional terms
17 we had missed and what should we do about this
18 all. Should we clarify the definition or not?

19 So, we got back a number of
20 comments, and there is a pretty full
21 discussion of this in our second discussion
22 document, of what the commenters said.

1 We got people that were very
2 concerned that we might go for a rule change
3 and try to open up the rule to change the
4 definition, which then opens up the rule to
5 other undesirable consequences. And so, we
6 discussed this in some detail, and we decided
7 that a guidance would be the best way to go.

8 And so, we are making that clear
9 in this discussion document, that guidance is
10 the way we are heading.

11 Okay. We put out a proposal of
12 different other definitions and principles
13 that were suggested. And I am not going to go
14 into the long part about it now. You can all
15 look at it in the actual document.

16 But we had ethical criteria,
17 operational criteria, all the new terms that
18 had come to us which we gave some preliminary
19 definitions of, but none exhausted.

20 And then, we went into the
21 somewhat arcane discussion of how this would
22 fit into a process-based rule when, in fact,

1 in the U.S. so far it has mostly been product-
2 based assessments of GMOs, where each
3 particularly new strain that wants to be
4 introduced goes through its own so-called
5 review or, in our opinion, lack of review, and
6 just hits the market without really a very
7 comprehensive approach to any of it.

8 And yet, a lot of other types of
9 genetically-engineered things, if they are not
10 a straight crop variety, don't even have to be
11 evaluated in order to come into market. And
12 so, GMOs are creeping in at all levels of our
13 food supply.

14 Okay. We posed several questions,
15 basically, thinking, you know, asking if
16 people wanted guidance, if people thought that
17 the Cartagena Protocol definition was a good
18 way to go, if process-based or product-based,
19 et cetera.

20 We received 19 specific comments.
21 And I have given the group's -- whoops, I
22 forgot to push the button; process or product

1 -- 19 specific comments. This does not
2 include the dozens and dozens of people who
3 wrote in, you know, "Just keep GMOs out of our
4 food." I only counted up the ones that
5 actually gave input on the discussion document
6 itself. And these are generally them.

7 Most commenters were in favor of
8 clarifying excluded methods through guidance.
9 A few of them didn't really want to rush into
10 it. They thought we should survey everybody
11 about everything first.

12 But most commenters agreed that
13 the process-based approach was more consistent
14 with the rule and the needs of the organic
15 community. Several of them acknowledged that
16 a process-based standard could incorporate
17 some quantitative tools for assessment of
18 compliance.

19 Okay. So, that is what I just
20 read.

21 Many of them supported the
22 Cartagena Protocol definition, but some

1 concern about the language concerning beyond
2 the taxonomic family, which is the contentious
3 portion of the cell fusion decision, which
4 will be one of the terms that will be coming
5 up in the future discussions over the subject.

6 Okay. Several people suggested
7 some more new terms that we overlooked or that
8 came out in the interval between the time we
9 threw out the last round of terms. So, we see
10 they are coming out all the time.

11 And some of them, if you read the
12 very brief descriptions I gave, are very
13 complicated techniques and which are getting
14 sneakier and sneakier in the ways that GMOs
15 are entering our food supply.

16 Several people pointed out there
17 is a somewhat gray area between a process and
18 a product, and, you know, the intertwined
19 thing such as a GMO technique was used to
20 create a variety, but, then, all traces of the
21 GMO are then gone from it. And so, you
22 couldn't even test it as being a GMO variety.

1 And things like that are all things that we
2 are going to have examine once we get an
3 infrastructure in place to do this.

4 Certifiers, bless their heart,
5 pointed out that they need a lot of training
6 in order to review anything that we come up
7 with because it is now always apparent how to
8 even tell where the GMOs are, much less how to
9 determine if a particular technique would be
10 allowed or not allowed.

11 And then, last but not least,
12 survey data is badly needed on the extent of
13 excluded methods in organic contamination
14 occurring in the field and all of the things
15 relating to that and relating to the economic
16 loss that farmers experienced from these
17 consequences.

18 So, our intention is to remain
19 visible in the organic community in working on
20 genetically-engineering topics in all forums.
21 At the next meeting we will be providing GMO
22 prevention strategy guidance suggestions, as

1 was indicated in the NOP memo.

2 We very likely will post this
3 exact same document again or something very
4 similar to this with just a few minor
5 modifications. Because we realize that it is
6 not a long enough period of time, one month,
7 to digest all of this very complicated
8 information and be able to give us some
9 valuable input.

10 So, you can forward to this again
11 in six months, but in the meantime anyone is
12 welcome to turn in comments to the NOP at this
13 email on the screen,
14 nop.guidance@ams.usda.gov. It may or may not
15 get forwarded to us. And if you do so, you
16 will also want to hold it and post it to The
17 Federal Register the next time the docket
18 opens.

19 But we appreciate any further
20 input on this at anytime, and we also
21 encourage you to pass this on to all of your
22 colleagues, particularly in the seed industry,

1 plant breeders, other GMO experts, because we
2 would like to hear from a lot more people than
3 19 about how we are going to approach this
4 important subject.

5 Thank you.

6 MEMBER WALKER: At this point we
7 open it up for discussion by the Board. Any
8 questions for the presenter Zea?

9 (No response.)

10 MEMBER SONNABEND: Nice to see the
11 Board so engaged on this.

12 (Laughter.)

13 MEMBER STONE: So, this is a
14 moving target at best. How do we ever draw a
15 line in the sand, given the rapid change of
16 technology and interest, and whatnot? I don't
17 see how we come to some conclusion versus some
18 process of determining a conclusion. Does
19 that make sense?

20 MEMBER SONNABEND: Well, we are
21 working on the process now. What I envision
22 is adopting a definition such as Cartagena

1 Protocol with or without some modifications
2 for our own use; agreeing that we are going to
3 do process-based reviews, starting with a
4 chart similar to the one I presented a portion
5 from FiBL that they submitted in their last
6 public input.

7 And I think we would start with
8 the very most obvious things that we all agree
9 are, you know, recombinant DNA and never would
10 be allowed in organic. Once we have that
11 structure going and the way to modify and
12 change it and review new items, we will tackle
13 the ones that the community is more divided
14 on, you know, maybe not one at a time, but
15 just a few at a time.

16 Because like certain techniques,
17 like cell fusion, for instance, the type of
18 cell fusion we have talked about in the past,
19 or at least the seed industry has talked about
20 in the past, is primarily for Brassica hybrids
21 and the process occurred 30 years ago, but now
22 it has come down for many generations in

1 breeding, and you can't tell which hybrids are
2 produced that way because it is not out there
3 yet.

4 But there are other types of cell
5 fusion that are now being used, like this
6 fast-track thing to create the plum, where
7 they insert it into the plum, they get a
8 quicker-bearing plum, and once the plum starts
9 bearing, they take it out again. And so, that
10 is clearly something we could head off at the
11 pass, you know, before anyone starts growing
12 these, but it is still cell fusion.

13 And we just have to get into the
14 weeds and sort out this terminology. We can't
15 do that until we have an overarching
16 definition that works and doesn't have such
17 unclear terms in it as the one that is in the
18 law now, and until we work through the
19 procedure of how we are going to make changes
20 and modify the list.

21 MEMBER STONE: And then, we fight
22 real-time information versus the glacier

1 moving through the python of getting it
2 through NOP and back out. So, how do we think
3 about that part of it?

4 MEMBER SONNABEND: Well, guidance
5 is fast compared to rulemaking. And besides,
6 there will be NOSB recommendations along the
7 way that people can refer to when they are in
8 process.

9 CHAIR RICHARDSON: Could I ask a
10 question, Zea? Do you think that -- you
11 didn't get a huge amount of really focused for
12 this, I noticed, although plenty of passion
13 and some in-depth. But do you think you are
14 getting a broad enough input from a range of
15 all stakeholders at this point?

16 MEMBER SONNABEND: No, which is
17 why I want to put it out again. We have
18 started the process of like organizing some
19 discussion group/focus group things at some of
20 the big organic conferences this winter. I
21 imagine we will have one at Ecofarm and
22 possibly Organicology, which is the West

1 Coast, what I know about it. And I hope that
2 other regions would do the same, so that we
3 can get a lot of regional input on the
4 subject.

5 Things that happen during apple
6 harvest don't happen as well for me as things
7 that happen during the winter, being a farmer.
8 So, for the last discussion document, I was
9 able to reach out directly a lot more to plant
10 breeders than I have done this time, for
11 instance. But that is why we are going to
12 have another round at this.

13 MEMBER BONDERA: Okay. I just
14 have a quick comment in relation to what you
15 were just talking about because I have
16 commented this informally to Jean, and I think
17 that I don't know or if it can go anywhere.

18 But I wonder if you guys and/or we
19 should consider a listening session on the
20 subject, so that people from all around can
21 participate.

22 MEMBER SONNABEND: Maybe Miles

1 could talk about if that is possible.

2 MR. McEVOY: Well, I am glad that
3 this is going on, this discussion about
4 excluded methods, as it is an old definition
5 and it makes it difficult for both the NOP and
6 certifiers to make the determination because
7 the definition itself has some areas that are
8 hard to reconcile.

9 We tried to clarify that in the
10 cell fusion policy memo that we put out a
11 couple of years ago that outlined some of
12 those areas that are hard to reconcile and
13 figure out a path forward.

14 And the GMO vaccines is another
15 area that is very challenging. And we are not
16 talking about GMO vaccines, but I do have a
17 thing to clarify GMO vaccines for tomorrow,
18 when we get to that, right? Livestock is
19 tomorrow? Thursday. Okay, good.

20 So, I am glad this effort is going
21 on. I guess my question is guidance has
22 utility to help provide clarification on how

1 to comply with the existing regulations, but
2 it is not the regulations. And it does take
3 a long time to do guidance. It is basically
4 the same amount of resources that we have to
5 put into doing guidance as doing any kind of
6 rulemaking, except it is a little bit less,
7 but it is the same process.

8 We do Draft Guidance, get the
9 comments, and then do Final Guidance. But it
10 still has to go through a significant amount
11 of clearance, legal clearance, Departmental
12 clearance. And at the end of the day you have
13 guidance, which you can't take regulatory
14 action on guidance. Guidance is just a way to
15 comply with the existing regulations. So, I
16 think you have to really think about, is that
17 the best mechanism for clarifying these areas
18 or updating the excluded methods definition?

19 Rulemaking has its own challenges
20 because, then, it basically does open up that
21 definition for changes. So, that is always
22 something to consider very, very carefully,

1 whether or not you want to do that.

2 The other mechanism is we have the
3 policy memos. That is how we clarified things
4 on cell fusion. Policy memos are a lot easier
5 for us to develop and implement. And that is
6 basically our interpretation of the existing
7 regulations, but it goes a lot faster than
8 going through Draft Guidance and Final
9 Guidance. The thing that is missing in doing
10 a policy memo is we don't do the public
11 comment process, but the NOSB can do a public
12 comment process in terms of your development.

13 And then, the final mechanism that
14 may be something that you should really look
15 at is instructions to certifiers because that
16 is something that, if you are trying to
17 determine what's in/what's out, and the
18 existing definition of excluded methods
19 already has the regulatory language that you
20 need, the instructions can really clearly give
21 certifiers and the community, but mostly
22 certifiers, the tools they need to clarify

1 what is in and out in terms of what is
2 excluded methods or GMO or not.

3 The other thing that seems to be
4 very important to look at is what is really
5 the industry standard is the OMRI decision
6 tree on GMOs. I am sure you have looked at
7 it. But that might be a way of getting into
8 this conversation more deeply. How far back
9 in the process do you go to determine whether
10 something is excluded or not? How many steps
11 back in the process?

12 CHAIR RICHARDSON: Zea?

13 MEMBER SONNABEND: Thank you,
14 Miles.

15 At the beginning of preparing this
16 document, we did ask the Department to weigh-
17 in on what our options were, short of
18 rulemaking. So, it is helpful that at least
19 now at the meeting many months later you are
20 telling us there are other options besides
21 guidance. And perhaps we can find out more
22 about like the difference between a policy

1 memo and an instruction, and all that, and
2 elaborate that on our next version of it.

3 We just felt it was important. I
4 guess I mean, by our resolution, guidance in
5 the general sense of the word, not in the USDA
6 sense of the word. And so, what form that
7 guidance takes is something we can explore
8 more, if it is a policy memo, instruction,
9 like that.

10 CHAIR RICHARDSON: Jay?

11 MEMBER FELDMAN: I am trying to
12 get a sense, Miles, from you as to how you
13 would use this information. Obviously, this
14 would come as a recommendation, whether it is
15 guidance or rulemaking. And at the end of the
16 day, there is an internal process that can
17 take pieces or all of whatever comes from the
18 NOSB. I just want to verify that.

19 MR. McEVOY: Yes, the Board can
20 provide us with a recommendation on excluded
21 methods, and that could come in a variety of
22 different forms. It could be a recommendation

1 for rulemaking. It could be a recommendation
2 for clarification through guidance or
3 instruction.

4 With any recommendation that we
5 receive, we then do our own analysis to see,
6 okay, do we have the authority to do this? If
7 we do have the authority to do this, do we
8 want to do it?

9 And then, if we do want to do it
10 what is the best way to implement that and
11 make it effective? Is it through rulemaking?
12 Is it through just clarification to
13 certifiers.

14 And so, what we will do in this
15 process is try to provide as much information
16 as we can, so that whatever recommendation
17 comes out at the end of this process, we can
18 most easily implement into our system.

19 MEMBER WALKER: Okay. I would
20 like to name and thank the Committee members.
21 Nick Maravell was a part of this Committee;
22 Dr. Jennifer Taylor; Zea Sonnabend.

1 And we thank Zea because many
2 times, as the Subcommittee Chair, my biggest
3 issue is just to help move things along
4 because sometimes we want to make sure because
5 we have had experiences sometimes the programs
6 have issues with some of the things that we
7 are doing. And my task many times is just
8 hoping that we could get it out to the public.
9 And Zea has done a very good job of getting
10 things out, and that the program can agree
11 with as well.

12 Also on the Committee is Dr.
13 Francis Thicke. He will be dealing with the
14 GMO strategies. I will be assisting him, and
15 hopefully, one of the new Board members.

16 Dr. Wendy Fulwider is also a
17 member of this Committee, along with yours
18 truly.

19 And we appreciate the help of Dr.
20 Brines, who is on the call once a month.
21 Emily is also on the call and Betsy Rakola.
22 And last, but not least, is Michelle Arsenault

1 who is also on the call.

2 And every now and then, we get a
3 cameo -- oh, I'm sorry, Jay. Jay is also on
4 the call.

5 So, quite often, we have greater
6 than 10 or 12 individuals on the call.

7 And, Harold, we appreciate your
8 sitting in from time to time and hope, coming
9 up, that you will be a part of the Committee
10 because the more Board members participating
11 and listening in, it is very helpful as we are
12 trying to hammer out to get out to the public.

13 Madam Chair, that's it.

14 CHAIR RICHARDSON: Thank you for
15 your Subcommittee report and for the
16 information provided in it.

17 So, this brings us pretty much to
18 the end of today's proceedings.

19 I think, Mac, you had something
20 you wanted to comment on?

21 MEMBER STONE: I just wanted to
22 remind everybody there is a reception tonight

1 at 21C Museum. If you go out the main door of
2 the hotel and walk uphill away from the river
3 to Main Street, it is about four or five
4 blocks to the right. And when you see a 20-
5 foot tall red penguin, you will know you are
6 at the right place.

7 (Laughter.)

8 I think it starts at 6:30, and I
9 hope all of you all can join us. There will
10 be a lot of great organic food and a good
11 chance for all of us to share and just be
12 friends for a few hours.

13 CHAIR RICHARDSON: And I am going
14 to wave my magic wand because we had a really
15 good day. So, let's just make sure we carry
16 forward the good vibes until morning, when we
17 will meet again at 8:30.

18 (Applause.)

19 (Whereupon, at 5:31 p.m., the
20 meeting was adjourned for the day, to
21 reconvene the following day, Wednesday,
22 October 29, 2014, at 8:30 a.m.)

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C E R T I F I C A T E

This is to certify that the foregoing transcript

In the matter of: National Organic Standards Board

Before: USDA

Date: 10-28-14

Place: Louisville, KY

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UNITED STATES DEPARTMENT OF AGRICULTURE

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NATIONAL ORGANIC STANDARDS BOARD MEETING

+ + + + +

WEDNESDAY, OCTOBER 29, 2014

+ + + + +

The National Organic Standards Board met in Grand Ballroom B, Galt House Hotel, 140 N. 4th Street, Louisville, Kentucky, at 8:33 a.m., Jean Richardson, Chairperson, presiding.

PRESENT

JEAN RICHARDSON, Chairperson
JOHN FOSTER, Vice Chairperson
MAC STONE, Secretary
HAROLD AUSTIN
CARMELA BECK
COLEHOUR BONDERA
JOE DICKSON
TRACY FAVRE
JAY FELDMAN
WENDY FULWIDER
NICK MARAVELL
ZEA SONNABEND
JENNIFER TAYLOR
FRANCIS THICKE
C. REUBEN WALKER

STAFF

MICHELLE ARSENAULT, Advisory Committee Specialist
LISA BRINES, NOP National List Manager
EMILY BROWN ROSEN, AMS NOP Specialist, Standards Division
MILES MCEVOY, AMS NOP Deputy Administrator
CARRIE RICCI, Office of General Counsel

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

8:33 a.m.

CHAIR RICHARDSON: Good morning, ladies and gentlemen. If you will kindly take your seats, we'll get started with this morning's public comment. This morning, before the first public comment, Harriet -

MS. BEHAR: Oh, okay. I just wanted to be heard.

CHAIR RICHARDSON: One second. We're just going to have a couple of -- I know, she's raring to go.

MS. BEHAR: Hey, you said 8:30.

CHAIR RICHARDSON: I know, and I'm --

(Laughter.)

CHAIR RICHARDSON: The meeting's out of control already. I asked Mac, since he's our local Kentucky person, if he would please say something or other this morning to us before we start the day. Mac?

MR. STONE: Thank you, Madam

1 Chair. I appreciate everyone coming to
2 Kentucky. We were looking forward to hosting
3 this meeting a year ago, and that didn't pan
4 out. There's been a lot of water over the dam
5 and under the bridge and around the dam and
6 everything in that past year.

7 And frankly, the way the San
8 Antonio meeting went, I changed - frankly, I
9 uninvited the Commissioner of Agriculture to
10 make an address, who manages the organic
11 program, because I was concerned of what
12 perception he might take away from this
13 conversation.

14 Frankly, I uninvited Mary Berry
15 and her dad Wendell for the same reason, in
16 that if -- I'm sure Wendell would see -- and
17 maybe we should have -- maybe I should have
18 let Wendell see that maybe we're not having
19 the right conversation. We're picking each
20 other apart a little bit rather than sort of
21 seeking some common ground and moving forward.

22 So, but Miles, I do appreciate the

1 fact that you're moving the meetings around
2 the country. We had some local people here
3 yesterday from Indiana at the reception. I
4 know there were some Kentucky folks here that
5 benefitted from all of us in the room being
6 here.

7 But something that's crossed my
8 mind, my wife and I, that have a certified
9 organic farm, very militant about organic at
10 our house, and just sort of something, John,
11 that you and I have talked about and a few
12 others on the board, of let's all fill out an
13 OSP for our home just like the farmers and the
14 processors do.

15 So, just a few things, and Jean, I
16 won't go through this whole thing because I
17 kind of got carried away thinking about how
18 detailed, and what the certifiers do, and
19 provide the service that certifiers provide
20 farmers and handlers.

21 But in your house, carpet, it
22 ain't happening. VOC rating, all the stuff

1 that's in carpeting, it's not organic, not
2 going to be in your house. That deck, no
3 treated lumber. You're going to -- but then
4 what kind of sealant are you going to use on
5 that deck if it's not treated? So you have to
6 develop a system around managing that.

7 At our house, we use beautiful red
8 oak, random width, random length wood, and
9 found a sealant that would -- had a low VOC
10 rating, and we put a little more slant on it
11 so the water would drain away a little
12 quicker. We put a little water gap between
13 the planks.

14 And those are the little examples
15 of what farmers and handlers do to meet the
16 intent of continual improvement. And I just
17 think we all need to look around at our own
18 homes, our own lives, if we're going to be so
19 critical of each other, and each other, of how
20 we seek continual improvement, Miles.

21 So, that's just -- then the buffer
22 zone with your neighbor. You got to

1 communicate with your neighbor. Their tree
2 hangs over the fence into your yard. You
3 know, how are you going to manage that?
4 They're going to spray insects on their side
5 of the fence.

6 Personal hygiene, I'm not going to
7 go too deep into that conversation, but
8 hopefully your certifier is available and you
9 can get some information, and you can read
10 lots and lots of labels of what you can or
11 cannot use. Livestock farmers do a lot of
12 that.

13 First aid, sort of the same
14 iteration, and the problem there being some of
15 those remedies may not be readily accessible.
16 You have to order them online. You have to
17 find them. You have to wait for them to get
18 there.

19 Pest control, you get a mouse that
20 comes into the house in the fall looking for
21 a warm spot. You don't have any vitamin D3
22 available. You've gotta find it. You've

1 gotta wait for it to get there. You've got to
2 find a little trap.

3 Ants, yes, there are some great
4 ant baits, but we know they can hurt bee
5 colonies when they carry that back to their
6 hive.

7 So, I'd love to share more of
8 this, but in essence of time, and we have lots
9 of public comment, just in the kitchen, I
10 pulled out the processing application, OSP for
11 handling. And just think about in your
12 kitchen all of the various levels.

13 So, just think about that. Pull
14 up a copy from your favorite certifier and
15 pretend you're filling it out for your home,
16 and recognize how diligent the farmers, and
17 the handlers, and the certifiers do to build
18 that logo and that label on behalf of all of
19 us, and let's just all work together to make
20 that, then seek this continual improvement.

21 And the work of this board is very
22 rewarding to me. And those of us with our

1 differences of opinion, but you'll see how
2 well we communicate and work together. And we
3 need your all's input to make this seal the
4 best it can be. Thank you.

5 (Applause.)

6 CHAIR RICHARDSON: Thank you very
7 much, Mac. That was good thinking like in a
8 system, systems thinking. So you are, in
9 fact, now up, Harriet. Thank you very much.
10 And on deck we have Linley Dixon.

11 MS. BEHAR: Okay, good morning.
12 I'm Harriet Behar, organic specialist with the
13 Midwest Organic and Sustainable Education
14 Service, MOSES. I would like to address the
15 proposed NOP pesticide drift guidance, and
16 request that this guidance be in draft form so
17 that the NOSB, organic farmers and public will
18 be able to provide input on this important
19 issue facing our community.

20 In my work for MOSES, I receive
21 numerous calls each year from organic farmers
22 who have suffered from unwanted incursions of

1 toxic agricultural chemicals onto their
2 organic land.

3 In all of these cases, there is no
4 question that the pesticide drift has
5 occurred, but there is a disagreement on what
6 type, if any, compensation should be given.

7 The farmer may have to destroy
8 their entire crop due to the fact that an
9 unregistered material was applied to that
10 crop, or may suffer the loss of the organic
11 premium due to the removal of the crop's
12 organic status.

13 In addition, there's the
14 possibility that the land itself will be
15 determined -- or to be decertified for one,
16 two, or three years from producing an organic
17 crop.

18 While organic farmers feel they
19 should be reimbursed for their losses, it is
20 not just about the loss of their income. They
21 want that financial penalty to be placed on
22 others to discourage this type of problem from

1 occurring to them and other organic farmers in
2 the future.

3 Beyond this, it's not just about
4 the money. In the Upper Midwest, organic farm
5 fields are an oasis of life in a sea of
6 sterilized and degraded land.

7 The buffer zones and riparian
8 areas surrounding organic fields have diverse
9 plants, shrubs, and trees providing habitat
10 and food sources for threatened amphibians,
11 birds, butterflies, pollinators and mammalian
12 wildlife.

13 Through organic practices, organic
14 farmers continually improve the critically
15 important soil food web, encouraging a healthy
16 and robust diversity of soil biological life.

17 The incursion of unwanted toxic
18 materials on organic land does more than just
19 hurt the bottom line of the organic farmer.
20 It sets back the progress the farmer is
21 continually making in developing a healthy
22 ecosystem upon which they rely to produce

1 abundant and healthy crops.

2 Organic farmers have told me that
3 they can see to the row where the drift event
4 had occurred numerous years before. The weed
5 species growing in those areas are different
6 and more problematic than they areas when they
7 had not had drift.

8 The soil texture is less friable
9 and has less water-holding capacity due to the
10 reduced soil biological life. And future
11 crops have less vigor and health, also
12 diminish more beyond that first year.

13 In 2013, the Supreme Court of
14 Minnesota, in a pesticide drift case, took
15 away the rights of an organic certification
16 agency to deny certification of a field and
17 crop that had pesticide drift.

18 In 2014, when the drift occurred
19 again, the certification agency did not
20 decertify that crop. The organic farmer is
21 currently appealing that decision to the NOP.

22 It is understood that organic

1 producers are a very small segment of the
2 agricultural production in the U.S. However,
3 farmers who have had this problem, not one of
4 them would welcome the opportunity to sell
5 that crop they know to be contaminated as
6 organic.

7 With the continued approval of new
8 GMO and herbicide-resistant crops, I believe
9 there will be more drift. Organic farmers
10 want the NOP to provide a strong platform from
11 which they can make a case to those who will
12 chemically trespass on the organic land that
13 economic compensation is the right of the
14 organic farmer.

15 It is only unfortunate that they
16 cannot also receive compensation for the pain
17 and suffering caused by seeing the land they
18 have nurtured so carefully to be despoiled.

19 I want to thank Jay, John and Joe
20 and Wendy for their service to the organic
21 community, and I hope that they enjoy all the
22 free time that they will now have.

1 CHAIR RICHARDSON: Great
2 presentation. Thank you, Harriet. Questions?
3 Harold?

4 MR. AUSTIN: Might as well start
5 the morning off right, Madam Chair? Good
6 morning. Thanks, Harriet.

7 MS. BEHAR: Good morning.

8 MR. AUSTIN: You talked about the
9 concerns for additional future drifts. The
10 source of, just for a little more
11 clarification I think for everybody, from
12 ground application, pivot application, aerial
13 application, where would that additional
14 concern come from?

15 MS. BEHAR: Well, part of it has
16 to do with the new 2,4-D, which tends to drift
17 a lot more. I know that they have this new
18 formulation that's supposed to not drift quite
19 as much. But I really feel that there's just
20 -- there's almost an attitude because organic
21 is so small.

22 And after the Minnesota Supreme

1 Court decision, which I have gotten phone
2 calls from farmers in Illinois whose insurance
3 agency, from the drift, the person who caused
4 the drift, tell them that they're not going to
5 give them compensation based on the Minnesota
6 Supreme Court decision.

7 So it's spreading around the
8 country that organic farmers have been told,
9 you're just the little guy. You just have to
10 learn how to deal with drift because we are
11 the dominant form of agriculture. And just,
12 there's going to be drift, and just deal with
13 it.

14 And that's really unfair to the
15 organic farmer, especially for the reasons
16 that I said, that they really are this oasis
17 of biological life that we can't just deal
18 with drift. It has to stop at the property
19 line so we can go on and do our good work.

20 CHAIR RICHARDSON: Miles?

21 MR. McEVOY: Yes, as I mentioned
22 yesterday, we're working on draft guidance for

1 pesticide drift. I think it's really needed
2 for consistency across the country in terms of
3 how certifiers deal with drift on organic
4 farms. It really varies from state to state
5 in terms of the impact and the recourse that
6 the organic farmer has when they get drifted
7 upon.

8 So, Harriet mentioned a Supreme
9 Court case in Minnesota recently. There's a
10 very interesting Supreme Court case in
11 Washington state from 1973, I think it's '73,
12 where the organic farmer prevailed in that the
13 drift was considered an application of
14 prohibited substances.

15 And it set the precedent of, if I
16 remember correctly, strict liability so that
17 compensation in Washington state is relatively
18 easy to get when you're drifted on whether
19 you're an organic farmer or a conventional
20 farmer when you get pesticide drift.

21 So it's very complicated. There
22 was actually a conference on pesticide drift

1 in Portland, Maine about 12 years ago that has
2 a lot of resources in terms of how drift is
3 looked at, management of drift, and what
4 happens when drift occurs in various states.

5 So I'm sure there's been a lot of
6 additional information since then, but we're
7 hoping to work on that. And if the board's
8 interested in that particular topic, we can
9 certainly collaborate with the board on
10 developing that draft guidance.

11 MS. BEHAR: I was giving my
12 impression from the Upper Midwest, and that's
13 why I thought it should, for sure, be a draft
14 guidance so everyone in the country would have
15 a chance to bring their experience and
16 knowledge to the table.

17 CHAIR RICHARDSON: Thank you for
18 raising that. The next speaker is Linley
19 Dixon followed by Amy Simpson.

20 MS. DIXON: Good morning. My name
21 is Linley Dixon. I'm a policy analyst for the
22 Cornucopia Institute, and I have a PhD in

1 plant pathology. My husband and I own a 100-
2 member CSA and farmer's market vegetable farm
3 in Durango, Colorado. I'm here to testify
4 about contamination of farm inputs from
5 firsthand experience.

6 My first year farming, I was able
7 to collect old hay from many farms and buy
8 several tons of six-year aged horse manure
9 from a rancher, black gold. I'd won the
10 lottery, or so I thought.

11 We spread the compost, months
12 passed, and the tomatoes in the greenhouse
13 didn't grow. There were distortions on the
14 leaves of many crops but not on others. The
15 extension agent diagnosed it as curly top
16 virus.

17 He said the virus arrived a few
18 years ago and he's been getting roughly 200
19 calls a year with these same symptoms on
20 solanaceous and leguminous crops in
21 particular.

22 I've traveled the world collecting

1 and diagnosing tomato diseases, publishing
2 papers and presenting at international tomato
3 disease conferences. This was not a virus.
4 I spent months conducting bioassays with the
5 compost. I found information from NCSU about
6 herbicide carryover in compost, and told the
7 extension agent that my bioassays indicated
8 this was the problem.

9 My compost was sent to Dow
10 AgroChemical for testing. The only places
11 that had the equipment to test for low
12 quantities of pyridinecarboxylic acids are the
13 companies that produce the herbicides.

14 The charge is \$200 per test.
15 There are 11 different pyridinecarboxylic acid
16 herbicides to test for. My extension agent
17 could only afford to test for one. This is
18 just one class of persistent herbicides that
19 could be the cause.

20 The test came back negative, and
21 Dow recommended that the grower should conduct
22 bioassays before they can grow again.

1 Meanwhile, I had to find new land
2 to grow my crops and give up on collecting
3 local free hay and manure. Every spring I
4 plant a tomato in the greenhouse to test the
5 soil for sensitivity.

6 To this day, four years later, the
7 plants still show symptoms even though the
8 greenhouse soil had been watered and tilled
9 every year, supposedly optimum conditions for
10 these herbicides to break down. And don't
11 forget, the compost was seven years old when
12 I incorporated it.

13 The label for aminopyralids reads
14 that hay or manure cannot leave the farm
15 within 18 months of being sprayed. What a
16 joke. The herbicides last at quantities that
17 kill sensitive plants for years, and no one is
18 even following the label.

19 Herbicide carryover is happening
20 all over the country. You hear about it when
21 it hits the big composting operations because
22 they have to explain the symptoms to hundreds

1 of customers, but you don't hear about it when
2 it hits individual farms.

3 What CSA or farmer's market
4 customer wants to buy organic produce from a
5 farm contaminated with herbicides? Herbicide
6 carryover is being misdiagnosed as a virus.
7 And if a farmer finds out they're
8 contaminated, they may protect their sales by
9 staying silent.

10 Persistent chemicals need to be
11 banned from production. It's nearly
12 impossible for organic farmers to be clean of
13 these materials once they're used. Farmers
14 should not be held responsible for
15 contamination or have to conduct bioassays for
16 months.

17 Liability should fall on the
18 manufacturer and user of the herbicides. It's
19 time for the large organic community, the
20 NOSB, and the NOP to educate the EPA about
21 what's happening. The only solution is for
22 the EPA to ban these persistent herbicides

1 nationwide rather than banning them state by
2 state while farmers suffer.

3 There's a ban on the use of
4 pyridinecarboxylic acids in New York. They
5 can't be sprayed on pasture in Connecticut,
6 Maine, Massachusetts, New Hampshire, Rhode
7 Island, and Vermont. The UK banned them in
8 2008 and released some under restricted uses
9 in 2011.

10 What about the rest of us who
11 continue to suffer from their persistence?
12 When it comes to compost contamination, we
13 need to choose our battles wisely, and go
14 after bans on the worst chemicals. We need to
15 ban persistent pyridinecarboxylic acid
16 herbicides.

17 They are known to directly kill
18 crops at minute quantities. We're talking
19 about less than one part per billion. We
20 can't be going out and testing composts.
21 These machines don't exist, and the plants are
22 more sensitive than the tests are. It takes

1 a long time for them to go away.

2 CHAIR RICHARDSON: Thank you very
3 much, Dr. Dixon. Questions? Excellent
4 presentation, much appreciated. Thank you.
5 The next presenter is Amy Simpson, and that
6 will be followed by Demetria Stephens.

7 MS. SIMPSON: Good morning. I'm
8 Amy Simpson, Policy Director and Staff
9 Attorney for Beyond Pesticides. As
10 frustrating and confusing as the statute can
11 be, it is within the words of the Organic
12 Foods Production Act that the very framework
13 of what it means to be organic must be rooted.

14 I thought it would be helpful to
15 use this four minutes to give a very
16 simplified tutorial and statutory
17 interpretation as there seems to be a lot of
18 confusion about what the words of OFPA
19 actually say, in particular with regard to the
20 Sunset Provision.

21 There are well-known rules or
22 canons of construction when you are trying to

1 figure out what on earth those crazy
2 legislators wrote in the statute. Statutory
3 construction is complicated. There are many
4 books. But the basics can be boiled down to
5 the following:

6 If the language of a statute is
7 plain and unambiguous, then it must be given
8 effect. If the terms of the statute have
9 received judicial construction before
10 enactment, the terms should be understood
11 according to that construction.

12 Every word and clause must be
13 given effect. Words are to be interpreted
14 according to the proper grammatical effect of
15 their arrangement within the statute. A
16 statute cannot go beyond its text. It all
17 starts with plain meaning of the words on the
18 page. And if those are clear, then you can't
19 contradict or reinterpret them away.

20 Generally, when courts or others
21 interpret the words of a statute, the
22 assumption is that the words mean what a

1 reasonable or ordinary person would understand
2 them to mean. So let's break down our example
3 provision as reasonable and ordinary people.

4 The first part, no exemption or
5 prohibition contained on the national list.
6 No materials on the national list. This is
7 easy, right? Next part, shall be valid
8 unless.

9 In the statutory world, shall
10 equals must, not optional or discretionary.
11 So whatever comes after the, unless, has to
12 happen or else the material is no longer
13 valid.

14 Next part, the National Organic
15 Standards Board has reviewed such exemption or
16 prohibition as provided in this section. So
17 if this doesn't happen, then the material is
18 invalid. What has to happen? NOSB has to
19 review.

20 But wait, it doesn't stop there.
21 It clearly states, review as provided in this
22 section. There's no comma or break. So what

1 does, as provided in this section, mean? OFPA
2 is made up of sections. The Sunset Provision
3 is a small subpart of Section 6517 titled,
4 National List.

5 Other parts of the National List
6 section include procedures for establishing
7 the National List. Those procedures include,
8 among others, the no addition standard,
9 rulemaking requirements for amendments to the
10 National List, and a mandate that the National
11 List be based upon the NOSB's proposed or
12 amended National List.

13 In other words, the procedures and
14 standards described for putting a material on
15 the list are the same as what the NOSB should
16 use to review a material under the Sunset
17 Provision. NOSB, remember, every word has a
18 meaning and has to be put in the context of
19 the whole statute.

20 When the provision references
21 NOSB, it is thus automatic that the section
22 that governs the NOSB, 6518, governs it in

1 this context as well. This includes, among
2 others, the decisive 2/3 majority vote and the
3 mandatory material review criteria.

4 Next section, within five years of
5 such exemption or prohibition being adopted or
6 reviewed. The review has to happen every five
7 years. Next, and, and means that you have to
8 complete both of the conditions to make a
9 material valid again.

10 So NOSB review as provided in the
11 National List section, and next part, the
12 secretary has renewed such exemption or
13 prohibition. The choice to make is to renew,
14 only option, no remove option.

15 So what does the secretary do if
16 he wants to take a material off the list?
17 Answer: nothing. By default, the material
18 isn't valid without a decision to renew.

19 It also follows that if the
20 procedures of establishing the National List
21 are what define the NOSB's review, the
22 consistent, decisive vote on which the

1 secretary can base his decision is one to
2 renew.

3 Putting it all together, no
4 material on the National List is valid unless
5 the NOSB reviews that material in the same way
6 it did when it decided to include it on the
7 National List within five years of the
8 material's inclusion or renewal at Sunset, and
9 the Secretary decides to include the material
10 on the list again.

11 These are the plain elements that
12 must be part of the Sunset Review standards.
13 Regulations can provide more detail and
14 insight into how to carry out a statute, but
15 cannot rewrite the plain meaning of the law.

16 CHAIR RICHARDSON: All right, I
17 wave my wand. Thank you. Are there questions
18 or comments? Colehour?

19 MR. BONDERA: Thank you, Amy. How
20 do I say this? Because I think what you
21 presented is very important to us, but what
22 should we do? I mean, that's where I'm left

1 with it.

2 MS. SIMPSON: No, and I understand
3 that the NOSB does not make regulations. But,
4 I think that there has been some confusion in
5 what these interpretations were, and I wanted
6 to present that this is the clear and plain
7 meaning that's in the provisions.

8 And the Sunset notice rule that
9 was put out in September of 2013 does not
10 follow these plain meanings. And I don't
11 think that there's been a unified voice from
12 the board asking the NOP to revoke that and
13 put out something that does follow this clear
14 mandate.

15 I understand there's things that
16 can be improved upon, but it needs to meet
17 these plain meaning standards. And as it is
18 right now, it does not. So I think that the
19 board really just needs to make their voice
20 heard and not just keep plowing forward on
21 this.

22 CHAIR RICHARDSON: Anything else?

1 MS. SIMPSON: Thank you.

2 CHAIR RICHARDSON: Other
3 questions? No, okay. Thank you very much,
4 Amy. We next have Demetria Stephens followed
5 by Carl Lenore.

6 MS. STEPHENS: Hello, my name is
7 Demetria Stephens. I'm a fifth-generation
8 farmer from northwest Kansas, and the
9 Secretary of the Organic Crop Improvement
10 Association. It's a farmer-owned, not for
11 profit certifier, and mostly made up of
12 producers, certifying more than 9,000 people.
13 That includes processors, handlers and the
14 like.

15 I'm one of those producers on a
16 farm that has been certified organic for 20 of
17 OCI's more than 30 years in operation. And
18 it's a mischaracterization to say that
19 operations like my own are intimidated to
20 comment at meetings such as this.

21 OCI's national organic program
22 certified members rely on the judgment of the

1 National Organic Standards Board to represent
2 their interests when they cannot comment
3 during NOSB meetings themselves. And open
4 dialogue has been one of the strengths of
5 organic between people who grow food and those
6 with an interest in where and how their food
7 is produced.

8 From OCI's perspective, consumer
9 interest in food transparency is a trend that
10 will continue to intensify and grow as
11 evidenced over the last 20 years of
12 legislative and regulatory activity, and
13 culminating in the efforts to label food with
14 genetically engineered ingredients, along with
15 the strong growth of the organic share in the
16 retail sector.

17 There are many areas where
18 strengthening and clarification of the NOP
19 rule are critical. And in general, we support
20 the NOSB's efforts to thoroughly analyze
21 changes to the NOP rule with independent
22 technical reviews when necessary.

1 Earlier this year, our
2 international board of directors submitted a
3 letter to the NOP and Agriculture Secretary
4 Tom Vilsack, regarding the certification of
5 hydroponic production.

6 This is an example of NOP in
7 action on NOSB's recommendations, and it
8 undermines the process established in the
9 Organic Food Production Act of 1990. Such a
10 process must continue after meetings like this
11 end, and it will as consumers and farmers keep
12 talking about what gives products integrity.

13 So from my own perspective as a
14 family farmer, we want the NOSB to feel
15 empowered to do what's necessary under the
16 OFPA. And we can answer questions that you
17 may have as a certifier, but also we have
18 members in our organization that are very
19 opinionated, and I'm sure if you called on
20 them, they would be willing to give
21 suggestions. So, thank you.

22 CHAIR RICHARDSON: Thank you.

1 Good comments. Questions, comments? Francis?

2 MR. THICKE: Thank you, Amy. Can
3 you tell us a little more about your thinking
4 about hydroponics? It wasn't real clear.

5 MS. STEPHENS: So OCI's board's
6 perspective has been that the organic -- the
7 foundation of organics has been based on a
8 soil production system. And I can give you a
9 copy of the letter that we sent to Tom Vilsack
10 and the NOP, but that's the gist of it.

11 CHAIR RICHARDSON: My microphone's
12 not working. Any other questions? Thank you
13 very much.

14 MS. STEPHENS: Thank you.

15 CHAIR RICHARDSON: Next speaker --
16 my microphone -- Demetria Stephens -- oh,
17 sorry, I mean, Carl Lenore followed by Allison
18 Murphy. No? Okay, the next person on the
19 list here is Joan Levine. Are you here?

20 Are these people deserting us
21 already? The party hasn't started. Oh, we've
22 got Joan, right? Is that Joan? No, oh, who

1 do I have? All right, now I have two people.

2 Help me understand who's --

3 MS. MURPHY: Allison Murphy.

4 CHAIR RICHARDSON: You're Allison,

5 all right. So, we'll have -- Allison will

6 present then. No? How are you going to do

7 it? No, you're going to go first? And so,

8 you are?

9 MS. LEVIN: My name is Joan

10 Levine.

11 CHAIR RICHARDSON: Joan, hi, thank

12 you.

13 MS. LEVIN: Hi, my name is Joan

14 Levine, and I'm a consumer and a retired

15 public health attorney, and a proud Cornucopia

16 Institute member from Chicago, Illinois. And

17 I'd like to stress that I'm here today as a

18 volunteer citizen lobbyist.

19 I've been involved with organic

20 foods ever since J.I. Rodale first popularized

21 the term in the United States right after

22 World War II, and long before USDA involvement

1 in setting standards.

2 And while I'm delighted to see
3 major food corporations' growing interest in
4 producing foods bearing the organic label, I'm
5 concerned lest organic standards be
6 compromised to accommodate this burgeoning
7 interest, and that's why I'm here today.

8 I believe the Sunset rules are
9 sensible ones that allow for reevaluation as
10 our knowledge grows, and I hope you will agree
11 that we must place public health and safety
12 first in making these determinations.

13 I will comment on five of the
14 handling subcommittee 2016 Sunset reviews
15 before you, the boiler chemicals,
16 octadecylamine, diaminoethanol, and
17 cyclohexylamine, as well as two processed food
18 ingredients, sodium acid pyrophosphate and
19 tetrasodium pyrophosphate.

20 The boiler chemicals fail all
21 three of the Organic Food Production Act
22 criteria. They are clear candidates for

1 Sunsetting. Not a single entity wrote in
2 support of relisting these materials.

3 We believe a safer alternative,
4 ammonium hydroxide, which was petitioned in
5 2012, may well be a better choice. However,
6 a new technical review must be conducted.

7 The 2001 Technical Advisory Panel
8 review is woefully out of date, and doesn't
9 even mention ammonium hydroxide as a
10 potentially safer alternative. We recommend
11 delisting these three toxic amines and
12 replacing them with ammonium hydroxide as a
13 boiler additive.

14 This might be the best alternative
15 to maintain boiler health, while minimizing
16 the impact to human and environmental health.
17 Sodium acid pyrophosphate or SAPP, is a
18 leavening agent used in a variety of baked
19 goods, approved in 2006 for the National List.

20 This material can hardly be
21 considered essential despite what some
22 industrial bakers may say, because natural

1 leavening, commercial yeast and sodium
2 bicarbonate will do the job.

3 Only one food processor wrote in
4 support of this material, which also brings in
5 to question its essentiality. Also, the
6 manufacturing of SAPP produces phosphoric acid
7 waste. So it may fail the effects on
8 environment criteria in the OFPA.

9 Since the handling subcommittee
10 did not complete a checklist on this material,
11 we are not operating with full information.
12 Therefore, The Cornucopia Institute cannot
13 support the relisting of this material at this
14 time.

15 Tetrasodium pyrophosphate, TSPP,
16 is a dough conditioner for imitation meat
17 products added to the National List in 2006.
18 In the first technical review conducted in
19 2002, two of the three expert reviewers
20 recommended that TSPP not be added to the
21 list, yet bewilderingly it was approved by the
22 full board.

1 The latest limited scope technical
2 review demonstrates that there are many
3 alternatives to this substance such as fish,
4 soy, pea, milk, and fungal-based ingredients.
5 Indeed, Cornucopia staff did not find a single
6 organic meat analogue product with TSP on the
7 ingredient lists when we did an internet scan
8 of commercially available products.

9 Not a single food processor wrote
10 in support of this material being relisted.
11 Therefore, it appears to fail the essentiality
12 criteria and should be removed from the
13 National List.

14 Thank you for allowing me to
15 present this testimony. If you have
16 questions, I encourage you to speak with one
17 of Cornucopia's scientific policy staff
18 advisors present at the meeting. And I thank
19 you so much.

20 CHAIR RICHARDSON: Thank you very
21 much. Our next speaker is Allison Murphy.

22 MS. MURPHY: Hi, as you said, my

1 name is Allison Murphy, and I'm the
2 Legislative Director at the Alliance for
3 Natural Health USA. ANH is a nonprofit,
4 membership-based organization consisting of
5 healthcare practitioners, food and supplement
6 companies, and over 350,000 consumers.

7 Our members are passionate about
8 access to high quality organic products, and
9 we support the NOSB action that promotes an
10 honest, responsible, and transparent organic
11 production system.

12 ANH strongly opposes any efforts
13 to dilute organic standards, and we hope the
14 NOSB will continue to listen to the voices of
15 consumers and producers who want to protect
16 access to true organic products.

17 ANH commends the board's efforts
18 to strengthen excluded methods terminology.
19 As a consumer advocate, we repeatedly hear
20 from our members about consumers' desire to
21 avoid genetically modified food products.

22 Eliminating confusion in the

1 definition will improve consistency in the
2 quality of organic production, and increase
3 consumer confidence that certified organic
4 foods do not contain genetically engineered
5 components.

6 ANH strongly supports a
7 prohibition on BPA in packaging material used
8 for organic foods, and we agree with the
9 handling subcommittee's assessment that
10 further research on suitable alternatives is
11 necessary.

12 However, we hope this research is
13 not limited to suitable alternatives for the
14 lining of cans, but instead encompasses
15 broader potential improvements for food
16 packaging in general.

17 ANH also supports the removal of
18 non-organic ingredients from organic food
19 production. However, as others have stated as
20 well, we are very concerned about the changes
21 made to Sunset consideration.

22 Keeping a non-organic ingredient

1 on the National List should mandate strict
2 scrutiny, high barriers and careful
3 consideration. The changes to Sunset
4 consideration fly in the face of OFPA and
5 diminish the board's authority.

6 We hope the board will stand up
7 for its authority when possible, and share
8 concerns expressed at this meeting with the
9 NOP, the USDA and others.

10 Laws allowing synthetic
11 ingredients in organic food production should
12 be construed in the narrowest sense, and
13 exceptions should not be made merely to make
14 organic certification easier to obtain.

15 The organic industry should be
16 called to rise to the standards of that label.
17 Standards should not be brought down to meet
18 industry.

19 Finally, it's important to organic
20 consumers that GMO exposure is limited,
21 including GM vaccines. We ask the NOSB to
22 work to gather the necessary information and

1 formulate standards for excluded vaccines.

2 GM vaccines should not be part of
3 approved organic production, and it's
4 imperative that the NOSB act on this issue in
5 a timely manner to protect consumers.

6 Organic certification is often the
7 main indicator that consumers use to
8 distinguish between healthy, sustainable foods
9 and foods containing synthetics or are
10 produced using genetic engineering.

11 It's for this reason that we
12 continue to strongly encourage the NOSB to
13 perpetuate the highest standards for certified
14 organics, and to answer consumer demand for
15 truly organic products in an honest,
16 transparent and responsible way.

17 Thank you for your time and the
18 opportunity to participate at this meeting.

19 CHAIR RICHARDSON: Thank you very
20 much. Questions, comments from the board?
21 Thank you. And I'm not doing my job very well
22 here. I'm not doing two people in a row. Let

1 me try again. The next person to speak is
2 Robin Migalla followed by Paige Tomaselli.

3 MS. MIGALLA: Hello, my name is
4 Robin Migalla, and I'm a consumer from Elgin,
5 Illinois. I'm a member of the Cornucopia
6 Institute, and I'm here today as a citizen
7 lobbyist. I have volunteered to help present
8 testimony because I want to ensure the
9 integrity of organic food.

10 I grew up under the tyranny of
11 chronic illness, but discovered that organic
12 nutrient-dense food is the cornerstone of
13 health. I feel so fortunate that today local,
14 sustainably produced, nutrient-dense foods can
15 be found in nearly every grocery store, and I
16 can go directly to the farm for what isn't yet
17 available on the grocer's shelves.

18 This is a wonderful trend, and I
19 possess robust health today as a result. It
20 is so vitally important to me that these foods
21 remain as safe and wholesome as I have come to
22 expect. I rely on the USDA organic label as

1 a reassurance of that safety.

2 I'm here today to add my voice to
3 others who want to preserve that reassurance.
4 I will comment on the four handling
5 subcommittee 2015 Sunset reviews before you,
6 gellan and tragacanth gums, as well as Marsala
7 and sherry cooking wines.

8 The Cornucopia Institute agrees
9 with the handling subcommittee motions to
10 delist Marsala and sherry from the National
11 List of non-organic substances.

12 Similar ingredients are available
13 in organic form, and there is little, if any,
14 demand for these ingredients by organic
15 processors.

16 Based on Cornucopia's interview
17 with the original petitioner, they are no
18 longer using these ingredients in their
19 products. Not a single entity wrote in
20 support of relisting these cooking wines.

21 However, we disagree with the
22 subcommittee's motion to retain gellan gum and

1 tragacanth gum on the National List for the
2 following reasons.

3 The gellan gum technical review is
4 nearly ten years old and is not thorough.
5 Tragacanth gum never had a technical review to
6 adequately evaluate this substance before it
7 was approved, and it still does not have one.

8 Gellan gum is a highly processed
9 synthetic material with isopropyl alcohol
10 residues up to three-quarters of a percent.
11 Isopropyl alcohol is a processing aid
12 prohibited in organics.

13 When the original petitioner asked
14 for this substance to be listed, they
15 described it as a non-organic, synthetic
16 substance, yet the word synthetic has been
17 removed from the listing. It is a synthetic
18 substance and should be reviewed as one.

19 Tragacanth gum fails the
20 essentiality criteria of the OFPA because very
21 few organic processors are using this material
22 due to limited supply. Instead, most

1 processors are using more plentiful gum arabic
2 which is available in organic form.

3 The Cornucopia Institute requests
4 that a new technical review be performed for
5 every material that is up for Sunset review.
6 Further, we request that the subcommittee
7 discussions on proposals be based on
8 information in the new TRs.

9 It is our opinion these substances
10 cannot be properly evaluated without this
11 critical information. It is negligent to
12 continue to allow a non-organic substance to
13 be used for our food without the best and
14 latest information as possible.

15 We understand these things take
16 time, but we have five years between each
17 Sunset review. That is enough time to get
18 updated technical reviews of every substance.

19 In conclusion, please delist
20 Marsala and sherry cooking wines because they
21 are not essential with similar organic
22 alternatives existing to replace them.

1 Please delist or table for further
2 consideration gellan gum because it is a
3 synthetic and has a very poor, out-of-date
4 technical review. And delist tragacanth gum
5 because it is nonessential and lacks any
6 technical review whatsoever.

7 Thank you for allowing me to
8 present testimony. If you have questions,
9 please speak with one of Cornucopia's
10 scientific policy staff members present at the
11 meeting.

12 CHAIR RICHARDSON: Thank you very
13 much for your comments.

14 MS. MIGALLA: Thank you.

15 CHAIR RICHARDSON: The next
16 speaker is Paige Tomaselli to be followed by
17 Kelly Shea.

18 MS. TOMASELLI: All right, good
19 morning. My name is Paige Tomaselli, and I'm
20 a Senior Attorney at The Center for Food
21 Safety.

22 Methionine was a hot topic at the

1 April meeting in San Antonio. One of the main
2 concerns raised by producers was that without
3 adequate methionine, chickens would turn to
4 cannibalism.

5 We had never heard this argument
6 about methionine, and knowing that animal
7 welfare regulations are on the NOP's agenda,
8 Center for Food Safety undertook to
9 investigate the link between methionine and
10 animal welfare.

11 In sum, we uncovered three main
12 findings. First, crowded and unhealthy
13 poultry living conditions and limited access
14 to the outdoors to scratch, peck and engage in
15 other natural behaviors is, in fact, what
16 leads to aggressive behavior.

17 A telling example is the manner in
18 which birds access their feed. When poultry
19 are allowed to express natural foraging
20 behavior such as pecking and scratching at the
21 ground to obtain grubs, earthworms, and
22 greens, cannibalism and feather pecking

1 decreases.

2 On the other hand, when poultry
3 are given feed that can be consumed rapidly
4 and satiate birds quickly, it can actually
5 stimulate feather pecking because the birds
6 are not sufficiently exercising their pecking
7 behavior.

8 Second, the differences in poultry
9 performance are not as pronounced as industry
10 claims. Researchers at the UK Organic
11 Research Center compared four different
12 poultry diets, only one of which included
13 synthetic methionine.

14 They have found that birds fed the
15 100 percent organic diet did not have
16 significant differences in weight or mortality
17 compared to those fed synthetic diets or diets
18 with synthetic inputs.

19 In fact, laying hens fed 100
20 percent organic diets had higher egg output
21 compared to those fed a synthetic diet.

22 Third, we looked at the viable

1 alternatives that support chickens' natural
2 omnivorous diet. The most promising area of
3 research to alternative sources of essential
4 amino acids for poultry rearing focuses on
5 insect species as a suitable protein source.

6 High methionine insects such as
7 fly maggots from black soldier flies and house
8 flies, for example, can be reared on organic
9 poultry manure and organic feed stocks, such
10 as waste materials from organic food
11 processing plants, that can be fed 100 percent
12 organic diet and then used for organic
13 poultry.

14 Many board members were also
15 concerned about methionine's seemingly endless
16 ride on the National List. In fact,
17 methionine has become the poster child for a
18 failed Sunset process, and the new Sunset
19 policy is not going to make it any easier to
20 come up with a solution to replace methionine
21 with a natural source. In fact, it may have
22 the opposite effect of inhibiting the

1 development of non-synthetic alternatives.

2 In contrast to the plain language
3 of OFPA, the new NOP policy presumes that
4 substances will remain on the list, further
5 hindering the ability of NOSB to remove
6 methionine and any other substances from the
7 list, and negating OFPA's continuous
8 improvement mandate.

9 Now onto excluded methods and GMO
10 vaccines. CFS supports the efforts to further
11 clarify and interpret the NOP definition of
12 excluded methods.

13 CFS believes that the current
14 definition of excluded methods is strong, and
15 should be used as it was intended as a
16 benchmark against which new and emerging
17 technologies are weighed.

18 We agree that the clarification
19 should come through guidance developed by NOSB
20 with help from the organic community in order
21 to establish a clear understanding of those
22 techniques that are acceptable in organic

1 production and those that are not.

2 The organic community must agree
3 upon what exactly it is about a method or
4 technique that is objectionable in the organic
5 context.

6 We appreciate the head's up on
7 this --- that this issue will be on the agenda
8 for spring of 2015, and CFS will endeavor to
9 provide as much additional information as
10 possible before that time.

11 It is absolutely imperative that
12 NOSB create a system of classifying vaccines
13 so that animal producers are able to identify
14 which vaccines are GMO and which vaccines are
15 not.

16 Our guidance on excluded --- once
17 our guidance on excluded methods is refined,
18 the list of GMO vaccines can be refined as
19 well.

20 CHAIR RICHARDSON: Thank you.

21 MS. TOMASELLI: Thank you.

22 CHAIR RICHARDSON: Questions?

1 Francis?

2 MR. THICKE: Thank you, Paige.
3 I'm curious about your case study and the
4 interesting finding, apparently, that I'd like
5 to see it, that it's more behavior that causes
6 the rapid eating and pecking.

7 And in your case study, did the
8 organic diet have what's considered adequate
9 methionine, or what --- as much as a synthetic
10 methionine diet? Do you remember, or can you
11 get us a copy of that study?

12 MS. TOMASELLI: I can definitely
13 get you a copy of the study. I have the
14 citation here. Well, not to waste time, I'll
15 provide the citation right after this.

16 But as far as I understand, the
17 levels were similar to the synthetic
18 methionine levels, the levels of methionine in
19 the 100 percent organic diet. But the birds
20 do grow, you know, slower.

21 It's basically, it's about
22 performance standards and now welfare, so it

1 does take longer for the animals to produce
2 meat and/or eggs, but not significantly
3 longer.

4 So it doesn't really hinder the
5 health of the birds, but they might grow
6 slower.

7 CHAIR RICHARDSON: Jay?

8 MR. FELDMAN: Thank you, Paige. I
9 had a question on methionine as well regarding
10 the motion at the last board meeting on the
11 five-year expiration date or, you know, a
12 provision within the annotation, or within the
13 listing of methionine, methionine's annotation
14 that would require the board to review the
15 material on a vote to relist after a five-year
16 period.

17 Some of the issues you're citing
18 are somewhat experimental. I heard at the
19 last meeting that the, you know, the feeding
20 of insects and so forth may not be approved,
21 the maggots by FDA. I don't know if we
22 verified that or not. Then you mentioned

1 continuous improvements.

2 So I'm wondering from a legal
3 perspective the value of this board
4 identifying materials like methionine that
5 are, you know, raise certain questions about
6 essentiality, adverse impacts in the diet,
7 what have you, whether this board should be
8 considering expiration dates, and what impact
9 that has on the actual process of review.

10 MS. TOMASELLI: Okay.

11 MR. FELDMAN: And juxtapose that
12 with the Sunset process and, you know, how
13 that would work ---

14 MS. TOMASELLI: Right.

15 MR. FELDMAN: -- just so people
16 understand.

17 MS. TOMASELLI: Well, I just - I
18 think to start I would say that a firm
19 expiration date is basically necessary to
20 light a fire under industry to find a suitable
21 alternative.

22 And so, if there is a firm

1 expiration date in the provision, or sorry,
2 you know, by the board, then you would have,
3 you know, an end date for by which you'd have
4 to find a suitable alternative.

5 As far as the alternatives that we
6 are promoting, we did do some research into
7 whether or not insects, for instance, are FDA
8 approved. And in fact, soldier fly maggots
9 can be used according to FDA, and they do not
10 have to go through any type of rigorous
11 approval.

12 Some producers are going through
13 the grass process because they want to cover
14 all of their bases, but FDA basically said
15 that they would just need to go through the
16 AAFCO certification process to cover, you
17 know, to cover their bases entirely.

18 So, but we believe that, you know,
19 innovation is spurred by, you know, by a
20 significant end date in the process, and that
21 the Sunset --- the Sunset process is meant, it
22 was created to do that, to give an end, you

1 know, an end to a limited time frame by which
2 a substance can be utilized in the short term.

3 So, we believe that that's
4 critical to getting methionine off the list
5 and for other substances as well.

6 CHAIR RICHARDSON: Any other
7 questions?

8 DR. WALKER: One quick question.
9 My question to you is, is synthetic
10 methionine, to you, an animal welfare issue,
11 yes or no, or ---

12 MS. TOMASELLI: Just a yes or no
13 question?

14 DR. WALKER: You can explain. You
15 can also explain if you wish.

16 MS. TOMASELLI: Yes, yes, no.
17 From our research we found that synthetic
18 methionine is --- it's about performance and
19 it's not about welfare. I think I alluded to
20 this before.

21 You know, we believe that animal
22 welfare is about the conditions in which

1 animals are raised, and that crowded,
2 unhealthy living conditions, they create the
3 situation which causes cannibalism. Boredom
4 creates a situation which causes cannibalism.

5 But in fact, synthetic methionine,
6 the levels that the producers are looking at
7 attain, that's just for peak performance.
8 That's so that they can get their broilers out
9 the door in six weeks, or they can make the
10 number of eggs that they're looking hits their
11 target.

12 And so, from our perspective, it's
13 not an animal welfare issue but a performance
14 issue.

15 CHAIR RICHARDSON: Thank you very
16 much.

17 MS. TOMASELLI: Thank you.

18 CHAIR RICHARDSON: The next
19 speaker is Kelly Shea following by Alison
20 Leathers.

21 MS. SHEA: Good morning. I want
22 to thank Jay, John Foster, Wendy, Joe Dickson

1 for your service on the board. I was sitting
2 there thinking between the four of you, you've
3 given 20 years of service to the organic
4 community, so thank you for that. No, it's a
5 lot when you amalgamate it.

6 And then I want to welcome Lisa de
7 Lima, Tom Chapman, Ashley Swaffer and Paula
8 Daniels to the board, and let them know that
9 they have very, very big shoes to fill.

10 I want to say thank you to the
11 USDA cross functional team for traveling here
12 to Louisville to participate with the organic
13 businesses here. And a special thanks to the
14 NOP for their tireless work.

15 Unlike many Washington
16 bureaucrats, they do not go home at 4:30. And
17 to the NOP for dedicating almost half a
18 million dollars towards future tap reviews,
19 thank you for that.

20 I had the incredible opportunity
21 recently to break bread with the board of
22 IOIA, the International Organic Inspectors

1 Association. What a dedicated crew of people.

2 We would all --- all of us that
3 are certified entities and retailers of
4 organic products, benefit from well-trained
5 inspectors trained by IOIA.

6 Not all inspectors have the same
7 level of competency. And in part, that is due
8 to lack of consistent training. Inspectors
9 are a crucial linchpin in organic integrity.

10 We need more consistency, more
11 training, and I would dare say more
12 recognition, whether it's in financial
13 compensation to inspectors, but more
14 recognition of the value of good, solid
15 inspections to the integrity of the organic
16 seal.

17 And lastly, I want to echo the
18 very well done comments by Beth Unger of CROPP
19 Cooperative Organic Valley regarding gellan
20 gum. These materials for processing at a
21 value market for farmer's raw goods.

22 You know, everyone loves a farmer,

1 and what the farming community brings to our
2 nation's landscape. But without non-GMO, non-
3 synthetic materials such as gellan gum that
4 are produced and disposed of in a manner that
5 does not cause animal, environmental, or human
6 health harm, the markets for organic farmers'
7 products will be curtailed. Thank you very
8 much.

9 CHAIR RICHARDSON: Thank you,
10 Kelly. Questions? Do we have Alison
11 Leathers? Yes, and then the next speaker will
12 be Jessica Walden.

13 MS. LEATHERS: Hello, my name is
14 Alison Leathers, and I'm a graduate research
15 assistant from Nashville, Tennessee. I'm a
16 member of the Cornucopia Institute, and I'm
17 here today as a citizen lobbyist. I have
18 volunteered to help present testimony because
19 I want to ensure the integrity of organic food
20 and organic agriculture.

21 I developed my passion for growing
22 plants and conserving our land on my family's

1 sheep farm in the bluff country of
2 southeastern Minnesota. I'm a proud graduate
3 of the University of Minnesota's horticulture
4 program, and I'm currently pursuing my
5 master's degree in agricultural education at
6 Tennessee State University. My career goal is
7 to serve my community as an extension agent
8 and a third generation farmer.

9 I would like to comment on the
10 soil conservation discussion document put
11 forth by the compliance, accreditation, and
12 certification subcommittee. This is an
13 important subject because as we can all agree,
14 healthy soil is the foundation of organic
15 agriculture.

16 There are two main ways that
17 organic certifiers work to ensure that organic
18 producers are protecting their soil resources.
19 The first is the written organic system plan
20 that includes sections describing how the
21 producer intends to protect or enhance soil
22 and water quality.

1 The second is the annual
2 inspection in which certification staff visits
3 the operation to verify that the farm is
4 properly implementing the activities described
5 in their OSP.

6 There are clearly flaws with the
7 current system. First, some OSPs say very
8 little about what kind of soil and water
9 conservation practices are going to be
10 implemented.

11 One farm might say that they are
12 going to cover crop, use compost, use low till
13 practices, and plant on contours. Another
14 neighboring farm with similar soils may just
15 say they're going to use regular applications
16 of fish emulsion.

17 Who is doing enough? What will
18 the certifier say about this? The other flaw
19 is the annual inspection is only a brief
20 snapshot in time.

21 If the inspection happens in
22 summer, they may not see severe soil erosion

1 that happens later in the fall with the rains.
2 A dairy inspection in the summer may not
3 observe the farmer is applying excessive
4 quantities of raw manure on top of frozen
5 ground in the winter. How would an inspector
6 know what happens the rest of the year when
7 they only see the farm on one day?

8 In general, the organic system
9 plans need to be detailed about the full suite
10 of natural resources conservation practices
11 that are utilized year-round on a farm or
12 ranch.

13 Livestock producers should
14 describe their year-round grazing plan. Crop
15 producers should describe their year-round
16 cropping plan. All confined animal feeding
17 operations and dairy should describe their
18 year-round manure management plans.

19 Certification staff need much more
20 training to understand ecological land
21 management, soil quality indicators, and
22 reading the landscape for their on site

1 inspection. They must be able to read into
2 the OSP, and understand what is going on, and
3 what might be missing from the plan.

4 Over the years, inspections should
5 take place during different seasons so
6 certification staff can see the operation in
7 different seasons.

8 Any producer who has received a
9 notice of violation of a state or federal
10 environmental law should immediately be
11 required to submit an updated OSP addendum on
12 how they will rectify the situation, including
13 a timeline.

14 Certifiers should be required to
15 followup with corrective action. Likewise,
16 any certifier that has multiple producers with
17 violations should have their own accreditation
18 reevaluated.

19 Some of these concepts will not
20 require additional paperwork on the part of
21 the farmer because existing conservation and
22 manure management plans can be included as

1 addendums to the OSP.

2 These are just a few ideas we hope
3 you will consider seriously in order to
4 improve the natural resource conditions on
5 organic farms. Thank you for allowing me to
6 present testimony. If you have questions, I
7 encourage you to speak with one of
8 Cornucopia's scientific or policy staff
9 members present at the meeting.

10 CHAIR RICHARDSON: Great, thank
11 you very much. The next speaker is --- let's
12 see, where are we --- Jessica Walden, and that
13 will be followed by Troy Aykan.

14 MS. WALDEN: Hello, my name is
15 Jessica Walden, and I am a Senior Technical
16 Reviewer with QAI. I appreciate and commend
17 you all for the great work that you do.

18 I know that Madam Chair wanted a
19 bit more humor at this meeting. I appreciate
20 the way that you opened the meeting yesterday.
21 And while I'm going to talk about glycerin,
22 which, in itself, is not an inherently funny

1 topic.

2 I wanted to send a shout-out to
3 Jim Pierce for working the word constipation
4 into his comments. It was weird, but it made
5 me laugh too. Thank you, Jim.

6 So glycerin --- and also to get
7 your attention as well. The NOSB wanted to
8 know how the removal of synthetic forms of
9 glycerin would impact the production and use
10 of natural flavors that are allowed in organic
11 products.

12 Currently, synthetic glycerin is allowed
13 in natural flavors only because it is on the
14 National List as an allowed synthetic.
15 Glycerin is used in natural flavors but also
16 in organic bars, organic dietary supplements,
17 baked goods, personal care products, and other
18 products.

19 QAI has 33 clients using glycerin
20 as an ingredient. We have 265 clients using
21 natural flavors, and 85 clients using organic
22 flavors.

1 QAI reached out to individual
2 clients to get a sense of the forms that
3 either they were using directly, or the forms
4 of glycerin that their flavor suppliers were
5 using.

6 In all cases, while our clients
7 had information on the compliance of glycerin
8 to the current annotation, which is the
9 production via hydrolysis of fats and oils,
10 they did not know what type of hydrolysis was
11 employed in the manufacturing process, e.g.,
12 alkali hydrolysis, which is the synthetic form
13 or enzymatic or steam splitting, which is the
14 agricultural forms.

15 And they expressed concern that
16 they would have difficulty acquiring this
17 information or that there wouldn't be enough
18 agricultural forms of glycerin available.

19 QAI also spoke with FEMA, the
20 Flavor and Extract Manufacturer's Association
21 in the U.S., regarding the impact to the
22 natural flavor manufacturer's supplying to the

1 organic handlers.

2 And they indicated that they had
3 conducted a survey with their members on this
4 issue as well, and found that their flavor
5 manufacturers did not have solid data on how
6 the glycerin they were using was produced
7 because this information has never needed to
8 be provided in the past.

9 They were concerned that removing
10 glycerin from 605 now would result in a
11 critical market shortage of available
12 agricultural glycerin, and they asked if the
13 industry could have more time to collect this
14 data and work on reformulation if necessary.

15 QAI does appreciate the comments
16 made by Gwendolyn Wyard from OTA yesterday and
17 the figures that were provided on the
18 availability of agricultural forms of
19 glycerin, which it does appear to be enough to
20 meet the needs of the industry.

21 If the NOSB does decide to vote on
22 the removal of glycerin from 605 and add it to

1 606, QAI also supports the OTA's technical
2 clarification to the proposed annotation that
3 agricultural forms of glycerin include those
4 forms produced by biological and mechanical
5 physical methods.

6 And we also ask that consideration
7 be given to implementation time to allow the
8 switch over for the users of glycerin. Thank
9 you.

10 CHAIR RICHARDSON: Thank you.

11 Questions? Well, there you go.

12 MS. WALDEN: Okay.

13 CHAIR RICHARDSON: It's all clear
14 now.

15 MS. WALDEN: All right, great.

16 CHAIR RICHARDSON: Thank you. The
17 next speaker is Troy Aykan followed by Bill
18 Wolf.

19 MR. AYKAN: Good morning. My name
20 is Troy Aykan. I'm a food scientist and an
21 attorney with the Hain Celestial Group. I
22 also teach courses in food laws and

1 regulations at Cal Poly and Chapman
2 Universities, and Chapman University School of
3 Law.

4 Today, I will be commenting on
5 glycerin. We generally support the detailed
6 comments submitted by Gwendolyn of the Organic
7 Trade Association. There is a significant
8 concern that the organic glycerin is not
9 available in sufficient quantity for the needs
10 of organic food manufacturers.

11 We therefore support the motion to
12 move glycerin from 605(b) to 606. This would
13 allow the use of non-organic glycerin if
14 organic glycerin is not commercially available
15 in sufficient quantity.

16 We also support OTA's suggested
17 revision to the classification motion to read,
18 motion to classify glycerin as agricultural
19 when derived from agricultural source material
20 and processed using biological, or mechanical,
21 or physical methods described under section
22 205, 270 subsection A.

1 It is important to include the
2 various nonsynthetic agricultural forms of
3 glycerin that are used in foods and flavors.

4 Finally, it's unclear if listing
5 glycerin on 606 would impact the glycerin that
6 is used in natural flavors. We trust that the
7 board will keep this in mind when addressing
8 the listing of natural flavors on 605 during
9 Sunset review when considering any petitions
10 related to natural flavors.

11 Going forward, we believe that
12 non-organic glycerin must continue to be
13 allowed in non-organic flavors that are used
14 in certified organic products. Thank you.
15 Any questions?

16 CHAIR RICHARDSON: Thank you.
17 Question, Francis?

18 MR. THICKE: Thank you, Troy. Do
19 you know if Hain Celestial does use any
20 organic glycerin now, or has looked to source
21 organic glycerin?

22 MR. AYKAN: Yes, we have so many

1 different applications so I cannot say that,
2 you know, we all have switched, but we are in
3 constant contact with our suppliers that sells
4 us either organic flavor or natural flavor.

5 If we are looking at the natural
6 flavor part, right now, they might have ---
7 you said organic glycerin, right? Yes, right
8 now, it's not likely that --- most flavors do
9 not contain organic glycerin.

10 And then there is also --- you
11 also have the organic glycerin --- I mean, I'm
12 sorry, organic natural flavor that might
13 contain non-organic glycerin because it's
14 listed in 606 currently. So right now there's
15 no incentive or need for the flavor houses to
16 use organic glycerin in organic flavors.

17 But as the changes are made, you
18 know, this might change obviously. But we
19 have been in contact with the producers. And
20 in fact, if you guys went over some of the
21 comments, one particularly I believe was from
22 FEMA.

1 They are still asking that
2 glycerin should be moved from 605b -- I mean,
3 glycerin should be moved to 606, but there
4 should still be a 605b version in case, you
5 know, the other parts, their agricultural
6 glycerin is not commercial available. So that
7 was in the comments.

8 We, in my comments, I picked to
9 follow OTA's suggestion, and hoping that the
10 natural flavor houses in the future might be
11 able to phase into that, but it's not a simple
12 task as I understand.

13 And what I'm saying here is that
14 we're not discussing natural flavors now, but
15 when we do, we should take into consideration
16 as to how much organic glycerin is available
17 and all that stuff.

18 So I'm sure that that will be
19 debated and discussed when the natural flavors
20 come up for Sunset, I believe, in 2016 if I'm
21 not mistaken.

22 CHAIR RICHARDSON: Great, thank

1 you very much.

2 MR. AYKAN: You're welcome.

3 CHAIR RICHARDSON: The next
4 speaker is Bill Wolf followed by Allyson
5 Kelly.

6 MR. WOLF: First, I'd really like
7 to thank the four board members who have put
8 in incredible time and are leaving, and this
9 is your last meeting. And now I'd like to
10 address the board on two topics.

11 I'm Bill Wolf, and I'm -- I've
12 been active in the organic community for 43
13 years as an organic farmer, handler,
14 consultant, and input supplier, and attending
15 NOSB meetings for 22 years since the very
16 first meeting.

17 I'd like to talk about two things,
18 one on behalf of a Wolf DiMatteo client,
19 Draco, who submitted the petition to remove
20 glycerin from the National List but was not
21 able to attend the meeting today, and second,
22 I have a minor comment about the National

1 List.

2 Draco Natural Products supports
3 both of the listing motions recommended by the
4 handling subcommittee to remove glycerin from
5 605 and to list glycerin on 606. This will
6 allow commercial availability to apply if
7 there is not an adequate supply of organic
8 glycerin.

9 This addresses the concerns about
10 the availability of organic glycerin. I will
11 say that the process will fill in the gap over
12 the next couple of years while the rule is
13 implemented.

14 We support the use of organic
15 ingredients, but recognize that the allowance
16 for commercial availability will encourage
17 continued growth of the entire organic product
18 sector.

19 The handling committee also
20 addressed the classification of glycerin as
21 agricultural or non-agricultural, and offers
22 the conclusion that glycerin produced by

1 microbial fermentation is agricultural.

2 This is a good example of
3 agricultural glycerin, but it is technically
4 incomplete, and could be interpreted to mean
5 that only glycerin produced by microbial
6 fermentation is agricultural.

7 Glycerin produced using biological
8 or physical methods should also be classified
9 as agricultural. This would align with the
10 NOP's draft classification and materials
11 guidance issued in March of 2013.

12 It would also help address
13 concerns raised in public comment regarding
14 the use of glycerin in natural flavors and
15 made with organic products.

16 Therefore, we suggest that
17 agricultural glycerin should include all
18 materials derived from agricultural source
19 materials and processed using biological, or
20 mechanical, or physical methods described
21 under 205, 270a.

22 This is a technical, not a

1 substantive clarification. The public is
2 fully aware of the proposed changes to the
3 National List.

4 Draco produces its glycerin
5 organically because it is the right thing to
6 do supporting organic farmers, increasing
7 organic acreage, and the amount of organic
8 ingredients in final products.

9 Replacing organic -- replacing
10 synthetic glycerin with organic glycerin in
11 organic processed products supports the
12 principles of organic production and
13 continuous improvement.

14 Draco thanks the NOSB for your
15 dedication in the National Organic Program and
16 its role in advancing organic agriculture.
17 Please support the removal of glycerin from
18 605 and place it on 606.

19 This is the third NOSB meeting and
20 public comment period where this petition is
21 being discussed. Please do not postpone this
22 decision. It takes months, if not years, for

1 your decisions to be fully enforced by the
2 NOP.

3 Your decision now will give
4 manufacturers and ingredient suppliers the
5 transition time they need, and send a message
6 of commitment to continuous improvement.

7 Finally, we urge the NOP to
8 complete its work on the classification
9 materials guidance to avoid further confusion
10 and complexity in decisions on petitions.

11 Regarding the Sunset, I'd like to
12 make one comment. First, my mentor, Bucky
13 Fuller, repeatedly pointed out that the use of
14 the term Sunset was quite obsolete, an old
15 term from when we thought the earth was flat
16 over 500 years ago.

17 He offered other terms like,
18 "morning sunclipse," and, "evening sunclipse,"
19 as the correct term. So I think we need a
20 little perspective on the conversation here.
21 And second -- I'm done.

22 CHAIR RICHARDSON: Finish your

1 thought, Bill, please.

2 MR. WOLF: Thank you. Second -- I
3 guess I'll lose the t-shirt though.

4 CHAIR RICHARDSON: Yes.

5 MR. WOLF: Oh, well. Second, I do
6 not believe that there was any intention that
7 the National List be a specific size, or be
8 specifically shortened over time. I think it
9 should only have things on it that are in line
10 with the principles of organic, but it does
11 not need to be shortened.

12 There are way less non-organic
13 ingredients in organic foods today than in
14 2002 when the rule went into effect. We need
15 tools. Farmers need tools. Don't reduce our
16 toolbox. Thank you.

17 CHAIR RICHARDSON: Thank you.
18 Questions, comments? This is a quiet group
19 this morning. Good, all right, thank you,
20 Bill.

21 MR. WOLF: Sure.

22 CHAIR RICHARDSON: The next

1 speaker is Allyson Kelly followed by Alexis
2 Baden-Mayer.

3 MS. KELLY: Good morning. My name
4 is Allyson Kelly. I'm the Senior Program
5 Manager for Organic Compliance with the Hain
6 Celestial Group, one of the largest producers
7 of organic products in the world.

8 We wish to strongly support the
9 relisting of malic acid on 205, 605a. Organic
10 foods and beverages utilize malic acid for
11 acid control and flavoring. It is an
12 ingredient in a number of organic products
13 including some of our snack products.

14 Malic acid in stored seasoning
15 blends can help slow microbial growth at low
16 concentrations, while providing a smoothly
17 tart flavor that cannot be replicated by any
18 other ingredient on the National List.

19 Citric acid has similar qualities
20 for controlling acidity, but the astringency
21 and harsh taste are unacceptable for numerous
22 applications. Additionally, citric acid is

1 too hygroscopic for many dry seasoning blends.

2 Our sweet potato corn tortilla
3 chips contain malic acid. We have provided
4 samples on the table outside the door for you
5 to taste if you'd like. Maybe it's a little
6 early for chips, but maybe later.

7 L-malic acid is a nonsynthetic
8 product of fermentation, and has grass status
9 with the FDA. Malic acid also occurs
10 naturally in a variety of fruits and
11 vegetables.

12 Organic food manufacturers utilize
13 malic acid to produce the safe and flavorful
14 foods that consumers of organic products
15 expect and enjoy. Malic acid should remain on
16 the National List.

17 We wish to thank the NOSB for
18 their service. We also want to thank Miles
19 McEvoy and the dedicated staff at NOP for
20 their hard work and efforts to support organic
21 foods in the United States. Thank you.

22 CHAIR RICHARDSON: Thank you.

1 Questions, Harold? Sorry, not -- Jay?

2 MR. FELDMAN: Thank you. Thank
3 you for your comments. Can you share with us
4 any more detail on the fermentation process,
5 the feed stocks, and what goes into that?

6 MS. KELLY: Since I'm not the
7 ingredient -- I don't work really that closely
8 with the ingredient supplier, I don't have
9 that information handy, but I could probably
10 get that for you by the end of the day.

11 MR. FELDMAN: Okay, thanks.

12 CHAIR RICHARDSON: Other
13 questions? Thank you very much.

14 MS. KELLY: Thank you.

15 CHAIR RICHARDSON: Next speaker is
16 Alexis Baden-Mayer followed by John Ashby.

17 MS. BADEN-MAYER: Hi, I'm Alexis
18 Baden-Mayer. I'm the Political Director of
19 the Organic Consumers Association. And I'm
20 here to ask you, the Citizen Oversight Board
21 created by the Organic Foods Production Act,
22 to claim your power to restore the Sunset

1 process.

2 Normally, I would come to you to
3 deliver petitions from our members on various
4 decisions that you're going to make. For
5 instance, we collected over 12,000 signatures
6 and comments on a petition from our members
7 who took the time to tell you about Sunset
8 materials that they do not think should be
9 renewed. But there's really no point in me
10 bothering to do that at this time.

11 The Sunset Provision of the
12 Organic Foods Production Act has unlawfully
13 been suspended by the USDA National Organic
14 Program. Over 95,000 of our members have
15 signed a petition opposing the violation of
16 the law.

17 That's more people than have ever
18 bothered to take action on any other single
19 issue related to organic standards that we
20 have brought before our members, and it's not
21 just us. Food Democracy Now and Cornucopia
22 Institute have inspired just as many of their

1 members to act as well.

2 Amy Simpson of Beyond Pesticides
3 did an excellent job of explaining the ways in
4 which the NOP is violating OFPA, and the
5 authors of the act agree with her. The Sunset
6 policy change is in conflict with both the
7 letter and the intent of the statute.

8 The policy change turns the Sunset
9 Provision of OFPA on its head to create a
10 presumption that all synthetic materials on
11 the National List will be automatically
12 reviewed at the five-year Sunset mark, and to
13 establish a high hurdle, two-thirds vote to
14 remove the material from the list.

15 This is a complete reversal of the
16 statutory and longstanding policy on the
17 burden of proof that has required a two-thirds
18 majority vote in order to renew a material on
19 the National List. The authors of the law
20 never wanted to see synthetic or non-organic
21 substances used in organic with weak support.

22 Currently, every material on the

1 National List got there with a two-thirds vote
2 as required by OFPA. The Sunset policy change
3 means that in the future, National List
4 materials could be renewed with the support of
5 only six members of the board.

6 This is going to be terrible for
7 consumer confidence to know that the most
8 controversial ingredients are being used in
9 organic with the support of only a small
10 minority of organic stakeholders, probably the
11 stakeholders representing businesses that
12 profit from its use.

13 What should the NOSB do when the
14 NOP violates OFPA? Well, the most extreme
15 measure you could take would be to refuse to
16 review National List substances and allow them
17 to Sunset. The secretary might renew them
18 anyway, but that would be a clear violation of
19 OFPA that the courts would not uphold.

20 The other thing you could do is to
21 negotiate. You can use that power that you
22 have over the Sunset process to make the USDA

1 do the right thing. The USDA might reverse
2 course. They might leave Sunset alone, or
3 they could do what the authors of OFPA asked,
4 submit this substantive policy change to a
5 full notice and comment rulemaking.

6 And the other thing that you
7 should do is to insist that USDA limit its
8 proposal to future National List substances.

9 Everything that's currently on the
10 list got there based on the assumption that
11 it's coming off in five years. When the NOSB
12 voted on these substances, they couldn't have
13 known that the Sunset process would be made
14 toothless.

15 NOSB members have often justified
16 their votes by saying that the industry needs
17 time to move away from a synthetic substance,
18 and they have done so believing that future
19 renewals would be based on a vote of ten out
20 of 15 members of the board to review.

21 This is why we're the Organic
22 Consumers Association. We think USDA Organic

1 has the greatest potential to be the very most
2 meaningful standard.

3 CHAIR RICHARDSON: Thank you very
4 much, Alexis. Questions, yes, Jay?

5 MR. FELDMAN: Thank you, Alexis,
6 for your comments. How does OCA know what
7 consumers think?

8 MS. BADEN-MAYER: Well, we're in
9 communication with about two million of them.
10 That includes all of our social networks and
11 our email list. And like I said, this just
12 garnered so much attention from our members.

13 Usually, you know, compare what
14 we've got on current Sunset materials. We
15 usually collect around 12,000 signatures on a
16 petition related to a specific material in
17 organic.

18 You know, we're also sending our
19 list information about dangerous GMOs, and
20 pesticides, and factory farms, antibiotics
21 used in agriculture, like really hot topics
22 that people hear about on the news, care about

1 desperately.

2 And then we also tell them about
3 egg white lysozyme, and normally these issues
4 don't strike a chord. The change in the
5 Sunset policy is such a horrible violation of
6 the law, and it just smacks of indecency.
7 It's just so -- it's so different from
8 everything that's come before it.

9 Consumers see that change as
10 really significant. It's not just quibbling
11 over one ingredient. It's changing the whole
12 process to make it -- it's just -- it's
13 meaningless for me to be here today to talk to
14 you about any of the Sunset materials.

15 Our voice doesn't matter anymore,
16 and that's what our members are really
17 exercised about. That's why we had almost
18 100,000 people take action on this. That's
19 why Cornucopia and Food Democracy Now
20 collected the same number of actions from
21 their members.

22 This is a really big deal. This

1 is the biggest deal since the Congressional
2 changes to OFPA after the Harvey lawsuit which
3 was when I started my work on organic, and
4 this is when I'm going to end my work on
5 organic.

6 I'm not going to come back to NOSB
7 meetings. I don't think that there's really
8 any opportunity for the work that I do on
9 organic to be meaningful at this point. So,
10 but we'll be here.

11 Patrick Kerrigan is going to be
12 here. He's fresh. He's not as dispirited as
13 I am, and he's a nice guy. And I'm sure
14 you'll all enjoy his company. So I think
15 that, you know, we have hope like I said.

16 I think this is -- organic has the
17 potential to be the most meaningful standard
18 ever. It's because it's a democratic
19 standard. It's a public standard. It's a
20 standard of the people, by the people, for the
21 people.

22 I mean, no other standard can

1 compete. All of the other standards are
2 private standards. This is a public standard,
3 and it's a democratic standard, and that's why
4 it has the potential to be the best.

5 We're at a low point now, but I
6 think that, you know, Sunset was changed, and
7 it can be changed back.

8 CHAIR RICHARDSON: Any other
9 comments? Thank you for your passionate
10 speech, and I hope that you don't give up, but
11 be optimistic like so many of us are. Thank
12 you. The next speaker is John Ashby followed
13 by Thomas Harding.

14 MR. ASHBY: It's either
15 appropriate or ironic that I follow Alexis.
16 I feel like I need one of two things. Either
17 I need Paul Harvey to come up here and say,
18 "And now it's time to hear the rest of the
19 story," either that or "Ave, Jean. Morituri
20 te salutant!"

21 I'm John Ashby, and I approve this
22 message although some of you may not. John,

1 Joe, Jay, Wendy, thanks for your service, and
2 the rest of the board. Thanks for sending
3 them out with five years of growth. And may
4 it be so that the people who start next year,
5 when their five-year term is up, that they go
6 out with five years growth also.

7 I let somebody down. I want to
8 offer my personal apology to Miles for not
9 making the hearing session, and therefore, I
10 would have had the chance to offer a voice in
11 support of the National Organic Program.
12 Thank you and your staff for your work.

13 You guys are as responsible for
14 growth as the people doing the work, as the
15 board here is. And thank you for the legal
16 determination on Sunset that makes it require
17 a little more agreement to change the way we
18 make organic foods.

19 Now, to me, if you think organic
20 is good, you've got to tie the word growth to
21 it, and I do. And one of the things that's
22 really important about this board is the

1 decisions that this board makes affects how
2 organic is going to grow.

3 I'd like to suggest this should be
4 one of the, one of the, not the only, top
5 thoughts that you have as you're making these
6 decisions.

7 Now, you can make a decision that
8 negatively affects growth, but you should
9 understand how it's negatively affecting
10 growth, and you should understand in your
11 heart that you think that's worth it. I think
12 this is really important.

13 Let's take a look at gellan gum.
14 We had one case who got up here and spoke to
15 you about how she's going to lose, I can't
16 remember exactly what it is, somewhere around
17 40 million pounds if she loses this gum.

18 I think it's an important thing to
19 keep in your mind that when it's made so that
20 products can't be made organic anymore, it
21 doesn't mean the products come off the shelf.
22 It means the products on the shelf are

1 conventional and not organic, and that was
2 just one case.

3 When you lose the sales of the
4 milk and the products she was talking about,
5 you also lose the demand on the agriculture
6 that has to feed these cows. This is really
7 a huge, huge thing. We need to keep this in
8 mind when we're making these kinds of
9 decisions, similarly, with methionine.

10 Any pressure you put against the
11 chicken industry is going to reduce its
12 strength, going to reduce its demand on
13 organic agriculture. Again, there may be
14 reasons to do this. But please, make these
15 decisions while thinking about how it's
16 affecting the growth of this industry.

17 Gum trag is liable to end up being
18 a really interesting story. The story that
19 this is going to send to that person who's
20 going to lose his business - he said he's
21 going to lose his business if he doesn't get
22 the gum trag - is not to go into organic

1 business because you can't be sure what's
2 going to happen, and you can't trust what the
3 outcomes are going to be.

4 By way of confession, I'm a food
5 scientist, actually one of the experts in the
6 world at it, and I want to thank you all.
7 Please keep growth as one of the major things
8 to keep in mind because organic is worth it.
9 That's exactly four minutes.

10 CHAIR RICHARDSON: Thank you.
11 Well, the buzzer hasn't gone off though. You
12 forgot to do it? Okay, well, he does get the
13 magic wand today.

14 MR. ASHBY: My dogs barked at four
15 minutes.

16 CHAIR RICHARDSON: Questions,
17 comments, Harold?

18 MR. AUSTIN: As usual, great
19 presentation, John. You touched on, I think,
20 a point that we often overlook as we sit here
21 and we hold these deliberations, discussions,
22 robust conversations, where the organic

1 community, the stakeholders are today versus
2 where they were when all of these rules came
3 into effect.

4 And I think you touched on it when
5 you talked about growth. And one of the
6 things that we need to look at is how we
7 impact that. Could you explain or give us
8 your thoughts a little bit more in detail on
9 the growth as you've experienced it, of where
10 our organic industry was when all of this came
11 into fruition versus where it is now, and the
12 considerations of the impacts of the
13 deliberations that we --- on these things that
14 we have to decide?

15 MR. ASHBY: The impacts of the
16 what? I couldn't --

17 MR. AUSTIN: Well, on the
18 decisions that we're making, and how that --

19 MR. ASHBY: Okay.

20 MR. AUSTIN: -- impact maybe
21 varies a little bit today versus 20 years ago
22 because of the sheer size, the volume, and the

1 complexity of where organic now has grown to?

2 MR. ASHBY: Well, there's --- let
3 me give a little personal example. I won't
4 single the person out. But I can't even
5 remember how long ago this was. But I may
6 have developed the very first organic flavor
7 ever, it was a lemon flavor, years before
8 there was any organic rule.

9 I frankly have really not got any
10 idea if that would meet today's standards at
11 all, but it was, you know, it was the best we
12 could do at the time. It was a start.

13 And we've, you know, we've moved
14 light-years beyond that now, in terms of
15 looking at these things and seeing how it
16 works. However, you know, this was mentioned
17 at the meeting.

18 One of the things that happens
19 here is one sees a relative absence of
20 comments as a lack of interest. And I can
21 tell you for sure there's a lot of people that
22 are just plain afraid to come here. People

1 making organic food, their attorneys won't let
2 people come up here and talk. In some
3 regards, you should perhaps disregard
4 everything I'm saying, that I come up here and
5 say, proving my lack of common sense.

6 But like I said before, you know,
7 the growth of this is really crucial. I mean,
8 and it can't be taken --- it really can't be
9 taken lightly the impact you guys have on
10 this, all of you.

11 Every single time --- you know,
12 one way to look at this, in the absolute most
13 extreme, is this now it's a choice between
14 organic and 2,4-D. When the demand goes down
15 on organic, the demand on organic crops goes
16 down, and they become conventional.

17 This is where we are now. This is
18 really -- this is an element of the trade off.
19 It's a scary thing. It's a problem that you
20 can't get as much feedback as you need because
21 people are afraid to speak up. And some
22 people, like our gum trag guy just, you know,

1 he's busy running a business, you know.

2 CHAIR RICHARDSON: Harold, follow
3 up?

4 MR. AUSTIN: Follow up question.
5 How would you suggest that the NOSB, the NOP,
6 what can we do different to get a more
7 presence of equality of the various
8 stakeholders, and to remove the concerns or
9 the fears of those individuals that are afraid
10 to come here and speak on behalf of themselves
11 and their businesses or their farms? Is there
12 an easy solution to that or not?

13 MR. ASHBY: There is not an easy
14 solution to that. There's not an easy
15 solution. But, you know, if some of these
16 things that happen to people who do speak up,
17 if that were to be toned down, that would
18 help.

19 You know, what you've got is
20 you've got --- you've just got attorneys
21 rightfully afraid that their brands are going
22 to be destroyed by people because these kinds

1 of things happen. And it's a --- there's no
2 way you can tell them that's not a realistic
3 fear, there just isn't.

4 And so, you know, it comes down to
5 people without common sense, like me, who are
6 willing to stand up here and, you know, go
7 ahead, do what you want.

8 CHAIR RICHARDSON: Thank you,
9 John.

10 MR. ASHBY: Thank you.

11 CHAIR RICHARDSON: The next
12 speaker is Thomas Harding and will be followed
13 by Rebecca Thistlethwaite.

14 MR. HARDING: Good morning. First
15 of all, Madam Chair, what a good job you're
16 doing. The NOSB, those coming and those
17 going, we thank you very much for your very
18 important work, and it's not an easy job. And
19 Miles, your team is doing a good job. Accept
20 the criticism, build on it, but we thank you
21 all for that you do.

22 First of all, I want to remind you

1 that we leave the year of the farmer and we
2 enter the year of soil, the most important
3 part of organic production. Let's make sure
4 that we never forget that everything begins
5 there.

6 I'm here this morning just to talk
7 in support of a material, acidified sodium
8 chlorite, which is proposed to be added to
9 organic livestock production. It was removed
10 from the agenda last meeting, and I'm hoping
11 that, and I encourage you to move it to the
12 agenda for the next meeting.

13 And if there are any technical
14 aspects that are needing to be reviewed, as
15 the young lady from Organic Valley spoke
16 yesterday, we have people following me that
17 can really deal with the technical aspects.

18 This is a very important material,
19 and it's very important that we have options,
20 in fact, that we have qualified options.
21 There are very few when it comes to tit dips
22 for dairy men.

1 It's really important that we look
2 at it in the long term and the perspective
3 that it is a health and wellness thing, but it
4 also has a humane factor to it.

5 The other thing is, as I was glad
6 to see yesterday, that you've moved NPE to a
7 technical review. That's a very important
8 issue.

9 In many countries, particularly
10 where we were in the last week, the European
11 Union, Japan, they are totally prohibiting any
12 sanitation material or livestock material with
13 NPE. So, that study is really important. Pay
14 a lot of attention to it, and make sure that
15 we look at the big picture for the long term.

16 I'm looking forward to ASC hitting
17 the agenda at the next meeting. I encourage
18 you from the subcommittee, and committee
19 level, and on the NOSB level, to really
20 support this material for organic livestock
21 use.

22 Two quick points. I want to

1 remind everyone in here that in the growth of
2 this industry over the last several years,
3 particularly since 2011, has been incredible.
4 We've averaged over ten percent, in some cases
5 20 percent a year. That took place because of
6 this rule. The Beyond Organic concept that
7 it's better than organic is nonsense. We are
8 the only legal system. We have a framework.
9 We have the only fully documented system that
10 is transparent to the public through the
11 organic system plan, the inspection process,
12 the certification process, the compliance and
13 penalty process. Let's not forget what you're
14 building here.

15 The other thing is achievement is
16 incremental. We never thought that the
17 materials list would be an endless list, but
18 you should have seen it before the law. Every
19 certifier had a list of several pages.

20 So it's really important that you
21 recognize that these tools, these materials,
22 these processes, are incredibly important to

1 growth. Through innovation. Through building
2 strong industry and research, we'll improve
3 the material process so we can reduce the
4 materials list, but don't remove the tools.

5 Do not remove the tools that are
6 essential and that prove functional, that
7 meets the environmental criteria and meets all
8 of the aspects of the petition process. It's
9 really important that we understand where
10 we're going.

11 The idea that Beyond Organics can
12 stand up with any credibility to what the
13 organic legal system really represents, in my
14 opinion, is just not true. We need to build
15 on truth. We need to build on transparency.
16 We need to build on consumer education. But
17 let's not throw the baby out with the bath
18 water.

19 And let's promote the benefits of
20 organic, the values of organic, and the
21 importance of producers. It is really
22 essential that we do something about GMOs to

1 the point that we say to Mr. Secretary, as
2 I've said many times --- may I finish my
3 point?

4 CHAIR RICHARDSON: Yes.

5 MR. HARDING: Coexistence with
6 GMOs for the organic industry is not feasible.
7 The legal framework that the contaminator pays
8 is essential. Thank you all very much.

9 CHAIR RICHARDSON: Thank you for
10 your comments. Are there any questions? Yes,
11 Tracy?

12 MS. FAVRE: Thank you, Mr.
13 Harding, for your comments. I want to one,
14 let you know that we do plan to bring
15 acidified sodium chlorite to the agenda for
16 the spring meeting.

17 And as one of our farmers on the
18 Board says, on the farm it's called a tit, and
19 in the town it's called a teat, so we call it
20 a teat dip, just for the record.

21 MR. HARDING: Thank you very much.

22 MS. FAVRE: The question that we

1 had originally was about the multiple uses of
2 acidified sodium chlorite versus
3 chlorhexidine. Can you speak to that briefly,
4 please?

5 MR. HARDING: Following me is a
6 representative of the company that makes this
7 product, and we'll let him address
8 specifically your question.

9 But one of the things that's
10 really important is that all of the
11 environmental studies, everything that we've
12 done, when we looked at the list as general,
13 we found that really with the materials that
14 are on the list right now, sometimes they're
15 not optional because they contain other
16 materials that are prohibited.

17 So I'll wait for the gentleman
18 from Eco Lab to get specific into your
19 question. But what's really important with
20 what we're doing here is this is a proven
21 product.

22 It's environmentally a very

1 important product from the standpoint of
2 health and wellness for the animal, and
3 particularly for the well being. He'll come
4 up in about a half an hour, I think.

5 MS. FAVRE: Thank you very much.

6 CHAIR RICHARDSON: Any other
7 questions? Thank you.

8 MR. HARDING: Thank you.

9 CHAIR RICHARDSON: The next person
10 to speak is Rebecca Thistlethwaite followed by
11 Scott Rice.

12 MS. THISTLETHWAITE: Hello, my
13 name is Rebecca Thistlethwaite and I'm from
14 Mosier, Oregon. I'm a Policy Analyst for the
15 Cornucopia and a former organic poultry
16 producer. I'm here today to discuss two items
17 on the agenda.

18 The first is the Livestock
19 Subcommittee discussion document on livestock
20 vaccines made with excluded methods. The
21 second is the Sunset Review of sulfurous acid
22 that the Crops Committee and the full Board

1 must consider.

2 First off, I have to say it's very
3 disappointing that vaccines are the only
4 agenda item for the Livestock Subcommittee.
5 To see that methionine discussion is still
6 languishing in subcommittee is, frankly,
7 unacceptable. This is a critical issue to the
8 integrity of organic animal production and yet
9 we keep pushing it off.

10 On the positive side, I am happy
11 to hear that origin of livestock and animal
12 welfare regs are moving forward through the
13 pipeline. Miles, I encourage you to please
14 shepherd them through that process.

15 Back to vaccines, the discussion
16 document put forth by the Livestock
17 Subcommittee in August asked for more guidance
18 from the NOP on how to make a determination of
19 whether a vaccine has been produced with
20 excluded methods, so that it is not left to
21 the certifiers or MROs to make that decision.

22 Due to labeling inconsistencies,

1 confidential business information, and a
2 growing number of complex genetic engineering
3 techniques, it is next to impossible for
4 certifiers and MROs to determine if excluded
5 methods were used to produce a vaccine.

6 In 2012, the NOSB recommended that
7 the NOP help identify all vaccines registered
8 with the USDA as either GMO or non-GMO, and
9 produce a list that could help certifiers and
10 producers. The USDA, in their infinite
11 wisdom, said if they created this list, it
12 might imply there's something wrong with
13 vaccines produced with excluded methods, and
14 they were concerned about liability issues.

15 So, no list has been created.
16 Meanwhile, producers may be using vaccines
17 with excluded methods without knowing it, and
18 the NOP just turns a blind eye to this
19 situation. A further watering down of organic
20 integrity.

21 Now, onto sulfuric acid. I did a
22 lot of research on this material, finding

1 information that not even the technical review
2 mentioned. We wish the contractors producing
3 the TRs were compelled to be more thorough in
4 their research as well.

5 I want to support this material to
6 help growers combating alkaline soils in
7 irrigation water. However, the Crop
8 Subcommittee has not provided us with enough
9 information in order to keep this material on
10 the National List. There are still too many
11 unanswered questions regarding the human
12 health and environment criteria.

13 Sulfurous acid produced by burning
14 elemental sulfur and passing water over the
15 gas can be an effective technique to combat
16 alkaline soils in irrigation water. To
17 illustrate the size of the problem, the USDA
18 estimates that between 60 and 70 percent of
19 world's crop land has a pH over 7.

20 In just the state of Utah alone,
21 92 percent of soil samples that Utah State
22 University receives are over a pH of 7. So

1 this is a big problem, particularly in western
2 states, and it's a growing problem.

3 There's other techniques to deal
4 with alkalinity, but they each have their
5 limitations. For example, irrigation leaching
6 of salts below the root zone can help reclaim
7 acidic soils, but many growers in arid
8 environments are under water restrictions
9 where it's not possible to over-irrigate. It
10 can also leach out excess nutrients.

11 We learned from a couple sulfur
12 burner researchers that there are currently
13 few safety protocols nor safety maintenance
14 procedures in place with sulfur burners at the
15 farm they visited.

16 We also contacted the EPA and
17 Department of Air Quality. We found that
18 there are no regulations on these machines
19 even though they have some emissions of sulfur
20 dioxide, a potent greenhouse gas and source of
21 acid rain. Thank you.

22 CHAIR RICHARDSON: Any questions?

1 Okay, thank you. The next speaker is Scott
2 Rice, and followed by Mitch Blumenthal.

3 MR. RICE: Good morning. My name
4 is Scott Rice, and I'm the Accreditation and
5 Quality Manager for the Washington State
6 Department of Agriculture Organic Food
7 Program, the country's largest, oldest, and
8 best state certification program.

9 I serve as the Board Chair of ACA,
10 the Accredited Certifiers Association. An
11 association of 50 accredited domestic and
12 international certifiers and supporting
13 members from the organic community.

14 The ACA's mission is simple. We
15 are a member-based association of accredited
16 organic certifiers and supporters who value
17 certification. Our association collaborates,
18 educates, and advocates sound and sensible
19 implementation of the USDA organic
20 regulations.

21 While ACA has submitted comments
22 and documents for this meeting's agenda, I am

1 here to share some of the activities of our
2 association and the work that we do. Work
3 that seeks to expand partnerships in the
4 spirit of continuous improvement of the
5 organic sector.

6 I would first like to thank the
7 outgoing members for their work and dedication
8 to the organic integrity and the organic label
9 that each of us in this room shares. Also, a
10 warm welcome to the new members coming on
11 board. While you're not here yet, we look
12 forward to a productive partnership.

13 Partnership is integral to what we
14 do at ACA. We see ourselves as partners in
15 certification with fellow certifiers, seeking
16 consistent, rigorous implementation of the
17 USDA organic regulations.

18 We accomplish this through an
19 active list serv discussion, working groups
20 that bring together diverse voices and
21 geography, covering topics ranging from the
22 most recent instruction from NOP to proposed

1 documents on upcoming NOSB agendas, and
2 finally through our annual capstone event, a
3 certifier training held in conjunction with
4 NOP staff during which we deliver a dynamic,
5 interactive agenda that further builds on our
6 collective strengths and understanding of the
7 organic regulations.

8 Through this partnership, our
9 fellow certifiers, we now --- through this
10 partnership with our fellow certifiers, we now
11 see the least variances in interpretation of
12 the standards in a decade.

13 This partnership also extends to
14 our clients. While we are regulators, we
15 strive to see our clients succeed and organic
16 acreage grow. All the while ensuring that
17 organic integrity remains strong.

18 We do this by offering technical
19 assistance to our clients, connecting them to
20 resources so that they can better understand
21 and comply with organic regulations. As well,
22 we work continuously to improve our processes

1 and forms, seeking to streamline certification
2 steps.

3 One example of how we are doing
4 this is through the recent sound and sensible
5 contracts awarded by USDA. Certifiers and
6 technical assistance providers, such as the
7 International Organic Inspectors Association,
8 are embarking on exciting projects to break
9 down the barriers to certification.

10 ACA is collaborating with IOIA on
11 these endeavors, and WSDA is working on some
12 exciting projects of our own. So stay tuned
13 for more on that.

14 This brings me to my last point.
15 Under the leadership of WD administrator
16 McEvoy, and the support of Secretary Vilsack,
17 these partnerships are materializing and
18 growing stronger. We see organic standards
19 that are clearer and stronger than they've
20 ever been.

21 NOP has implemented a wide variety
22 of measures making the standards stricter,

1 held certifiers increasingly accountable
2 through more thorough accreditation audits,
3 while giving us the latitude to reduce
4 paperwork and cost burdens for the clients
5 that we serve.

6 ACA was pleased to partner with
7 NOP, the National Organic Coalition, IOIA, and
8 other organization in spring 2013 to kick off
9 the implementation of sound and sensible
10 initiatives, initiatives that now weave
11 through our everyday work.

12 There is still much work to be
13 done. We look forward to these continued
14 partnerships, and invite the NOSB to join us.
15 We invite you to tap into the deep wealth of
16 experience and knowledge of our membership,
17 and our connection to the organic operations
18 we serve.

19 As we continue to build the
20 partnerships essential to our collective
21 success, and strive for the highest standard
22 of organic integrity, know that we are a

1 resource ready to help. Thank you.

2 CHAIR RICHARDSON: Thank you.
3 Questions, comments, Harold?

4 MR. AUSTIN: Thanks, Scott. Could
5 you elaborate maybe a little bit on WSDA's
6 implementation of the sound and sensible
7 process during the inspection part of the
8 processes for, you know, looking at --- or
9 I'll say my Organic System Plan and stuff, to
10 incorporate and use that as a way to not just
11 look at that specific point where the
12 inspector is out there for our annual review,
13 to look at what we're doing for soil
14 amendments, for soil conditioning, for all of
15 that?

16 But how, with sound and sensible
17 now becoming a part, that that's --- your
18 inspectors are --- how are your inspectors
19 using that to look at our process over an
20 extended period of time for --- during our
21 point of review, annual review?

22 MR. RICE: Sure. We've really

1 shifted our focus to observation and
2 verification. You know that's always,
3 obviously, been part of our inspection
4 process, but it's easy to, as an inspector,
5 kind of get into the -- into your sort of,
6 making sure you've hit your check boxes and
7 your required fields.

8 But we've really put an emphasis
9 on kind of that kicking the tires approach of
10 you're walking through that orchard or that
11 field with the client, and you can see the
12 measures that they've put in place for soil
13 building, for increasing organic matter. You
14 know, a lot of our orchards you see the
15 prunings left in the rows, and you see that
16 degrade over time, and you come back the
17 following year and see that soil continue to
18 build.

19 As far as the sound and sensible
20 approach, it really --- you know, again, we've
21 moved away from requiring every last piece of
22 documentation to show that something's

1 happening.

2 Instead, maybe we verify that
3 something is happening through a standard
4 operating procedure that's understood by
5 everyone involved in the operation versus
6 having a slip of paper for every last clean
7 out. It's just understood in that operation
8 that this is something that is expected, is
9 understood, and is happening. Does that get
10 at it?

11 MR. AUSTIN: Yes, I think --- and
12 part of that is the looking at, as you've
13 implemented this sound and sensible, and
14 you're shifting away from --- there's still a
15 lot of the paper processes in place, but isn't
16 it true that your field staff has really
17 turned the focus into actually physically feet
18 on the ground, working with those entities
19 that they're certifying, the producers, the
20 growers, the handlers, to really ---- feet on
21 the ground, to look at the nuts and the bolts,
22 to ensure that everything that they say

1 they're doing, that they're actually, in fact,
2 doing?

3 MR. RICE: Oh, indeed, yes. We're
4 still looking at all of those control points,
5 and getting out in those fields, and seeing
6 what's going on there.

7 CHAIR RICHARDSON: Thank you. The
8 next speaker is Mitch Blumenthal followed by
9 John Brunnquell.

10 MR. BLUMENTHAL: Good morning, and
11 thank you. Madam Chair, in the sense of
12 humor, I'd like to start off with a short joke
13 if I can. Why did the conventionally grown
14 banana go to the doctor? It wasn't peeling
15 well. Gosh, I thought you'd all know that
16 one.

17 Anyway, good morning. My name is
18 Mitch Blumenthal. I'm a tree hugging, dirt
19 worshiper. A farmer. I'm a member of the
20 Organic Produce Wholesalers Coalition. I'm
21 also a citizen lobbyist for The Cornucopia
22 Institute.

1 I volunteered to help present
2 testimony because I want to ensure that the
3 integrity of organic food, specifically
4 organic produce, fruits and vegetables, is not
5 diluted.

6 I neglected to mention that I'm
7 also, as part of the OPWC, the owner of the
8 most significant distributor of organic
9 produce in the southeast, Global Organic
10 Specialty Source.

11 I want to first comment on the
12 excluded methods terminology discussion
13 document. Since the definition of excluded
14 methods was developed in 1995, several issues
15 have come to require further clarification.

16 These include: the use of
17 genetically mutated algae and untraceable
18 plant breeding techniques, such as double
19 haploid production, irradiation, chemical
20 mutagenesis, cell fusion, and embryo rescue.
21 Also the use of GMOs to make biodegradable,
22 bioplastic mulches. This is a big issue for

1 our growers, and something that needs to be
2 discussed further.

3 It reminds me at Eco Farm three
4 years ago, I attended a small meeting
5 regarding sustainable packaging for organic
6 produce, and we saw a great presentation. We
7 saw these beautiful, sustainable clam shells,
8 only to find out that they were made with GMO
9 corn.

10 So, as an organic produce
11 distributor, we had the question of, is it
12 better to have something that's biodegradable
13 yet made with GMO corn, or better to use a
14 foam tray which will sit in a landfill for a
15 long time? These are really important issues.

16 We do agree with the materials GMO
17 Subcommittee recommendation to keep the U.S.
18 organic regulations a process-based system,
19 including excluded methods.

20 Currently, educated consumers, and
21 I use that word educated, expect genetic
22 engineering to be absent throughout the entire

1 process of organic agriculture.

2 And I use that word carefully,
3 educated consumer, because as we know, a lot
4 of our consumers out there are not in the
5 organic world as we are day to day, and
6 they're not educated. We've made a commitment
7 to educate our consumers at our place of
8 business, and the OPWC has done the same.

9 I think Dr. Rangan's testimony
10 yesterday, and Max's presentation as well,
11 should be a real wake up call to everyone in
12 this room and at this table that this label
13 that we see before us is becoming diluted. We
14 can't let that happen.

15 The discrepancies of what's
16 expected in organic agriculture, and the
17 reality of what occurs must be addressed. For
18 example, genes from genetic engineering might
19 be detected in organic products because of
20 cross-pollination, or contamination in
21 transportation, or processing facilities.

22 Likewise, it will be ultimately

1 challenging, if not impossible, to exclude
2 genetic material created from techniques that
3 have been used in breeding facilities for
4 decades.

5 Genetic manipulation of plant
6 breeding materials has already occurred in
7 many crop varieties that are currently widely
8 used in organic farming. The commonly used
9 techniques include embryo rescue, mutations
10 through irradiation, exposure to chemicals,
11 and cell fusion.

12 Some of these techniques are no
13 longer traceable since they were used to
14 initial crosses, and have been passed down
15 through many generations. These techniques
16 are standard in the majority of public and
17 private plant breeding labs.

18 Likewise, there are many new
19 varieties in development that are using these
20 techniques. Wow, I shouldn't have started
21 with a joke.

22 (Laughter)

1 CHAIR RICHARDSON: We get the idea
2 though.

3 MR. BLUMENTHAL: You get the idea.
4 Thanks for allowing me to give testimony. If
5 you have any questions on the excluded methods
6 terminology, feel free to speak to the
7 scientists at Cornucopia. If you have any
8 questions about organic fruits and vegetables,
9 feel free to speak to me.

10 CHAIR RICHARDSON: Great, thank
11 you so much. Thank you.

12 MR. BLUMENTHAL: No questions?

13 DR. TAYLOR: Do you have more?
14 Did you --- can you complete your thought?

15 MR. BLUMENTHAL: It's mostly
16 technical. I think you guys got the idea.

17 DR. TAYLOR: Okay, great.

18 MR. BLUMENTHAL: Yes, but thank
19 you.

20 DR. TAYLOR: You're welcome.

21 MR. BLUMENTHAL: Thank you.

22 CHAIR RICHARDSON: So we have John

1 Brunnquell, and we'll take a ten minute break
2 following John's presentation.

3 MR. BRUNNQUELL: Good morning.
4 Today I'd like to talk to you about three
5 issues facing the poultry industry:
6 methionine, NGMO vaccines, and outside access
7 -- if I can get this to advance.

8 John Brunnquell, I've been in the
9 egg industry for 27 years, President of Egg
10 Innovations. One of the unique things we
11 bring to the egg industry is 100 percent of
12 our birds on a commercial basis go outside, on
13 the ground, engage in natural behavior, dust
14 bathe, scratch and the like.

15 So the comments I bring about
16 methionine, I will bring a frame of context to
17 it that we provide outside access, pasture,
18 and natural behavior.

19 I've heard over the last several
20 months commentary from some members of the
21 Board that we need to keep pressure on the egg
22 industry to find alternatives to methionine.

1 I would contend it's the opposite. The egg
2 industry needs to bring pressure to you.

3 We've set a bar at two pounds, and
4 this is feathering at three pounds. This is
5 feathering at two pounds in the same
6 environment. We've set that at the NOSB
7 level.

8 However long you haggle or debate
9 the issue of average versus cap, it doesn't
10 change the fact that the industry is out there
11 dealing with animal welfare issues today. And
12 if you do not deal with this issue until next
13 spring, for another six months we will deal
14 with these issues. We will deal with them.
15 But we contend that the issue is with this
16 Board to allow us an average, and to do it
17 very rapidly. In our opinion, support the
18 cap.

19 The second issue is NGMO vaccines.
20 Specifically what I want you to be aware of is
21 salmonella enteritidis is a vaccine that is
22 based off of GMO technology.

1 Second, I'd like you to understand
2 that as of January 1st, 2015, it is the law of
3 the State of California that all organic
4 birds, and all birds in general, will be
5 vaccinated with an SE vaccine or you do not
6 sell those eggs in California, and that is the
7 law.

8 As such, if you eliminate NGMO
9 vaccines without an alternative, organic eggs
10 don't exist in California. So we are
11 supportive of the elimination of GMOs, but
12 provide us a commercial alternative first.

13 The last issue I want to talk
14 about is outside access. We believe that
15 birds that are producing organic eggs belong
16 outside, on the ground, on soil, with
17 significant access. USDA and NOP, please
18 finish that job. Thank you.

19 CHAIR RICHARDSON: Thank you,
20 John. Questions? Tracy?

21 MS. FAVRE: Thank you for your
22 comments and for bringing us some photographs

1 so we can really visualize what these
2 restrictions might have -- the impact they
3 might have.

4 Could you address your thoughts
5 towards -- we heard comments earlier today
6 that there has been some studies done that
7 basically don't show the negative impact with
8 reductions in methionine as we're hearing?
9 And so, as a Board, and as a Livestock
10 Committee, we're getting sort of conflicting
11 information and we need some help
12 understanding that.

13 MR. BRUNNQUELL: And we truly
14 understand the conflicting information you
15 receive. I'll try and say it as simply as I
16 can.

17 The Board, and anyone else in the
18 industry, has an open invitation to see our
19 facilities. All of our facilities have a
20 minimum of ten square feet outside, and they
21 go up to 50 square feet outside. All of our
22 facilities allow the birds to dust bathe,

1 perch, scratch.

2 We'll show you the diets, and
3 we'll show you birds that are on non-organic
4 diets with three pounds. We will show you
5 organic birds, two pounds. They have no
6 different production regimen. They are both
7 managed the same way.

8 And we will point out the
9 differences to you on animal welfare issues,
10 whether it is feathering --- I'm in a northern
11 climate, Indiana, so I'm about to enter the
12 cold weather season. So I'm going to deal
13 with elevated levels of ammonia and, because
14 I have to put higher levels of protein in the
15 diet, it only exacerbates the issue.

16 And so, what we're saying to
17 everybody is we are happy to open our doors to
18 give people a firsthand visual so that we're
19 talking with facts in a real world environment
20 rather than speculation or reports from
21 another country.

22 CHAIR RICHARDSON: Francis?

1 MR. THICKE: Thank you for your
2 comments. Yesterday, a representative from
3 the poultry industry said that in about 80 of
4 the birds do not show any problem with
5 methionine at the levels now, but 20 percent
6 do, and he didn't have any explanation for
7 that. Do you have any thoughts about why some
8 do and some don't?

9 MR. BRUNNQUELL: A number of
10 factors come into play, and I wouldn't
11 disagree that it's not a universal issue. It
12 depends on your nutritionist, because each
13 producer has a separate poultry nutritionist
14 and they'll have their different philosophies
15 on nutrition.

16 It will depend on climate. If
17 you're a producer in southern California
18 versus Michigan, we deal with different, you
19 know, weather issues. And so, a lot of
20 factors weigh into the issue.

21 And it depends on what outside
22 access means. When you say 80 percent of the

1 organic birds don't have an issue potentially,
2 we have a full plethora of what outside access
3 and what the living environment in current
4 organic standards mean.

5 So it's a very dynamic issue. It
6 isn't a single topic that is cause and effect,
7 that you can eliminate this one issue and you
8 solve the problem.

9 MR. THICKE: So do you think that
10 access to the outdoors does help change it?

11 MR. BRUNNQUELL: Clearly. We've
12 transitioned 100 of our -- even our non-
13 organic birds. We believe that strongly in
14 outside access.

15 MS. FAVRE: So we also heard
16 comments earlier today that this is not an
17 animal welfare issues, that it's a production
18 issue. Can you speak to that, please?

19 MR. BRUNNQUELL: Yes. My
20 background is I grew up on a poultry farm, 27
21 years in the industry, a master's degree in
22 poultry science, and looking at 40 farms every

1 week.

2 I'll show you pictures. I'll show
3 you quantitative data. It is an animal
4 welfare issue that we can score and we can
5 measure.

6 CHAIR RICHARDSON: Colehour?

7 MR. BONDERA: Thank you, and thank
8 you, John, for your presentation. I think you
9 bring up important observations and
10 experiences.

11 I wanted to ask you, based on what
12 you chose to present, if you would be willing
13 to address the question that we, on the
14 Livestock committee -- Subcommittee, have to
15 address? But also has been brought up, which
16 is --- I think, from your presentation, it was
17 interesting that you chose to talk about the
18 non-GMO vaccines need to be available if we're
19 going to talk about GMO vaccines because
20 vaccines are necessary, and then that same
21 question.

22 And this isn't exactly about

1 methionine because I think the question is
2 synthetic methionine, and that wasn't really
3 emphasized because I think that's a critical
4 thing to point out. When you were presenting,
5 I wanted to add that word to your
6 presentation, but that's not my point.

7 My point is, what do you think, or
8 can you address your observation or experience
9 with the development or pursuit of
10 alternatives to the synthetic methionine that
11 have come up a little bit in the
12 conversations, but also you must be fully
13 aware of, and how those could, or should, or
14 will be impacting the industry in your
15 opinion? Thank you.

16 MR. BRUNNQUELL: I serve on the
17 United Egg Producers Organic Egg Committee,
18 and I travel with that circle of producers.
19 I serve on the Board of Directors of the
20 Organic Egg Farmers of America, and I travel
21 in that circle of producers.

22 We talk about this as an industry

1 relentlessly. I serve on the Methionine Task
2 Force. We have an incredible desire, as an
3 industry, to find an alternative. I will be
4 the first one to -- when a commercially
5 available alternative is available, we will
6 move there.

7 It's not a cost issue. It's
8 nothing more than there is not a commercial
9 available application. And it's not bugs, and
10 it's not worms, and it's not high methionine
11 corn.

12 What we fail to remember is at
13 this point, there are 10 million organic
14 layers in the United States. Then you add the
15 broilers and other avian species. Commercial
16 availability is a very significant topic when
17 you run the math.

18 And so, while we see these studies
19 done in labs and in micro settings that have
20 theoretical results, when you take them out to
21 the scale of organic in the United States,
22 they are not sustainable at this point.

1 Having said that, that does not at
2 all relieve our desire to find a solution, and
3 we will aggressively, as an industry, pursue
4 it on an ongoing basis.

5 CHAIR RICHARDSON: Wendy?

6 MS. FULWIDER: What do you think
7 will happen to your industry if this Board
8 takes methionine away from you?

9 MR. BRUNNQUELL: What will happen
10 to the industry is a couple of things, at
11 least in our opinion.

12 Number one, the birds will still
13 live. They'll lay less eggs. There will be
14 higher mortality. They will be other
15 operational issues. That will lead to an
16 elevated cost of organic because, as an
17 industry, we will pass along those operational
18 costs.

19 So a portion of the industry
20 that's not prepared to deal with it will
21 dissipate, and a portion of the industry will
22 simply arrive at a price point that, if it's

1 the rule of the land to operate in that
2 environment, we'll comply.

3 But we will recognize that it
4 isn't what's best for the birds. It doesn't
5 meet our charter of being concerned about the
6 animal, but we will follow it, and we will
7 adjust prices accordingly, and pass those
8 prices along.

9 CHAIR RICHARDSON: Thank you.
10 We'll take a ten minute break now, so
11 synchronize your iPhones. It's 10:39 on mine,
12 so that --- if you add on ten, that's when
13 we'll come back, and we'll start promptly with
14 Alesia Bock. Thank you.

15 (Whereupon, the above-entitled
16 matter went off the record at 10:39 a.m. and
17 resumed at 10:51 a.m.)

18 CHAIR RICHARDSON: The first
19 speaker is going to be Alesia Brock and before
20 she says her comments, I know that Mac has an
21 important announcement to make.

22 MR. STONE: So the standing at

1 this time, John Ashby is the lone winner of
2 the timing of public comment. His timing was
3 impeccable at four minutes. So John, don't go
4 away without your tremendous gifts.

5 Bill Wolf and Rebecca

6 Thistlethwaite both stopped immediately upon
7 the red light and the respect for the time.
8 So both of them each get one of our wonderful
9 prizes. And there's more if you can achieve
10 it.

11 CHAIR RICHARDSON: So the
12 challenge is on for Alesia Bock who's going to
13 come up next, followed by Jim Winter.

14 MS. BROCK: All right, thank you.
15 Hello Madam Chair and members of the Board.
16 Thank you for the opportunity to provide
17 comments today.

18 My name is Alesia Bock. I'm with
19 Agrosystems International. And I'm providing
20 comments today to the Board and the Livestock
21 Committee regarding acidified sodium chlorite
22 or ASC.

1 While I understand that ASC is not
2 specifically on this meeting's agenda, I'm
3 appreciative to hear that it will be on next
4 spring's agenda. And I'm here to support our
5 -- support the petition to add ASC as a
6 synthetic substance allowed for use in organic
7 livestock production in Sections 205-603 of
8 the National List.

9 During the NOSB meeting earlier
10 this year, several members asked for
11 additional technical information on this
12 material regarding two questions. Chlorite
13 residues in milk and work place exposure to
14 chlorine dioxide generated during teat dip
15 mixing and application.

16 That data was submitted to the NOP
17 and NOSB immediately after last meeting. In
18 addition, the material expert is here today to
19 answer any further technical questions that
20 you have. And I believe he's coming up after
21 me.

22 At the spring meeting, NOSB also

1 suggested that it would be helpful to hear
2 from organic dairy producers regarding their
3 need for the alternative teat dip product and
4 not just from the manufacturer. Yesterday,
5 you heard from Organic Valley regarding their
6 support for the addition of ASC to the
7 National List.

8 Today I am submitting 87
9 additional petition signatures on behalf of
10 organic dairy producers representing six
11 states in a wide geographical area. From the
12 west coast through the mid-west to the east
13 coast.

14 These petitioners have agreed that
15 this alternative teat dip material is
16 necessary due to limited viable alternatives
17 currently available. And it is a necessary
18 tool to keep their herds healthy and avoid the
19 need for antibiotics.

20 In conclusion, we respectfully
21 request that NOSB consider these additional
22 petitions in favor of adding ASC to the

1 National List, Section 205-603 for use in
2 organic livestock production. Thank you for
3 your time. Thank you for your service on the
4 Board.

5 CHAIR RICHARDSON: Thank you.
6 Questions? Thank you very much.

7 Next speaker is Jim Winter and it
8 will be followed by David Bruce.

9 MR. WINTER: Good morning, Madam
10 Chairman and Board. Thank you very much for
11 the opportunity to speak to you again.

12 I was here last spring supporting
13 acidified sodium chlorite, ASC for use in teat
14 dips for use on organic dairy farms. During
15 that presentation, I did receive some
16 questions. Alesia just commented on those.

17 I thought I would follow up a
18 little bit for those of you that did not get
19 the information with those questions and a
20 little backup information. And then open up
21 for further questions about this technology.

22 First of all, there was a question

1 concerning the potential chlorine residue in
2 milk. Chlorine residues in milk while using
3 acidified sodium chlorite teat dips have not
4 been a concern because chlorite residues were
5 non-detectable in extended herd studies and
6 chlorite is not persistent in milk changing to
7 chlorite that is already present in milk.

8 I gave two examples in the
9 information. My technical support team went
10 through the data and we gave two examples.
11 One of those was a Cornell study where a
12 sodium chlorite teat dip 4XLA was used pre and
13 post and milk samples were gathered and then
14 tested for chlorite and there was none
15 present.

16 There was a second reference to a
17 paper that was presented at National Mastitis
18 Counsel related to a measuring chlorite in
19 milk. And the fact that once it is in milk,
20 it immediately over a very short amount of
21 time will convert to chloride which is salt,
22 which is what our claim was made when I made

1 the presentation.

2 The second question was around the
3 potential workplace exposure to chlorine
4 dioxide. Which is what is -- a gas that is
5 given off when acidified sodium chlorite
6 starts to degrade.

7 Chlorine dioxide is a
8 water-soluble gas that has an odor similar to
9 that of chlorine. It is an oxidizer and has
10 been used as an antimicrobial for various
11 applications, one such as teat dips. And
12 that's for the last 25 years.

13 To backup that information, I did
14 present data from an on farm study that was
15 run looking at chlorine dioxide release. And
16 whether that was an issue. The data would
17 show that in the study, the detection devices
18 had to be within four inches of the product to
19 exceed any detection limits.

20 And when you're typically mixing a
21 teat dip, it essentially, you're at arms
22 length away. So at that particular level,

1 there was no minimum detection showing.

2 The last question that came up, it
3 did not come up at the meeting, but it's come
4 up since then, is the difficulty of mixing the
5 activator and base components of the acidified
6 sodium chlorite test dips. I think you're all
7 aware that acidified sodium chlorite
8 essentially is activated by taking an organic
9 acid, primarily lactic, mixing it with sodium
10 chlorite and producing the acidified sodium
11 chlorite.

12 There is a slight chlorine release
13 which we talked about. That particular
14 mechanism of mixing, some people find that to
15 be an added piece of work that they really
16 don't like.

17 Over the years, and I've been in
18 this -- selling this particular product in
19 manufacturing for the last 20 years, we have
20 developed many ways to do that. Everything
21 from the simple of mixing 50/50, shaking it
22 and using it. To sophisticated pumping

1 mechanisms that are controller based, that
2 have flow meters on them that you can actually
3 program them and they will actually inject or
4 send the product mixed and activated to the
5 parlor. So there are ways to work around that
6 particular issue.

7 Essentially, the question came up
8 earlier, which I'll respond to right now and
9 then you can ask me later. And I think I
10 heard the question right, is what is --

11 (Time buzzer.)

12 MR. WINTER: I'll stop right now
13 and then answer questions.

14 CHAIR RICHARDSON: Did you want to
15 finish that sentence?

16 MR. WINTER: Okay. I was just
17 going to say that the question was related to
18 how does ASC and chlorhexidine compare. Both
19 are germicides. But their mode of action is
20 very different.

21 Where ASC is an oxidizing agent
22 that essentially penetrates the cell wall and

1 blows it apart, chlorhexidine attaches to the
2 cell wall and disrupts cell integrity.
3 Therefore, their mode puts them using for
4 different uses.

5 Acidified sodium chlorite is very
6 broad spectrum. It's used in a lot of
7 different places. It's used for treating
8 water in place of chlorine. And it's also
9 used as you know, and it's approved for use on
10 treating as an antimicrobial on food
11 substances.

12 Chlorhexidine is primarily used as
13 a disinfectant. It is used in teat dips. But
14 it also is primarily used a lot in surgical
15 procedures as far as treating wounds and
16 treating sites where there will be surgeries
17 taking place.

18 Chlorhexidine has never been
19 approved for broad use as far as treating any
20 type of food for two reasons. Number one, its
21 mode of action is not as broad spectrum. It
22 doesn't kill a lot of gram negatives.

1 Especially pseudomonas. And secondly, its
2 profile when it breaks down, there is some
3 concern about what breaks down as far as
4 what's left over after using chlorhexidine.

5 Any other questions?

6 CHAIR RICHARDSON: Other
7 questions? Frances?

8 MR. WINTER: Yes, Frances?

9 MR. THICKE: Thank you. Did you
10 -- did I understand right that you said that
11 when it's mixed, there is no detectable
12 chlorine or there is --

13 MR. WINTER: No, no. I said when
14 it's mixed, there will be a little bit of
15 chlorine, you'll get a chlorine smell.

16 MR. THICKE: Okay. But when you
17 said there's four inches, you could detect it.
18 That's after it's mixed right?

19 MR. WINTER: Oh yes. Yes. We
20 actually did a study where the product was
21 mixed. And then we actually sprayed it. And
22 we found that the only way we could pick up

1 the detectable level of chlorine dioxide was
2 within four inches of the mix -- of the actual
3 vessel.

4 MR. THICKE: So that's after it's
5 mixed.

6 MR. WINTER: Yes.

7 MR. THICKE: But during mixing,
8 did you measure the detectable chlorine
9 release then?

10 MR. WINTER: Well what we were
11 doing was we were mixing it and actually using
12 it in a parlor where we were applying it with
13 a sprayer.

14 MR. THICKE: Okay.

15 MR. WINTER: And we had a device
16 to measure at the level of the neck, and we
17 had one in the parlor. And so it was autom --
18 it was being mixed regularly as it was being
19 atomized into the air. And we didn't have any
20 detectable problems with chlorine dioxide.

21 CHAIR RICHARDSON: Any other
22 questions? Thank you very much.

1 MR. WINTER: Thank you.

2 CHAIR RICHARDSON: Next speaker is
3 David Bruce. And he'll be followed by
4 Lawrence Datnoff.

5 MR. BRUCE: Good morning
6 everybody. My name is David Bruce. I work
7 for Organic Valley. I'm the director of the
8 non-dairy pools there, which means eggs, meat,
9 produce and soy. I'm also co-chair of the
10 Methionine Task Force and one of the founders
11 and board members of the Organic Egg Farmers
12 of America.

13 I had thought about starting out
14 this morning following the lead of Professor
15 McIlvoy and -- who was my entomology professor
16 25 years ago and making everybody stand up and
17 act like their favorite chicken. But I'm
18 going to pass on that since four minutes is
19 really short.

20 I also just wanted to say I was
21 really appreciative of Jim Pierce's comments
22 yesterday. I really think that it's time to

1 move beyond the atmosphere of contention and
2 acrimony and sort of blame that's been hanging
3 in the air and work together to further things
4 to the best of our ability. So I really look
5 forward to doing that. So thank you Jim.

6 I was also thinking about ten
7 years ago when Jim left Organic Valley and he
8 walked into my office with a big box full of
9 folders on methionine and said good luck
10 David. So, thanks a lot Jim.

11 A couple of things before I hit on
12 methionine, one is I really appreciate OTA's
13 interpretation on gellan gum and couldn't
14 agree more. As director of our soy program,
15 it's a really important thing for us.

16 We are pleased with the way we've
17 been able to reformulate and we don't have
18 consumers' claiming the sky is falling because
19 it's in there. So we'd like to continue
20 listening.

21 And in terms of made with excluded
22 methods vaccines. I really appreciate the

1 depth to which the livestock committee has
2 gone into this. And the ask for guidance from
3 the program. I do want to be careful about
4 any language where they're only allowed under
5 emergency situations.

6 You know, as other people have
7 said, organic farmers have very few tools.
8 And it's really important that we don't take
9 those away. Especially given the FDA mandates
10 to be SE free and that kind of thing. So it's
11 a complicated subject. But I really urge the
12 continued allowance of the avian salmonellas
13 vaccine.

14 Just quickly, I couldn't be more
15 pleased that the NOP is taking up the animal
16 welfare recommendation from 2011. I first
17 testified on outdoor actives for chickens in
18 Chicago in 1994. So it's exciting to see some
19 progress on that.

20 I do think that it's a very
21 complicated recommendation in that you know,
22 the economic impact study had a doubtful

1 conclusion. So really looking forward to
2 seeing how that moves forward.

3 On methionine, it's really
4 disappointing for me that not only has
5 methionine been the sort of poster child for
6 synthetics in livestock production. But it is
7 now the victim of the sunset politics and
8 posturing.

9 It's really disappointing that
10 that surrounds the conversation because it's
11 not so complicated. And I really would like
12 to think that we could have collaboration
13 together.

14 You know, NOC's proposal on black
15 soil fly larva and CFS's suggestion for that.
16 You know, it's a great idea. When we've
17 looked into it, FDA was not pleased with the
18 idea of feeding that. And AAFCO felt like it
19 was an adulterated feed.

20 So you know, if there are
21 alternatives, let's work on them together.
22 We've done trials on potato protein that we

1 brought in from Europe. We've used the high
2 methionine corn to see what's possible. But
3 in the meanwhile, it's true that farmers are
4 suffering.

5 Feather pecking is a misdirected
6 foraging activity. But it only becomes
7 harmful when the birds are hungry for
8 additional protein. And so yes, you can feed
9 additional protein, but then you're dealing
10 with an environmental issue with a high
11 ammonia in the house.

12 So I do think we can come to
13 solution together. And I'm all about ideas.
14 I'd like to see both sides working together.
15 It's not like industry is trying to get away
16 with something. This isn't about enhanced
17 production. This is the about the well being
18 of the animals.

19 I was going to bring photos, but
20 then sort of scared myself off. Feather
21 pecked chickens you know are nasty looking.
22 I didn't want to project naked birds onto the

1 screen.

2 It's -- dealing with farmers, we
3 have 96 egg farmers. And dealing with farmers
4 that are struggling with the feather pecking
5 issue as a result of inadequate nutrition from
6 the beginning is frustrating, so.

7 CHAIR RICHARDSON: Thank you.
8 Questions? Tracy?

9 MS. FAVRE: So I might put you
10 slightly on the spot, so forgive me.

11 MR. BRUCE: Sure.

12 MS. FAVRE: If you had a choice of
13 showing photos of your feather pecked chickens
14 versus explaining to a consumer the
15 possibility of using a synthetic essentially
16 supplement to the feed, which would you think
17 would be more palatable to your customers?

18 MR. BRUCE: I would have no
19 problem explaining it to a customer. You
20 know, if my math is right, a chicken over a
21 year's lifetime will eat .1365 pounds of
22 synthetic methionine. I'm not concerned about

1 that.

2 It's much more about the overall
3 well being of the bird. The environment they
4 live in. The organic feed they're consuming.
5 The outdoor area they're living in.

6 So I'm not shy about it. It's
7 such a minute amount it's not a big deal.

8 CHAIR RICHARDSON: Other
9 questions? Thank you very much.

10 Next speaker is Lawrence Datnoff
11 and he'll be followed by Kelly Pepper.

12 MR. DATNOFF: Okay, Lawrence
13 Datnoff, I'm a professor of plant pathology.
14 I'm here to talk about silicon as it relates
15 to plant diseases and aqueous potassium
16 silicate.

17 See the term silicon, Si is the
18 element. Silicate is SiO₂, like sand
19 silicates or SiO₃, they're -- when combined
20 with certain cationic elements like calcium and
21 potassium, and silicic acid is the form the
22 plant takes up.

1 This is a dynamic cycle showing
2 how silicon gets into the soil. You have from
3 polymers, essential oxides, minerals and
4 soils, irrigation water, but it can be leached
5 out. There's a weathering sequence in
6 different soils and so silicon can move out of
7 the system.

8 If you look through the
9 continental United States, there are a number
10 of soils that are deemed to be lower limiting
11 in this element. And you can see alfisols in
12 the southeast, the inceptisols in the
13 northeast and west and entisols.

14 The way that silicon enters into
15 the plants is through silicic acid. There's
16 transporter genes that have been identified,
17 it moves from the soil into the xylem.
18 Translocates up to the xylem.

19 In a plant like rice, it
20 polymerizes in the first leaf therefore it's
21 no longer available. A number of other plants
22 have now been shown to have transporter genes

1 too. Barley, maize, pumpkin, soybean, wheat.

2 Plants vary in their capacity to
3 accumulate this element. Wetland grasses
4 between 4.6 to 6.9 percent. Dryland around in
5 the one. And dicots are much lower. And
6 there's over 100 families that have been shown
7 to accumulate this element.

8 And there's really no
9 non-accumulators. So silicon has a tremendous
10 effect on biotic stress whether it's plant
11 diseases or insects. And also alleviating a
12 lot of abiotic stresses.

13 Here's an example, blue line
14 susceptible, white line partially resistant,
15 the magenta line is completely resistant. You
16 can take a susceptible cultivar, push it to
17 the same level as a partial resistance. You
18 can take a partial resistance cultivar and
19 push that level of resistance almost to the
20 same as complete genetic resistance.

21 How does that work? We think one
22 idea is mechanical barrier hypothesis. The

1 fungus lands tries to penetrate and there's no
2 infection. But we've been able to show that
3 you can reduce lesions with silicon. And
4 their minute size.

5 And you can see the empty cell,
6 that's a fungal cell. It looks like a
7 vacuole. And it's surrounded by this
8 amorphous material. It's phenolic in nature.
9 Phenols have antimicrobial properties.

10 Similarly, we found glucanases,
11 beta 13 glucanase. Fungi had glucan in their
12 cell wall. Glucanases attack fungi.

13 Here's an example showing foliar
14 application of silicon versus root
15 application. You can see the root worked
16 better than the foliar in these two different
17 systems. Brown spot on rice, soybean rust.

18 If you look at the brown spot on
19 rice a little closer, this is x-ray
20 microanalysis. If you look on the far left,
21 you look at the root silicon and the foliar
22 silica, the x-ray microanalysis is pretty

1 similar.

2 But when you look on the underside
3 of the leaf which is on your right, you see
4 that the root -- the foliar silica is just
5 like the control. Which means that the
6 silicon was just sitting on top of the plant
7 tissue. It wasn't entering.

8 And here's an example of that.
9 The blue bar shows you can quantify the
10 silicon in the plant tissue, it accumulated.
11 And in the other two it did not. So it was
12 just sitting on top of the leaf surface.

13 So how does it work in disease
14 resistance? It probably plays a passive role
15 because you do get deposition below the
16 cuticle. But it's not continuous. So once it
17 gets through that cuticle, there's a mediator
18 response and all these defense sponsors are
19 up-regulated and they're active.

20 And so it plays an important role
21 in the suppression of plant diseases. Aqueous
22 potassium silicate has been shown

1 experimentally and under field conditions to
2 do so.

3 And I think producers need as many
4 alternatives as they can to control their
5 plant diseases. And if you look at something
6 like copper, it's toxic to soils over time.
7 Sulfur can burn. But those are two allowable
8 substances.

9 Potassium silicate is a great
10 alternative.

11 CHAIR RICHARDSON: Oh, right on
12 the buzzer, Mac. Did you get that one? All
13 right, questions? Jay?

14 MR. FELDMAN: Can you talk more
15 about this being an alternative to the copper
16 sulfate or other materials that we're trying
17 to reduce in some context?

18 MR. DATNOFF: Well, you know,
19 potassium silicate could be used in
20 conjunction you know, if copper is maybe more
21 effective. I can't say if it is more
22 effective or not effective. But it's an

1 alternative that could be used in a systems
2 approach.

3 So potassium silicate could be
4 used to process -- to suppress a disease as
5 similarly as copper could. So if you're using
6 potassium silicate in that system, you could
7 reduce the number of applications of copper.

8 And maybe even sulfur too. So, in
9 any system, if you want to manage plant
10 diseases, you want to look at the system as a
11 whole as you do in organic systems. You want
12 to look -- use the best host/plant resistance
13 that you can find.

14 You want to make sure that your
15 nutrition -- nutrition is the first front line
16 of plant defense. And we're starting to find
17 out in many cases, not only with silicon, but
18 with other elements, that you know, you have
19 a certain range that you need for plant
20 growth.

21 But when that plant is under
22 attack by a pathogen, then the requirement for

1 that nutrient can go up. So you may need to
2 actually need more. Okay, so the nutrition is
3 the first front line of defense.

4 CHAIR RICHARDSON: Zea?

5 MS. SONNABEND: Thank you for the
6 information. I've heard, although this is not
7 documented, it's just from farmers talking to
8 me. That the material as it would be used in
9 the field is quite alkaline and so alkaline
10 that it would interfere unless buffered in
11 some way. And other alternatives would be
12 more desirable because they have less of a pH
13 effect on when they're used.

14 And could you comment on -- or is
15 it used in conjunction with materials to
16 acidify it or is the alkalinity not a problem
17 in your experience?

18 MR. DATNOFF: Well, okay, so the
19 pH, I mean it is high. I mean there are those
20 and when we conducted experiments, we will use
21 other pH materials like potassium hydroxide
22 when compared to potassium silicate for you

1 know, controlling a disease for an example.

2 And so we think in a foliar
3 application for disease suppression, it's
4 probably either the ion or the pH that is
5 having an effect against the pathogen. Okay,
6 so I don't see that as an issue.

7 If you use something like copper
8 you have to have consideration to using the
9 right equipment. And the same thing with
10 sulfur, to protect the person who is actually
11 using it, right? So I don't see that as an
12 issue, but I'm sure that the people from PQ
13 Corporation will address the buffering
14 capacity a little more.

15 You know, the one thing I didn't
16 get to talk about in great detail was that the
17 accumulation that I mentioned that in the past
18 it was considered that to be an accumulator
19 it's only in the foliage. But we're finding
20 that many plants accumulate only in the roots
21 and they don't really translocate up. We
22 don't understand really why.

1 But for an example, like tomatoes,
2 we've shown that they can accumulate silicon
3 in the roots at around three percent just like
4 a rice plant does in its leaf tissue. And
5 we're not sure why, but we've conducted some
6 studies to show well we can reduce certain
7 soilborne diseases by knowing that.

8 We may not be able to protect the
9 foliar part as well, but the root part seems
10 to be well protected. So you need these other
11 alternatives, something like potassium
12 silicate, to come in to manage other foliar
13 diseases.

14 CHAIR RICHARDSON: Great. Thank
15 you very much Dr. Datnoff.

16 The next speaker is Kelly Pepper
17 and he'll be followed by David Moore.

18 MR. PEPPER: Good morning. I am
19 Kelly Pepper, manager of Texas Organic Cotton
20 Marketing Cooperative located in Lubbock,
21 Texas. First of all I want to give a great
22 big Texas thank you to each Board member and

1 an extra measure to the four of you that are
2 going off.

3 Until I attended the last NOSB
4 Board meeting and learned more about the work
5 of the Board, I had no idea of the time
6 commitment involved in your service. Thank
7 you.

8 On to the reason I'm here.
9 Hydrogen chloride. Nasty stuff. I'm not
10 going to try to convince you otherwise.

11 But unfortunately I have to be
12 here asking you to renew its inclusion on the
13 National List because currently its use for
14 delinting cotton seed for planting is
15 absolutely essential to organic cotton
16 production in the United States. Let me
17 explain.

18 Our cooperative has approximately
19 35 active members located in the plains of
20 northwest Texas, who produce 80 to 90 percent
21 of the organic cotton grown in the U.S. In
22 2014 our members produced -- planted 19

1 thousand acres of organic cotton. In
2 contrast, there were 11 million acres of
3 non-organic cotton planted in the U.S., 96
4 percent of which were GMO.

5 Close to half of the U.S. acres
6 are in our northwest Texas area. So our
7 organic cotton acres are only about 0.3
8 percent of the cotton acres in our area and
9 0.17 percent of the cotton acres in the U.S.

10 The cotton industry laughingly
11 says if you round the numbers, organic cotton
12 is zero. Availability of planting seed is a
13 huge issue for our producers because we're so
14 small. No seed company will provide organic
15 seed and there's only a limited amount of
16 non-GMO seed available from which our farmers
17 can obtain non-treated seed.

18 None of the major seed/chemical
19 companies really sell non-GMO cotton seed.
20 There are only a couple of small seed
21 companies that will supply our growers with
22 untreated, non-GMO seed. And this seed is

1 delinted with hydrogen chloride as is all the
2 seed sold in our area.

3 The volume of seed required for
4 our organic production is not enough to cause
5 seed companies to do anything different just
6 for organic. If as was suggested yesterday,
7 hydrogen chloride should be de-listed to
8 provide a financial incentive to develop an
9 alternative, organic cotton production in the
10 U.S. would cease and most of the acres would
11 likely return to conventional production.

12 As was mentioned in our and
13 other's written comments as well as in
14 testimony here yesterday, there's a promising
15 mechanical delinting alternative to hydrogen
16 chloride under development by the USDA
17 Agricultural Research Service. We would
18 certainly encourage and appreciate anything
19 this Board and NOP can do to promote this
20 research and speed along development of
21 mechanical delinting.

22 However, to eliminate organic

1 cotton growers need for the exemption for the
2 use of hydrogen chloride, mechanical delinting
3 will have to be developed to the point of
4 adoption by the cotton planting seed industry.
5 Because as outlined above, the volume of seed
6 for organic production alone is not enough to
7 entice seed companies to change their method
8 of delinting.

9 Let me put the use of hydrogen
10 chloride for delinting cotton seed in
11 perspective environmentally. It takes only
12 about 0.07 pounds of hydrogen chloride to
13 delint enough cotton seed to plant an acre of
14 organic cotton.

15 However, if this same acre of land
16 were planted to GMO cotton, it would be
17 treated with six to eight pounds of active
18 ingredient of pesticides. That is 100 times
19 as much pesticides as hydrogen chloride.
20 Additionally, 100 to 500 pounds of chemical
21 fertilizer would be applied to this acre.

22 I'll be glad to answer any

1 questions if you have any.

2 CHAIR RICHARDSON: Thank you.
3 Questions? Jay?

4 MR. FELDMAN: Thank you. Thank
5 you so much for making the trip. And you
6 know, this presents a dilemma. We talked
7 about this problem and I think you framed it
8 really well for the Board.

9 My only concern is the change in
10 the sunset process. And not keeping the
11 pressure up on the industry. And I realize
12 it's outside your control, but the industry as
13 it grows to advance the mechanical practices.

14 What do you think will incentivize
15 the transition to the mechanical practices?

16 MR. PEPPER: Well I don't think
17 anybody in the cotton industry at large
18 probably is crazy about hydrogen chloride.
19 And so I think the seed companies are closely
20 watching the research.

21 And if it can be proven to be
22 effective. And I mean there's some issues to

1 be addressed. You know, historically
2 mechanical delinting has damaged germination.
3 And I think that's the problem with Kincer's
4 method that had been mentioned in some of the
5 information.

6 But if the issues can be
7 addressed, I look for the industry as a whole
8 to be very interested in adopting it. It's
9 just -- it's got to prove itself and get
10 there.

11 CHAIR RICHARDSON: Thank you very
12 much for your comments.

13 MR. PEPPER: Thank you.

14 CHAIR RICHARDSON: The next
15 speaker is David Moore and he'll be followed
16 by Lynn Coody.

17 MR. MOORE: Good morning
18 everybody. My name's David Moore. I'm a
19 California licensed agricultural pest control
20 advisor and qualified applicator and I work
21 for Neudorff.

22 I want to thank both the NOP and

1 the NOSB for their time and commitment. I'm
2 here to thank all of you all for your patience
3 as you consider ferric phosphate yet again.
4 I especially want to thank the crop
5 subcommittee's members for their diligence and
6 forbearance.

7 Sunset is rather a loaded subject
8 lately, so I particularly thank you for
9 allowing the recent review and votes to stand.
10 The recent review and votes affirm that ferric
11 phosphate meets the three primary criteria of
12 OFBA, compatibility and consistency,
13 essentiality and the absence of adverse
14 effects on human health and environment.

15 No new information to the contrary
16 has been presented. The 2012 subcommittee
17 board and Board votes speak for themselves at
18 5 to 3 and 12 to 3 respectively.

19 After hearing so many speakers
20 yesterday point out how difficult it is to get
21 growers and other stakeholders to become
22 involved, I'm gratified by the incredible

1 outpouring of support ferric phosphate
2 received during the public comment period.
3 For the record, that was two growers. But we
4 got almost -- we got seven in 2012.

5 I'll be even more gratified that
6 an organic grower has traveled from California
7 to be here today to voice that support in
8 person. I know that grower support is far
9 more important to you all than anything I can
10 say, so I'm going to shut up about ferric
11 phosphate and let a certified organic farmer
12 speak to this important material in the first
13 person.

14 Before I sit down though, I want
15 to encourage everybody in this room to take a
16 minute while you're here in Louisville this
17 week to thank, to shake hands with an FFA
18 student or a faculty advisor as I've been
19 doing this week. There are 70 some thousand
20 of these people -- young men and women here
21 this week demonstrating their commitment to
22 American agriculture.

1 And if I may restate the obvious,
2 they are the future of farming and they should
3 have our support and encouragement. Thank you
4 for your support of ferric phosphate and
5 organic agriculture.

6 And Mr. Secretary Stone, I have a
7 label for you for an organic Hawaiian ant
8 product. Thank you.

9 CHAIR RICHARDSON: Thank you.
10 Questions? Jay?

11 MR. FELDMAN: Thanks for coming to
12 the meeting, I appreciate it. I'd like to
13 talk to you a little bit about EDTA and that
14 ingredient in ferric phosphate.

15 Are you -- can I ask you questions
16 about that?

17 MR. MOORE: Absolutely.

18 MR. FELDMAN: Okay, perfect.
19 Obviously, as a Board we're concerned about
20 both the active and inert ingredients in
21 materials and the Board several years ago
22 proposed and recommended a process of

1 reviewing inert ingredients. EDTA is on that
2 list of inert ingredients.

3 And we are -- you know, there will
4 be some process at some point down the road
5 hopefully. My question is whether you all
6 have explored other ingredients, inert
7 ingredients? Whether you're working with
8 design for the environment in EPA?

9 Are aware of that program and
10 efforts to remove the more highly toxic inert
11 ingredients to find more innocuous materials
12 that serve the same purpose? Whether you
13 internally as a company are looking at that?

14 Or, and this is just a three-part
15 question, or do you not view EDTA as an inert
16 ingredient and that the efficacy of the
17 product is diminished or it goes away if that
18 particular ingredient is not in there, given
19 your patent, which seems to imply, the patent
20 on the product seems to imply that the EDTA as
21 you're using it has active properties, active
22 ingredient properties under EPA's definition

1 of a registered pesticide?

2 MR. MOORE: Let me see if I can
3 keep all three parts straight.

4 MR. FELDMAN: Okay, thank you.

5 MR. MOORE: Yes, we're very much
6 aware of the review process. And as you
7 probably know, we have in fact petitioned for
8 a different chelator. That petition is in
9 abeyance right now. We're eagerly awaiting
10 the process.

11 And we indeed from the very
12 beginning have examined the issues of other
13 alternative inert ingredients. We're a very
14 forward looking company.

15 We're very committed to our role
16 as a provider of reduced risk and organic
17 products. And we will move forward with
18 making ferric phosphate available as an
19 effective tool for the organic grower with any
20 coming changes in the inert list.

21 And for the record, I just want to
22 point out for anybody who may not know this,

1 EDTA is currently an allowed List 4
2 ingredient.

3 CHAIR RICHARDSON: Other
4 questions?

5 MR. MOORE: Thank you.

6 CHAIR RICHARDSON: Thank you.
7 Next speaker is Lynn Coody and she'll be
8 followed by Will.

9 MS. COODY: Good morning. My name
10 is Lynn Coody and I'm presenting today for the
11 Organic Produce Wholesalers Coalition which we
12 call the OPWC.

13 The OPWC is comprised of ten
14 businesses that distribute fresh organic
15 produce to customers located across the United
16 States and internationally. Our combined
17 annual sales in 2013 exceeded \$625 million.

18 I have a few different topics to
19 speak on today. The first topic is assessment
20 of soil building practices.

21 OPWC sees soil conservation as a
22 cornerstone of organic farming. In our

1 experience there is a wide range in the
2 practices used to manage soil health on
3 certified organic farms.

4 And we think that a clarification
5 of the interpretation and application of these
6 standards would be particularly helpful within
7 the produce market. Therefore, we welcome
8 discussion of implementation of the NOP
9 standards that maintain and improve soil
10 quality.

11 OPWC does not favor the approach
12 of relying on quantitative soil assessment
13 tools in the certification process. We note
14 that certification standards are generally
15 framed with qualitative practice space
16 language making them applicable to a wide
17 range of conditions for growing a wide range
18 of crops.

19 In our opinion, quantitative
20 assessment of soil conservation such as NRCS
21 tools may be useful in providing secondary
22 documentation of an erosion problem such as

1 if a noncompliance on this specific topic is
2 difficult to resolve between a certifier and
3 a grower. Instead of a metric-based approach,
4 we suggest that a focus on training and
5 education of certification personnel is more
6 in line with the NOP's efforts to reach a
7 sound and sensible balance when implementing
8 soil quality standards.

9 Topic two, peracetic acid. OPWC
10 supports relisting peracetic acid accompanying
11 by its current annotation. Our members are
12 particularly interested in materials that help
13 ensure food safety because we handle many
14 products that are consumed uncooked.

15 Peracetic acid has two distinct
16 uses in organic produce handling as a post
17 harvest handling material that may be used in
18 wash water without subsequent rinse. And as
19 a sanitizer on food contact surfaces. We
20 consider both these uses for peracetic acid to
21 be essential to our sector as we have very few
22 sanitizers that may be used on organic

1 produce.

2 Peracetic acid is in current use
3 within the produce sector. For example, this
4 material is considered a preferred option for
5 washing apples after they are harvested. For
6 many produce commodities, it is the
7 disinfectant of choice.

8 Topic Three, protecting against
9 contamination in farm inputs. OPWC supports
10 the goal of this discussion document to
11 protect against contamination of organic farms
12 by inputs that may contain materials that are
13 prohibited under NOP standards.

14 That said, we caution the
15 subcommittee against making recommendations
16 that impose requirements on crop producers
17 that as a lever for fixing problems that
18 originate in conventional agricultural,
19 industrial or societal systems. In our
20 opinion, such actions would place undue
21 burdens on the very growers who are already
22 implementing many practices that support

1 environmental, ecological and human health.

2 In an effort to move the
3 discussion forward in a practical direction,
4 we have three suggestions. Focusing
5 subcommittee discussions with experts on
6 solutions that are practical for
7 implementation by organic farming operations.
8 And that are verifiable through normal means,
9 accessible to organic inspectors and
10 certifying agents.

11 Emphasizing agricultural practices
12 as the primary focus for mitigating
13 contamination. And identifying specific
14 research topics related to mitigation of
15 chemical contaminants, especially through the
16 composting process.

17 OPWC appreciates the efforts of
18 both the NOSB and the NOP to clarify the
19 implementation of organic standards. We give
20 thanks for the work of the members that are
21 leaving the Board. And thank you very much
22 for the opportunity to comment.

1 CHAIR RICHARDSON: Thank you Lynn.

2 Questions? Thank you very much.

3 MS. COODY: Okay.

4 CHAIR RICHARDSON: The next
5 speaker is Will Fantle and he'll be followed
6 by Robert Larose.

7 MR. FANTLE: My name is Will
8 Fantle. I'm the Co-Founder/Co-Director of the
9 Cornucopia Institute. I'm from Wisconsin.

10 I want to thank the Board members
11 that are departing for their service. I know
12 the workload is probably more than you
13 anticipated. We appreciate your service to
14 the organic community.

15 There was some good news announced
16 at the beginning of this meeting and I want to
17 acknowledge that. That good news includes the
18 new Chair, a validated Chair of the NOSB. And
19 we think that's a positive step forward
20 acknowledging that it is the NOSB that chairs
21 these meetings. So kudos Madam Chair.

22 The policy and procedures

1 subcommittee being reactivated after its
2 untimely demise earlier this year. We think
3 that is another positive step going forward.

4 The critical task that they're
5 being given to develop a process for
6 annotations is very important. It's going to
7 be important to you as you consider materials
8 for renewal, reuse, new materials.

9 These materials may need some type
10 of annotation to be approved for continued use
11 in organics. An annotation that focuses and
12 limits their specific uses.

13 Okay. Let's talk about some other
14 issues. Sunset. You've heard a lot about it.
15 I'm going to harken to an event that happened
16 earlier this morning. At 8:05 a.m. in
17 Louisville.

18 Sunrise. If you go outside and
19 look around, that transition that occurred at
20 sunrise, it's no longer dark out. We
21 understand what the meaning of those concepts
22 are. And I think that Amy Simpson provided a

1 very clear and detailed presentation to you
2 regarding sunset, the legalities, what the law
3 means, what the law doesn't mean.

4 And I think it's incumbent upon
5 you as a Board to keep pushing the program to
6 revise the changes that were, we believe,
7 wrongly implemented in September 2013. And as
8 you do that, and I encourage the program as
9 well as they potentially revisit this, think
10 long and hard about this.

11 There are organizations like ours
12 that are working on legal remedies. And
13 looking at taking action on those. The TR's
14 that are going to be required for the 2017
15 materials, you have a daunting list in front
16 of you.

17 All that immense number of
18 materials to examine and look at. You need
19 good TR's. We're not convinced as an
20 organization, which we outlined in our report,
21 the Organic Watergate, that some of the
22 initial TR's and tap reviews that were done,

1 were adequate, sufficient and not biased.

2 Please make an effort to get good TR's as you
3 weigh the need for those materials.

4 Enforcement. Miles says it's
5 working. Sometimes it's not. And I'm going
6 to again reference something I've talked about
7 before here, the Shamrock Organic Factory
8 Dairy in Arizona.

9 We filed a complaint in October
10 2008 on this operation. By 2011, October
11 2011, the USDA finally acknowledged the merit
12 of that complaint and moved to initiate
13 enforcement activities against that operation.

14 Three years later, we're 2014,
15 this operation is still in business because
16 they appealed it. So six years after we filed
17 our complaint based on evidence we gathered
18 from our direct visits to that operation,
19 they're still producing what's called
20 certified organic milk.

21 That is not an example of
22 something that is working. Origin of

1 livestock, an issue that is important to the
2 dairy and beef community.

3 In April 2010, we were told by the
4 program director that it's a priority for the
5 agency. We still wait. Years have gone by.
6 And now we're told next year.

7 CHAIR RICHARDSON: Thank you Will.
8 Questions, comments? Great, thank you.

9 The next speaker is Robert Larose
10 and he'll be followed by Terry Gong.

11 MR. LAROSE: Good morning. My
12 name's Rob Larose. I'm the President of
13 BioSafe Systems and I'm here to support two of
14 our products, peracetic acid and sodium
15 peroxy carbonate, which is essentially, we call
16 it sodium percarbonate.

17 The sodium percarbonate product,
18 under our trade name Green Clean Pro, is used
19 as an algicide, bactericide and fungicide. It
20 has been very well received in the organic
21 community and the conventional grower
22 community.

1 I should point out that BioSafe
2 Systems is a bit of a different company in the
3 sense that 95 percent of our products are
4 organics or listed products. 90 percent of
5 our customers though are conventional growers.

6 So generally what that means is we
7 don't take on a product and develop a product
8 unless it actually works. And it will stand
9 up in both industries.

10 You know, there's sodium
11 percarbonate was listed and developed as an
12 alternative to copper sulfate. And it has
13 shown very good efficacy in the field.

14 Primarily we sell a lot of
15 material into the rice industry up in
16 Sacramento where they are concerned about
17 bioaccumulation of copper sulfate and
18 resistance issues. And so the industry at
19 large supports it.

20 Peroxyacetic acid, we were one of
21 the first companies to introduce it into
22 agriculture and horticulture. Very broad

1 applications across the board either as a
2 foliar treatment or as a hard surface
3 sanitizer or a water treatment.

4 Peroxyacetic acid is essentially
5 hydrogen peroxide coupled with acetic acid.
6 Both of these products have zero waste when
7 they're manufactured. They're -- peroxyacetic
8 acid is also NSF listed and kosher certified.

9 So we -- many -- or both of these
10 products have become standards in many of the
11 organic farming operations. And what's coming
12 into the picture quickly is the Food Safety
13 Modernization Act. Both of these products are
14 going to be key players in solving food safety
15 issues.

16 Many growers right now are using
17 our Green Clean Pro Product to treat for algae
18 in their containment ponds for irrigation.
19 And helping them meet the discharge
20 limitations.

21 And interestingly enough, we just
22 completed many trials that shows that there's

1 also reduction in pathogens in the water. So
2 as these new regulations kick into gear, it's
3 going to be very important for food safety for
4 both water treatment and also as a sanitizer.

5 Another interesting point on
6 peroxyacetic acid, on the conventional side,
7 we're making applications prior to harvest to
8 further reduce the potential for food -- human
9 pathogens on the produce. And that has proven
10 very, very effective.

11 So you know, it takes a while to
12 develop these methods, products and
13 applications. And this sunset process is a
14 little challenging for us because it takes at
15 least five years to be able to get the data
16 and develop it and get it out into the hands
17 of people to show the benefits and more
18 importantly, how to get the most out of the
19 product when they're using it.

20 So you know, that's why I'm here.

21 CHAIR RICHARDSON: Thank you.

22 MR. LAROSE: Any questions?

1 CHAIR RICHARDSON: Does he get a
2 price for starting one second -- or stopping
3 one second before?

4 MR. LAROSE: I have an iPad that's
5 got a counter on here, so it works extremely
6 well.

7 CHAIR RICHARDSON: All right, Zea?

8 MS. SONNABEND: Thank you for
9 coming today. Regarding the sodium carbonate
10 peroxyhydrate, in the comments you submitted
11 for our last meeting, San Antonio, Texas, you
12 made a statement that -- and because I pulled
13 it up in front of me here. It says in 2014
14 copper labels have been restricted to a label
15 that is rendered useless when treating algae.

16 I asked a couple of organic rice
17 growers and I tried to look online for the
18 documentation behind this statement. And can
19 you just explain in what way they've been
20 restricted and why it's useless?

21 MR. LAROSE: Well, what they're --
22 what that letter was speaking to is that

1 copper sulfate, because the California DPR is
2 concerned about bioaccumulation, they
3 restricted the amount of poundage that can be
4 used during the course of the season. To the
5 point where if you have a bad algae season,
6 you can't get enough product out there to
7 actually do the work.

8 Where on our product, there is no
9 restrictions.

10 MS. SONNABEND: Do you know what
11 they restricted it to? What poundage?

12 MR. LAROSE: I don't. I don't
13 have that number in front of me, but I do --

14 MS. SONNABEND: Okay. Because the
15 rice growers didn't seem to know about it.

16 MR. LAROSE: I can get that to the
17 Committee very easily.

18 CHAIR RICHARDSON: Other
19 questions? Thank you very much.

20 MR. LAROSE: Thank you.

21 CHAIR RICHARDSON: Next speaker is
22 Terry Gong and he'll be followed by Gerald

1 Davis.

2 MR. GONG: Hi, my name's Terry
3 Gong. And I am a managing partner in Harvest
4 Systems International and Earth Renaissance
5 Technologies.

6 In addition to my original
7 petition for sulfurous acid, subsequent
8 comments and oral remarks I made during the
9 NOSB meeting held in San Antonio, Texas, I'm
10 here to advocate continuing to keep sulfurous
11 acid on the approved materials list, address
12 some of the issues raised by those wanting to
13 have it removed and to answer any possible
14 questions the NOSB may have.

15 First, in response to the claim
16 that sulfurous acid should be removed as a
17 synthetic sulfate fertilizer, the primary use
18 of sulfurous acid is to restore the acidifying
19 component back to irrigation water by
20 providing a delayed release of acidity in the
21 form of bisulfite so it can be carried and
22 delivered to amend and control the pH of the

1 soil-water solution that's ideal for the crop
2 being grown.

3 The actual transformation of
4 bisulfite into sulfate is the result of a
5 microbial process performed by chemotrophic
6 bacteria, a precursor bacterial group that
7 obtain their energy directly from inorganic
8 electron-donating compounds that cause the
9 hydrogen proton to release and the formation
10 of sulfate to occur.

11 Number two. In response to the
12 claim that the use of sulfurous acid would
13 harm and degrade soil microbial populations,
14 while it is true that bisulfite chemically
15 acts as an oxygen reducer scavenger which can
16 be biocidal, this property is very limited and
17 does not kill all soil microbes. A closer
18 more detailed examination of this material
19 indicates that its use would actually result
20 in increasing the overall population density
21 and complexity of soil organisms that make up
22 the entire soil food web.

1 This is because once the
2 chemotrophic bacteria utilize it, the hydrogen
3 proton releases in the sulfite has been
4 converted to sulfate. The biosoluble property
5 no longer exists. The sulfur becomes a
6 nutrient for soil microbes and plants.

7 The soil minerals dissolve and
8 become soluble nutrients as a result of the
9 release of acidity. Additional pore space is
10 created, reopened, maintained and water
11 penetrates deeper, salts leach away from the
12 root zone and the pH of the soil lowers.

13 Oxygen and carbon dioxide
14 penetrates and exchanges deeper into the soil.
15 And under these conditions, the population
16 density and activity of the soil microbes
17 flourish, resulting in a net increase in
18 fertility and ability for the soil to
19 sequester more carbon in the organic form as
20 food and fiber.

21 In response, and I want to thank
22 the person who spoke earlier for making these

1 points because I view those comments as a
2 constructive criticism because we all want to
3 be better. Okay. In response to the claims
4 of human health, first, the material itself,
5 sulfurous acid, when you drink wine, you're
6 drinking a more concentrated form of sulfurous
7 acid. So as far as human health goes, if you
8 don't -- if you drink too much of it, then you
9 have a problem.

10 Okay. Worker safety operations.
11 Our equipment has been in use for nearly 60
12 years. And our company provides operational
13 information and training seminars to our
14 customers. And we'll always continue to seek
15 ways to improve the safe and proper operation
16 of our equipment and the production of the
17 sulfurous acid whenever we can.

18 Regarding emissions. While our
19 company invented and pioneered the onsite
20 generation of SO₂ sulfurous acid to amend
21 irrigation water, there are other versions of
22 this equipment.

1 I was almost finished. But --

2 CHAIR RICHARDSON: Do you want to
3 finish your last sentence or whatever it is?

4 MR. GONG: Well, okay. I was
5 going to say that our equipment has been
6 tested to only release .11 of a pound in a 24
7 hour period of time which is well below the
8 current EPA air quality regulatory standards
9 which allows two pounds of fugitive material
10 to be released in a 24 hour period of time.

11 That answers one of the reasons
12 why there hasn't been much information
13 regarding air quality emissions. Because
14 we're so effective in scrubbing the SO2.

15 CHAIR RICHARDSON: Thank you.
16 Questions? No. Thank you very much.

17 MR. GONG: Thank you.

18 CHAIR RICHARDSON: The next
19 speaker is Gerald Davis and he'll be followed
20 by Brian Neufeld.

21 MR. DAVIS: My name is Gerald
22 Davis. I represent Grimmway Farms, Cal

1 Organic in California. Former NOSB Board
2 member and crop subcommittee chair for a
3 couple of years back in 2005 to 2010.

4 Most people know us growing a lot
5 of carrots. We grow potatoes, tomatoes,
6 onions, lots of veg crops like broccoli,
7 spinach, radishes, lettuce and 30 other
8 different vegetable crops.

9 I wanted to bring up my testimony
10 written and oral from the last spring meeting
11 about sulfurous acid. Again, pointing out
12 that we use this as a water treatment process.

13 We need to neutralize the
14 bicarbonate in the water. The levels that we
15 have in the West in our farm is not unusual.
16 It's a broad problem of 150 to 350 parts per
17 million of bicarbonate in our irrigation water
18 that is coming from groundwater sources.

19 It's just the way it is in the
20 West. And when that bicarbonate is watered
21 onto the fields, it becomes limestone and
22 perpetual 300 to 500 pound per acre per crop

1 applications of limestone are very harmful to
2 crops eventually.

3 So we have to neutralize it
4 someway. And that's what I'm here to talk
5 about is the sulfurous acid produced by the
6 sulfur burners has worked very well for us.

7 Before we were able to use them,
8 we used elemental sulfur, which was not very
9 effective. It led to very highly elevated
10 sulfate levels in the soil which were not
11 particularly harmful, but not good. And it
12 didn't really lower the pH. This material is
13 not designed to lower pH directly in the soil.
14 It just keeps you from adding more and more
15 limestone when you don't need it. That's the
16 point I wanted to make.

17 We also grow lots of cover crops,
18 that's sesbania, incorporation of vetch to
19 give organic matter to help in the -- which is
20 a material mentioned in your material about
21 helping acidify soils. We do that.

22 Artichoke flower, it has nothing

1 to do with this, but I thought it looked good.
2 Really, the bottom line is this is not
3 unsustainable. This is not Grimmway's venture
4 into aquiculture. These are spreading basins
5 for our local water district that recharges
6 groundwater.

7 This year and last year they were
8 completely dry. We're in a drought. There's
9 an aerial view of one of them. There's 1350
10 acres total in our district where they, in
11 surplus water years, they recharge our
12 groundwater. So we do not deplete it.

13 There's a higher aerial view of
14 the same thing. There are some of our ranches
15 in the black areas that are right around that
16 water district recharge. Broader view of
17 California.

18 Here's the point. These are
19 sustainable practices of pumping groundwater.
20 This shows what the district has done to
21 maintain the groundwater level since they
22 started recharge in the mid 60's.

1 You can see that by the top line
2 it has stayed static. And pretty much, and
3 that's -- the blue lines are years of surplus
4 water where they are adding water and the red
5 lines are when they're taken out.

6 Quick mention on sulfur. When the
7 NOSB looked at this the first time, we
8 consulted this thing on sulfur. We learned
9 that sulfur is no longer a natural material.
10 And since 19 -- since 2000 when this mine went
11 out of business, that was the end of domestic
12 natural sulfur production by the Frasch
13 process.

14 And I'd love to answer any more
15 questions about that because sulfur as
16 mentioned in your top as a natural
17 alternative, is not natural. It is synthetic.
18 Any questions?

19 CHAIR RICHARDSON: Questions?
20 Harold?

21 MR. AUSTIN: Thank you. Earlier
22 today during the public comment, there was

1 mention of the possibility of just simply
2 using more water to flood the ground, to flush
3 the bicarbonates and the salt physically out
4 of the soil profile so that this -- the
5 sulfurous acid or the sulfur burners wouldn't
6 have to be used.

7 How practical of an approach is
8 that?

9 MR. DAVIS: Excess ground --
10 excess irrigation to leach salts is practiced
11 and we do it all the time. It does not leach
12 away the excess limestone that you add with
13 this water.

14 So it is a related issue. But --
15 and the sulfur burners do help with that. But
16 the main thing is we cannot keep adding more
17 and more limestone to our already alkaline
18 soils. It eventually forces you to do
19 something about it over and beyond what you
20 can just do with compost or elemental sulfur.

21 CHAIR RICHARDSON: Follow up?

22 MR. AUSTIN: I'll follow up with

1 that. So the actual practical usage of the
2 sulfur burners, the sulfurous acid is really
3 to take and remove the bicarbonate out of the
4 water to help treat the water and then the
5 soil. And it's removing that contaminate
6 before it ever reaches the soil, is that
7 correct?

8 MR. DAVIS: That's the overall
9 approach. That's the most important part of
10 the usage. It's not acidifying soils
11 directly, it's just eliminating that continual
12 addition of limestone which is deleterious in
13 our soil conditions.

14 CHAIR RICHARDSON: Jay?

15 MR. FELDMAN: Thank you. And
16 thank you, Gerald, for your service on the
17 NOSB. I have a question for you, Gerald. One
18 more question, sorry.

19 Thank you for your service on the
20 NOSB.

21 MR. DAVIS: Yes, you're welcome.

22 MR. FELDMAN: I have a -- just ask

1 you to switch gears since you're up there
2 already. I wanted to ask you about sodium
3 nitrate and what the status of that is as you
4 understand it right now, and whether it's
5 being used, and if there's any change in the
6 rate of application and so forth.

7 MR. DAVIS: Well that's kind of an
8 evolving, interesting subject. When sodium
9 nitrate was voted off of the -- well, put on
10 a prohibited natural status a few years ago,
11 our company ceased using it.

12 And for two to three years we
13 studied the effects of not being able to use
14 it. In some cases the crops did better.
15 Certain crops do fine and actually do pretty
16 good without it. Others we noticed
17 significant drops in production and quality.

18 It was pointed out to us earlier
19 this year that people are still using this
20 material because it was never dropped from the
21 list. And we started asking questions on when
22 will that be dealt with? And well no one

1 seems to know. For now it's not. So we were
2 actually considering using it again for the
3 time being until a resolution is reached.

4 MR. FELDMAN: Thanks.

5 CHAIR RICHARDSON: Thank you.

6 Next -- the next speaker is Brian Neufeld and
7 he'll be followed by Paul Baker. And we're
8 running about 30 minutes behind just as a sort
9 of a time check for you.

10 MR. NEUFELD: Good morning. My
11 name is Brian Neufeld. I'm an organic farmer
12 in California, San Joaquin Valley, primarily.
13 And we grow citrus, blueberries and table
14 grapes organically.

15 I'm here to talk about sulfur
16 burners as well. And my goal is to continue
17 the allowance of the use of sulfur burners in
18 organic production.

19 And there's a quote that, I came
20 across an email a few years ago that I thought
21 was interesting. And I don't know who came up
22 with the quote, but it says whatever our

1 accomplishments, our sophistication or
2 artistic pretension, we owe our very existence
3 to a six-inch layer of top soil and the fact
4 it rains.

5 And the fact that it rains is
6 becoming a more and more of a difficulty in
7 California. So we need to focus on our soil
8 and the water that we do have.

9 The use of sulfur burners for ag
10 production, I feel has enhanced the richness
11 and the fertility of the soil since our
12 allowance of use. Particularly over the last
13 four years, we've been implementing this
14 strategy.

15 And I have three reasons why I
16 think we should continue the use. First is
17 soil health. As it was mentioned earlier, a
18 healthy soil leads to a healthy plant. And
19 healthy plant leads to good production. And
20 we're all about healthy plants.

21 Good soil health consists of
22 quality organic matter at optimum pH levels.

1 Ideal growing soil pH range from five and a
2 half to seven depending on the crop that
3 you're growing.

4 And this is proofed by the regular
5 soil analysis that we have done biannually to
6 check that. Applying high pH water to the
7 soil diminishes our soil fertility.

8 The second point is it's an
9 economic water quality issue. This is the
10 most economic and efficient method of lowering
11 our water pH, is by injecting the material
12 from the sulfurous acid.

13 The drought conditions in
14 California have magnified the need to treat
15 water as our diminishing aquifers and water --
16 surface water supplies have an increasing pH
17 level with high bicarbonates and concentrated
18 toxic metals.

19 Continual acidified water is
20 necessary to combat the effects of these
21 toxicities. We have invested within our
22 organization over \$300,000 worth of capital

1 into the equipment to perform this over the
2 last four years.

3 As far as safety, sulfurous acid
4 is a safe material to handle. I have
5 personally cleaned out some tanks that had
6 sulfurous acid in it, and not even as much as
7 a skin irritation has happened.

8 My third point, improving water
9 quality by adding heat to the natural sulfur.
10 Sulfur is an element that is allowed for use.
11 The only difference with this is it comes in
12 a pelletized form. It gets heated and it is
13 more efficiently utilized than a soil sulfur
14 spread.

15 And you really do not use a whole
16 lot of this material either, depending on the
17 size of the operation. You could use as much
18 as half a pellet's worth of material
19 throughout an entire growing season as it's a
20 slow burning material. And the emissions are
21 very low as you can hardly notice any
22 emissions coming out of the top of this smoke

1 stack.

2 So just to summarize, use of
3 sulfur burners for organic production I feel
4 improves our soil health. Economically
5 improves our water quality. And that's all.

6 CHAIR RICHARDSON: Thank you very
7 much. Questions? Great. Thank you.

8 Paul, you're up next and after
9 that is Gisela Wittenborn.

10 MR. BAKER: Good morning. Thanks,
11 I'm Paul Baker. I represent Sweetwater. Oh
12 great. Yes, red button?

13 My name is Paul Baker, thanks for
14 the opportunity to speak. I represent
15 Sweetwater. I speak on behalf of thousands of
16 acres of organic farmers in arid regions who
17 would be devastated by the removal of
18 sulfurous acid.

19 Today I will emphasize the scale
20 of the problem sulfurous addresses. Why
21 alternatives are not sufficient. And human
22 health concerns surrounding sulfurous.

1 Sulfurous is used on a wide
2 variety of cash and row crops. Contrary to
3 the popular notion that it's only for large
4 farms, more than 70 percent of our clients are
5 smaller than 50 acres.

6 Many farmers have invested large
7 capital and infrastructure and they would not
8 be able to justify that without results. Over
9 60 percent of the planet's soil is alkaline.
10 The central issue for farmers in these regions
11 is how salt affects their ability to farm.
12 Irrigation water adds thousands of salts per
13 acre per year, every year on top of already
14 alkaline conditions.

15 There is a notion that sulfurous
16 decreases aeration. Alkali water decreases
17 aeration. Sulfurous is the cure to that,
18 increasing porosity by leaching those salts
19 out.

20 Is sulfurous safe? Yes. It is
21 safe to handle and produce. I've brought a
22 sample of sulfurous and a sample of water.

1 Can you tell the difference? I cannot.

2 Sulfurous is safe to handle and to produce.

3 We agree that sulfurous generation
4 must be produced safely and prepare and
5 advocate for that safe use through risk
6 assessments, warning labels, onsite training,
7 manuals and more, which we would be happy to
8 provide. We have had zero reported incidences
9 with this equipment in our company's history
10 over tens of thousands of acres of usage.

11 There are several alternatives to
12 sulfurous, but none are impactful enough to
13 handle salt in the volume that it comes down.
14 I want you to turn your attention to these
15 pictures here.

16 These pictures show organic
17 cucumbers using citric acid and organic
18 cucumbers using sulfurous acid just three
19 weeks later. Cost about \$3,000 a week with
20 citric. And you can see the yellowing on the
21 ends of leaves indicating lower health. Cost
22 with sulfurous about \$200.

1 Another alternative for sulfurous
2 is elemental sulfur, which folks that use it,
3 simply do not see results. Most of them will
4 use it in conjunction with sulfurous acid.

5 The environmental impact of
6 sulfurous acid, all of the organic production
7 combined with sulfur burners today, would
8 equate about 30 seconds of naturally occurring
9 sulfur dioxide emissions from volcanic
10 activity. Salt represents a threat to
11 sustainable agriculture on over a majority of
12 the world's soils.

13 Small organic farmers who have
14 invested in this infrastructure would be
15 restricted to make a choice of leaving organic
16 altogether if this were eliminated. So we
17 urge strongly from behalf of my colleagues and
18 friends in this industry, please continue to
19 support sulfurous acid as it is the tool that
20 we can possibly use to fight off this massive
21 problem.

22 And thanks for your time. Any

1 questions?

2 CHAIR RICHARDSON: Questions?

3 MR. BAKER: Yes, there.

4 MS. SONNABEND: You mentioned
5 about the scale of the operations that -- a
6 variety of scales of operations that this is
7 appropriate for. And I imagine when a grower
8 approaches you about getting this equipment,
9 they would like to see a cost-benefit analysis
10 of their purchase.

11 So I'm wondering what you think
12 the smallest scale that this would be a
13 realistic benefit to install would be? What
14 would be the smallest scale grower that might
15 consider this?

16 MR. BAKER: Right. I was talking
17 to a farmer just last night about how they
18 could use this on two acres or less. And that
19 would be very difficult for us to retail
20 equipment and put infrastructure onsite.
21 That's impractical.

22 What would be practical is one

1 unit servicing an area. Delivering --
2 bringing equipment to the site, producing the
3 required product and having a day, a week or
4 a monthly tank supplying the product.

5 So it can be actually used for
6 very small applications if you have enough
7 growers in an area. But most of our farmers
8 like I said, are 50 acres or less.

9 CHAIR RICHARDSON: Any other
10 questions? Thank you very much.

11 MR. BAKER: Thank you.

12 CHAIR RICHARDSON: Next speaker is
13 Gisela Wittenborn and she'll be followed by
14 Richard Bennett.

15 MS. WITTENBORN: Good morning, I'm
16 Gisela Wittenborn. I'm here to comment on
17 sulfurous acid and ferric phosphate. I am
18 working as an agronomist PCA for a third
19 generation family farm growing table grapes in
20 California's southern central valley.

21 The hot semiarid climate and long
22 sunny days are ideal for growing quality table

1 grapes. However, the farming system does rely
2 on irrigation and high bicarbonate levels in
3 the irrigation water can be very challenging.

4 Especially during the current
5 drought, some vineyards depend heavily on
6 water with excessive bicarbonates and a pH of
7 eight or higher, which is really very high.
8 This is a problem that people who are working
9 in more humid regions might not be familiar
10 with.

11 Irrigation water with excessive
12 bicarbonate concentration and a high pH
13 precipitates calcium as a plant-available
14 calcium carbonate, the limestone, while sodium
15 cations take their place in the clay
16 particles. This leads to the dispersal of
17 clay particles and the collapse of good porous
18 soil aggregate structure, turning the soil
19 into concrete, impeding water infiltration,
20 aeration and nutrient uptake.

21 Sulfurous acid gained from sulfur
22 burning and mixed into the irrigation water

1 amends the situation and complies with the
2 criteria for organic production. The burning
3 of elemental sulfur is an environmentally
4 benign, safe and effective procedure.

5 We use this technique where the
6 water analysis demands it and only use a
7 quantity that is prescribed to correct the
8 excessive pH and/or bicarbonate problem, and
9 ensure that the soil fauna is not impacted.

10 We understand the need for a
11 healthy soil fauna and are going at great
12 lengths to maintain it by regular broadcast
13 compost application and planting cover crops.
14 Moreover, we use sulfurous acid to neutralize
15 the pH of irrigation water. We do not use it
16 as a fertilization.

17 Finally, conditions that require
18 sulfurous acid are not caused by unsustainable
19 irrigation practices. Rather sulfurous acid
20 is necessary to adjust naturally occurring
21 alkaline soils and poor water quality.

22 Suggested alternatives like

1 seaweed, humic acid, soil sulfur, they are
2 just not practical as my other guys before me
3 already explained at great length. And as to
4 ferric phosphate, crops differ in their
5 propensity for growing slugs and snails.

6 In our area, citrus is usually the
7 main breeding ground for them. Therefore,
8 vineyards, watering citrus can have severe
9 snail outbreaks in some years.

10 These events are not very
11 frequent, but when they occur, effective snail
12 control is necessary to prevent vine
13 defoliation and crop contamination. In these
14 situations we rely on continued use of ferric
15 phosphate-based slug and snail baits as the
16 least environmentally harmful and most
17 effective means of managing crop pests.

18 Ferric phosphate occurs in the
19 natural environment. As to the issue of
20 inerts, all pest control products are
21 formulated with inerts to increase efficacy.
22 To comply with the organic rules, pest control

1 materials have to be formulated using only
2 safe materials, EPA List 4 and EDTA is falling
3 into that.

4 And on top of that, we have not
5 observed any damage to our earthworm
6 population as a consequence of slug
7 applications. Moreover, there is really no
8 alternative -- viable alternative to that.

9 Basically in essence, both
10 materials are minor as to the extent that they
11 are being used by us. But they are major that
12 in the case they are needed, we cannot do
13 without them. Thank you.

14 CHAIR RICHARDSON: Oh, very good.
15 I think -- I think you're on the list now.
16 Okay, questions for Gisela, any? No. Okay,
17 thank you, though.

18 MS. WITTENBORN: Thank you.

19 CHAIR RICHARDSON: The next
20 speaker is Richard Bennett and he'll be
21 followed by Neil Miller.

22 MR. BENNETT: Good morning. Thank

1 you for allowing me to speak with you today.

2 I just represent the family farm. My wife and
3 I have blueberries and late season navels.

4 But you have to understand the
5 California situation. California has four
6 percent of the nation's farmland, but we
7 produce over 50 percent of all the fruit,
8 vegetables and nuts.

9 We have water problems. A lot of
10 legislation lately. And that's much more than
11 a four minute discussion. But we have soils
12 that range from 7.2 to 7.8, water coming in is
13 7.5 to 9.5. Extreme situations here.

14 We go to -- actually again,
15 extreme situation to try to control it. We
16 map all of our soils, we irrigate exactly to
17 that soil. We own an 80 acre block. I have
18 four different soil types.

19 The EC, they're measured every 18
20 inches when we go in and put in the soil, or
21 put in the plants. We use lysimeters to know
22 at the root zone what's in the rhizosphere,

1 what's available to the plant and below the
2 root zone.

3 So we know if there's any
4 leaching, any nutrients going past it. We
5 have to do that in California just to be
6 competitive. If an alternative source is, if
7 we ever had to go back to being conventional,
8 because without a sulfur burner, we would have
9 to.

10 You would be looking at
11 blueberries in this time period coming from
12 central Mexico, Chile and China is quickly
13 approaching. So you really have a problem
14 here that we need to address and keep the
15 sulfur burners.

16 The safety issues. I have
17 conventional farmers next to me that sulfuric
18 acid, you would not dare have it on your
19 hands, but coming out of the sulfur burner,
20 you can have it on your clothes, you can wash
21 it on your hands, it's not a factor.

22 Love to have any questions you

1 might have.

2 CHAIR RICHARDSON: Quick.

3 MR. BENNETT: Please.

4 CHAIR RICHARDSON: Questions?

5 Jay?

6 MR. FELDMAN: Thank you for coming
7 to the meeting. So do I understand correctly,
8 that you were a conventional farmer before
9 this, the use of sulfurous acid, or you made
10 the conversion? How did the two issues
11 coincide?

12 MR. BENNETT: About eight years
13 ago, I converted part of my acreage to
14 organics. My blueberries which require a 5 to
15 5.4 pH, have been organic the whole time. The
16 citrus I'm -- got part of it organic and part
17 of it is conventional.

18 It goes back to soil types and
19 what I can do.

20 MR. FELDMAN: And what did you do
21 on your blueberries before the allowance of
22 sulfurous acid? What did you use?

1 MR. BENNETT: Production was
2 greatly hampered. It was immediately known,
3 like you know, you treat the soil when you go
4 up, and you're making your burns before you
5 plant. You do as much as you can pre-plant
6 but it's not enough. And so if -- you know,
7 without the sulfur burner, I'd have to go back
8 to being conventional.

9 MR. FELDMAN: And is that -- the
10 area you're in, is it feasible to grow
11 blueberries conventionally there? Is that a
12 crop that --

13 MR. BENNETT: Well conventionally,
14 it would be easy for using sulfuric acid, yes.

15 MR. FELDMAN: Is that what the
16 conventional guys are doing?

17 MR. BENNETT: Yes. I mean they're
18 having to spray four to six times a year. I
19 don't have to because my plants are so strong.

20 I'm using my water you know, in
21 such a manner. I'm not really flushing that
22 much away. I mean seeing exactly what goes

1 past the root system. Capacitor water
2 monitors tell me exactly what's in the soil.
3 What's gone down.

4 I have five depths and each of my
5 soil types will be eight stations. It's
6 pretty elaborate to know exactly how much
7 water you're using.

8 MR. FELDMAN: Okay. Thank you.

9 CHAIR RICHARDSON: Harold?

10 MR. AUSTIN: I've got a wee bit of
11 background with organic blueberries as well.

12 MR. BENNETT: Super.

13 MR. AUSTIN: The alternatives to
14 using the sulfur burners and the sulfurous
15 acid you alluded to would be citric acid.
16 Also, I would assume that you would probably
17 use maybe the dry sulfur compounds either as
18 you're designing your berms or later as a soil
19 amendment.

20 From an environmental standpoint,
21 but more so from a plant and a worker health
22 standpoint, physically from the corrosiveness

1 of the other materials, isn't sulfurous acid
2 a much safer, more benign way to do your water
3 treatment and amendment versus the options
4 that you currently would have otherwise
5 organically?

6 MR. BENNETT: Yes, my other option
7 would be citric acid. We've already seen how
8 expensive it would be.

9 The carbon footprint, because I'd
10 have to end up bringing tanker loads in, is
11 tremendous. And then you have to be able to
12 find a stable source of it. So it's extremely
13 difficult.

14 Redid my berms this last summer.
15 And you know, I put as much you know, wettable
16 organic sulfur in there, in the deal. But
17 it's just not the same. And it's insane
18 trying to work with the water situation, what
19 it's come to in California.

20 And the pH coming in the water.
21 And that's, you know, those water laws are
22 allowing certain things going on, that you

1 know, an organic basis we just couldn't -- you
2 know, can't utilize.

3 CHAIR RICHARDSON: Thank you very
4 much for your comments.

5 MR. BENNETT: Thank you.

6 CHAIR RICHARDSON: The next
7 speaker is Neil Miller and we have, let's see,
8 one -- in addition to Neil we have one, two,
9 three, four, five more persons to speak before
10 we'll take the lunch break. So we'll have to
11 make some time adjustments at that time.

12 MR. MILLER: Good morning. My
13 name is Neil Miller. I'm a Business
14 Development Manager with PQ Corporation.
15 Thank you for the opportunity to speak on
16 aqueous potassium silicate in the sunset
17 review process.

18 I've had a chance to review the
19 published technical reports. The 2003 TAP
20 review, the 2007 NOSB formal recommendation
21 and the more recent January 2014 technical
22 evaluation report. PQ Corporation has made

1 synthetic aqueous potassium silicate for more
2 than 90 years.

3 Aqueous potassium silicate has
4 many industrial uses, including use in
5 detergent formulations, agricultural
6 formulations, wastewater treatment and others
7 all deriving for the need for -- from the need
8 for soluble silica.

9 The aqueous potassium silicate
10 product in its concentrated form has 21
11 percent soluble silica in water with
12 solubility maintained with eight percent
13 potassium oxide derived from potash.

14 The silica is derived from
15 crystalline high purity sand. Heavy metals
16 are nondetectable. There is no organic carbon
17 in the product. The pH of the concentrate is
18 11.

19 There are three main points
20 associated with use of aqueous potassium
21 silicate in agriculture. First the silica is
22 fully soluble in water. And therefore fully

1 available for the plant to use. This is
2 unlike any other silica or silicate product
3 available for agricultural use.

4 Second, the silica, although
5 derived from crystalline sand is an amorphous
6 form and so has the features of
7 bio-availability, solubility and buffering.
8 Finally, use concentrations are .25 to 1.0
9 percent. That is up to 100 times dilution
10 with water. The pH is now 10 and
11 probabilities of environmental contamination
12 and bio-diversity impact are mitigated.

13 Regarding risk to human health,
14 particularly at use concentrations, the
15 January 2014 technical evaluation report notes
16 these as negligible. On line 581 regarding
17 risk to the environment, again at use
18 concentrations, the January 2014 report notes
19 these as expected to be negligible. That's
20 line 416.

21 EPA currently has this listed on
22 4(b), will not adversely affect public health

1 or the environment. We are not aware of any
2 regulatory changes associated with aqueous
3 potassium silicate.

4 We have organic customers through
5 distribution for aqueous potassium silicate.
6 And this business continues to grow. We
7 respectfully request relisting of aqueous
8 potassium silicate on the National List.
9 Thank you for your attention.

10 CHAIR RICHARDSON: Thank you.
11 Questions, comments? Thank you very much.

12 MR. MILLER: Thank you.

13 CHAIR RICHARDSON: The next
14 speaker is Stephanie Rose and she will be
15 followed by Julie Weisman.

16 MS. ROSE: Hopefully I don't faint
17 up here.

18 CHAIR RICHARDSON: Oh, we're a
19 friendly bunch.

20 MS. ROSE: I don't know about
21 these guys, though. I'm Stephanie Rose. A
22 technical service rep at PQ Corporation,

1 manufacturers of aqueous potassium silicate.

2 First I'd like to thank the NOSB
3 Board for allowing us to come today to speak.
4 I'm here to submit technical information on
5 aqueous potassium silicate so the Board has a
6 good profile of the material when you make
7 your recommendation on the sunset review.

8 Professor Datnoff has already
9 presented information on the mode of action
10 and efficacy of potassium silicate. I
11 submitted several comments online already
12 today. And I would like to focus on the
13 safety of potassium silicate.

14 However, before I begin, I would
15 like to note that potassium silicate is only
16 allowed by the NOP for use in disease control
17 and insect control. Because of the history
18 and its petition process, I think there has
19 been some misunderstanding on its use and
20 consistency with OFPA.

21 At the fall 2007 NOSB meeting, PQ
22 withdrew the plant and soil amendment for

1 hydroponics use because it was clear that it
2 did not meet OFPA criteria. Once that portion
3 of the petition was withdrawn, the crops
4 subcommittee reconvened and voted unanimously
5 to approve potassium silicate because it met
6 all three criteria for OFPA, for disease
7 control and insecticide.

8 The full NOSB Board followed with
9 a unanimous vote in favor of listing as well.
10 I supplied some documents to support that. I
11 hope this addresses the concerns of the Board
12 and groups like Cornucopia Institute, that
13 listing potassium silicate did not result in
14 unintended uses in hydroponics and was
15 approved based on OFPA criteria.

16 Potassium silicate is an EPA-
17 registered bio-pesticide. And I realize that
18 the word pesticide itself brings fear to a
19 great many organic hearts.

20 According to the Federal
21 Insecticide, Fungicide and Rodenticide Act, if
22 a material in any way controls a fungus, then

1 it falls into the fungicide category.
2 Potassium silicate, the silicon part, helps
3 the plant to defend itself against fungus like
4 pottery mildew. Therefore, it controls
5 disease, therefore it has to be a registered
6 pesticide.

7 Pesticides are classified with a
8 single word, poison, danger, warning or
9 caution. It was given caution because that is
10 the friendliest type of product. Potassium
11 silicate has a tolerance exemption.

12 This means that the product is
13 benign and the residue is indistinguishable
14 from potassium and silica already in the
15 environment. It will not be harmful to humans
16 including infants and children.

17 The EPA concluded that the risk of
18 exposure via oral, dermal and inhalation, the
19 most likely routes of exposure for field
20 workers, was negligible. Every pesticide has
21 a restricted entry interval. The time you
22 have to wait to reenter a field after applying

1 potassium silicate is four hours.

2 For comparison, sulfur, another
3 common control for powdery mildew has an REI
4 of 24 hours. Potassium silicate also has a
5 zero preharvest interval. Farmers can harvest
6 their crop the same day as application.

7 Aqueous potassium silicate is used
8 as a foliar treatment in rotation with other
9 organic pesticides to control diseases like
10 powdery mildew. When NOP list was amended in
11 2010, potassium silicate was a brand new
12 technology, a new option for organic farming.

13 PQ Corporation is not an ag
14 company. We're here today because we happen
15 to manufacture a non-toxic benign material
16 that is beneficial in organic farming for
17 controlling disease. Close enough.

18 CHAIR RICHARDSON: Hey, you did
19 that, you see. So you get the magic one for
20 stopping exactly on time. And do you need to
21 finish that sentence?

22 MS. ROSE: Which could impact the

1 success of an organic farmer.

2 CHAIR RICHARDSON: All right,
3 that's good. That's good. It's good. All
4 right, questions? Great. Thank you very
5 much.

6 Next speaker is Julie Weisman and
7 she's followed by Charlotte Vallaeys.

8 MS. WEISMAN: Good afternoon. My
9 name is Julie Weisman. I'd like to thank you
10 all for the opportunity to be standing on this
11 side of the podium speaking to you today.

12 I speak today as a representative
13 of Elan and its affiliates, Natural Flavors
14 and Flavorganics. Elan is a producer of both
15 organic and non-organic flavor ingredients
16 including organic glycerin. Natural Flavors
17 is a producer of both organic and non-organic
18 flavors. Both minor ingredients that have so
19 far not been subjected to commercial
20 availability requirements. Flavorganics is a
21 national brand of certified organic flavor
22 products for home use.

1 I have also served on the NOSB as
2 the chair of the handling committee from 2006
3 to 2008, and as the vice chair in 2008.

4 I am writing to support the
5 petition currently before the Board for the
6 removal of glycerin from its current listing
7 in 205-605(b) of the National List only if
8 there is provision for the use of non-organic
9 glycerin at times or in situations in which
10 there is not an adequate supply of certified
11 organic glycerin available in sufficient form,
12 quality or quantity for particular handlers'
13 use.

14 Glycerin should not remain listed
15 on 605(b) in its current unrestricted state,
16 but neither should it disappear from the
17 National List altogether. I consider the
18 motions brought by the handling committee for
19 the full Board's consideration at this meeting
20 to be huge steps in exactly the right
21 direction.

22 A critical additional step is to

1 broaden the proposed listing of glycerin on
2 606 to include all types of agricultural
3 glycerin that are allowed under NOP
4 regulations and OFPA. I support the comments
5 of the Organic Trade Association in this
6 regard as presented to you yesterday by
7 Gwendolyn Wyard.

8 Now let's talk about gellan gum.
9 I'm the person who is the chair of the
10 handling committee presided over the original
11 listing of gellan gum on 605(a). So I want to
12 let you know that you are asking all the right
13 questions and I also need to say, been there,
14 done that.

15 I want to make sure that the
16 current Board is aware that the 2006/2007
17 Board did have full access to CBI from the
18 original petitioner. In addition,
19 representatives of CP Kelco were available
20 over the course of at least two meetings and
21 on any other occasions in between to answer
22 our questions, and there were many.

1 Like you, we were troubled by the
2 use of IPA for instance. However, as we
3 reviewed and re-reviewed the manufacturing
4 process and the provisions of OFPA, and the
5 rule, it became clear that gellan gum is not
6 synthetic.

7 There is nothing in the rule that
8 prohibits the use of isopropyl alcohol as a
9 processing aid used to manufacture allowed
10 non-synthetic materials on the National List.
11 And furthermore, IPA does not create a
12 chemical change in the gellan gum and is
13 removed from the final gellan gum product.

14 And I do not use gellan gum or
15 manufacture it, by the way. I have seen
16 nothing in the current review of this
17 material, including during public comment
18 yesterday that is in any way different than
19 what was discovered by this Board in previous
20 reviews.

21 And all our deliberations on this
22 material are preserved for your reference in

1 meeting transcripts, final recommendations and
2 numerous historical documents of which I
3 strongly encourage you to make use. It is not
4 your job to rewrite history.

5 It is your job -- oh shoot, sorry.
6 It is your job to review carefully and
7 thoughtfully every ingredient on the National
8 List every five years. That has been done,
9 and that is continuing to be done. And I
10 encourage you to make use of all the resources
11 at your disposal.

12 I would like to thank Chairman
13 Richardson, especially for her thoughtful
14 comments yesterday. I would like to thank the
15 outgoing members, Joe, Jay, Wendy and John.
16 I encourage you to stay engaged in this
17 process. Thank you.

18 (Applause)

19 CHAIR RICHARDSON: Thank you. You
20 finished right at that red buzzer. Any
21 questions? Okay, great. Thanks.

22 The next speaker is Charlotte

1 Vallaeys to be followed by Jane Parker.

2 MS. VALLAEYS: Hi, my name is
3 Charlotte Vallaeys with Consumers Union.

4 Nothing hurts trust like broken promises, and
5 that goes for consumer trust in the organic
6 label.

7 The promises are in the law.
8 Prohibited substances can be exempt for a
9 five-year period only if they have been
10 carefully reviewed and only if they are
11 essential, consistent with organic principals,
12 and don't potentially harm human health or the
13 environment.

14 The growth of the organic industry
15 is dependent on keeping that trust with
16 consumers. Organic grows not in spite of
17 having strong restrictions, but because of it.

18 What does it mean to be essential?
19 Is something essential if it means consumers
20 don't have to shake their pineapple juice? Or
21 if it gives a milk-free beverage a milky mouth
22 feel? Or in the case of a whole algal flour,

1 if it means consumers can eat industrially
2 fermented microalgae instead of organically
3 grown food. Whole algal flour is petitioned
4 as a healthy substitute in processed foods, a
5 substitute for organic milk and organic eggs,
6 which according to the petitioner are
7 unhealthy. So is it essential? Clearly an
8 organic alternative exists. Organic food.

9 The question then becomes whether
10 you agree that organic milk and organic eggs
11 aren't healthy and should be replaced. And
12 whether that's consistent with organic
13 principals. We certainly don't think so.

14 We especially ask that the NOSB
15 ensure that ingredients such as whole algal
16 flour will not be added to organic foods under
17 the listing for microorganisms. During the
18 sunset review, we ask that you restrict this
19 listing to microorganisms that are necessary
20 as starter cultures for natural fermentation.

21 We often hear about materials and
22 their GRAS status. So I'd like to take a

1 minute to talk about what GRAS status actually
2 means.

3 It means the manufacturer
4 determined their ingredient is safe. That
5 they share this determination with the FDA.
6 And after reviewing the notification, the FDA
7 wrote a letter to the manufacturer saying,
8 quote, the agency has not however made its own
9 determination regarding the GRAS status of the
10 ingredients.

11 As always, it is the continuing
12 responsibility of the petitioner to ensure
13 that food ingredients that the firm markets
14 are safe. FDA GRAS does not mean the FDA has
15 independently reviewed the substance or
16 performed its own safety evaluation.

17 When we raised concerns in our
18 spring comments about gellan gum, that's
19 exactly what we were doing. Raising concerns
20 and asking questions. Why? Because the
21 original petition for gellan gum was no better
22 than the petition for algal flour.

1 The entire section on
2 manufacturing was redacted. Organic is
3 supposed to offer a safe haven in our food
4 supply. A properly regulated system with
5 meaningful, periodic review and re-review.
6 The first step in meaningful review is full
7 transparency, and that includes transparency
8 to the public.

9 We were disappointed to see in the
10 handling subcommittee proposal that it
11 recommends relisting gellan gum based on,
12 quote, consumer expectation of taste and
13 texture. Yes, we agree that consumers have
14 expectations.

15 The vast majority of them, around
16 90 percent, have expectations that are rooted
17 in the law. That organic foods be free from
18 GMOs, artificial ingredients, and artificial
19 processing materials.

20 When we speak for consumers, our
21 numbers are based on hard data, our nationally
22 representative surveys. But that aside, NOP

1 regulations actually prohibit adding
2 non-organic materials to the list if their
3 primary purpose is to improve taste and
4 texture.

5 We urge you to remove marsala,
6 sherry and tragacanth gum from the National
7 Lists. We also urge you to contact our senior
8 scientist at Consumers Union, Michael Hanson
9 for his input on defining excluded methods.

10 He was too busy working on GMO
11 labeling campaigns in Colorado and Oregon to
12 submit his comments on time. But we hope that
13 you will seek his input. Thank you.

14 CHAIR RICHARDSON: Thank you. Any
15 questions for Charlotte? Yes, Zea and then
16 Jay.

17 MS. SONNABEND: Can you provide us
18 with Michael Hanson's contact information?

19 MS. VALLAEYS: Yes. I'll be glad
20 to.

21 CHAIR RICHARDSON: Jay?

22 MR. FELDMAN: Thank you Charlotte.

1 We all support growth. That's why we're here.
2 I know on the environmental side we see this
3 growth of this industry as solving a lot of
4 environmental and health problems.

5 So when we hear in this room that
6 the growth of the industry equates with
7 consumer trust, is that an accurate way to
8 assess consumer trust? That would be --
9 that's part of my question then.

10 And what -- how does trust factor
11 into -- so it's two parts. How does trust
12 factor into the development of these other
13 labels, if it does at all?

14 MS. VALLAEYS: Right, so the
15 question about consumer trust and how you
16 measure consumer trust. When we developed our
17 two surveys, we designed them with our social
18 scientists at the National Research Center at
19 Consumers Union, with three different
20 questions to get at that.

21 Is -- you know, why -- because the
22 question that was raised in the research

1 priorities document was why are consumers
2 buying it, right? Why are they buying it if
3 they don't want it?

4 And so that's why we designed it
5 to ask three sets of questions. Is it
6 important to consumers? Do they think it's
7 currently allowed? And do they think it
8 should be allowed?

9 And so that gets at why are they
10 buying it if they don't want it? So what we
11 found is that about three-quarters of
12 consumers don't think for example that
13 artificial ingredients are in organic food.

14 Which tells you if they're buying
15 it, they're buying it not because they're okay
16 with it. But because they don't think that
17 it's in there. Meaning, they're being misled.

18 And so consumers can be misled
19 with labels. It does happen. And we asked
20 the same set of questions for the natural
21 label. And I think everyone here would agree
22 that when it comes to the natural label, yes,

1 consumers are being misled. That's the
2 logical conclusion.

3 But I think we have to hold the
4 organic label to that same standard. And so
5 it's a you know, it will be a slow process.
6 But as more and more consumers do learn in
7 that second set of questions, that the organic
8 label in fact does not mean that it has no
9 artificial ingredients, that you do have to
10 check that ingredients list. I think that
11 that's where trust starts to erode.

12 And that's what we all have to be
13 very -- we have to keep that in mind during
14 these discussions.

15 MR. FELDMAN: Yes, I just don't
16 want to leave the impression that, you know,
17 we don't believe that synthetics should be or
18 could be allowed in organic. So you're not
19 suggesting that every consumer thinks there
20 are no synthetics in organic, or are you?

21 And what can we do as a community
22 to educate consumers that the synthetics that

1 are in organics are evaluated to the most
2 rigorous standard that I've ever seen in a
3 regulatory process?

4 MS. VALLAEYS: Right. I mean, you
5 know, we still rate organic as meaningful.
6 And that's meaningful. It's just -- it's no
7 longer highly meaningful and that's in part
8 because when we can't tell consumers in our
9 communications with them that every synthetic
10 ingredient that is in there has been carefully
11 reviewed and approved by the NOSB.

12 That is what we want to tell them.
13 But we cannot do that because that would not
14 be true.

15 Two weeks ago there was a new
16 toddler milk with the organic seal that came
17 on the market. It has 37 artificial
18 ingredients. Six of them you reviewed in
19 Providence and were rejected. Actually two of
20 them were the meeting before that and were
21 rejected for anything other than infant
22 formula.

1 Now it's on the market. It's
2 there. So we have -- we cannot tell consumers
3 look for that label and you can be assured of
4 this and this. We can't tell them that
5 because -- because of this.

6 So you know, that's the issue of
7 trust. And the other thing is, you know, when
8 you review things, we want to tell consumers
9 that you are reviewing it according to these
10 criteria, the essentiality, the potential harm
11 to human health.

12 And so you know, and we want to be
13 able to tell them that that happens. And so
14 that's why we come up here and urge you to use
15 those criteria in your decisions. Because
16 that is important. Because that will go back
17 in our communications with consumers. And it
18 informs how we communicate with them about
19 different labels. In this case, the organic
20 label.

21 CHAIR RICHARDSON: Thank you
22 Charlotte.

1 MS. VALLAEYS: Thank you.

2 CHAIR RICHARDSON: The next
3 speaker is Jane Parker and the final speaker
4 of the morning will be Marty Mesh.

5 MS. PARKER: Good afternoon, or
6 should I say good day Madam Chair, ladies and
7 gentlemen. I want to thank you for giving me
8 the opportunity to speak on an issue which is
9 severely affecting several Australian farmers
10 and processors.

11 In particular five farmers and one
12 processor that have sent me here. And by the
13 way if I -- my accent is confusing you, I
14 actually spent the first half of my year in
15 Scotland, life in Scotland. These farmers
16 supply herbs and spices to the processor
17 Gourmet Garden who sells 60 percent of their
18 product to the U.S. under the made with
19 organic and organic categories.

20 I'm a retired farmer and a
21 consultant and work with growers and
22 processors on research and development

1 programs. But also channeling them through
2 all the muddy waters of supplying products to
3 organic markets in Australia, U.S. and the EU.
4 All with different requirements.

5 And here I have to say that I
6 still wish that the Australian government and
7 organic community supported its own as much as
8 you guys do. You have something very special.

9 Today's subject is the greatest
10 challenge we have had. Why? Because we don't
11 understand how or why it happened and I hope
12 you can help me here.

13 On June 9, 2014, the Organic
14 Insider published a memorandum re electrolyzed
15 water. Electrolyzed water is generated by
16 passing an electric current through a diluted
17 solution of pure salt and water.

18 This delivers two compounds.
19 Anolyte at the anode and catholyte at the
20 cathode, each collected separately. In
21 anolyte hypochloric acid is the dominant
22 active compound and is used as an

1 antimicrobial and a sanitizer, but this
2 solution is chemically exactly the same as a
3 dilute sodium hypochlorite solution, 80
4 percent more effective and can be made on farm
5 or in factory.

6 Sodium hypochlorite is on the
7 National List. There's only three differences
8 between dilute hypochlorite and havolite. The
9 method of production, the pH at what it exists
10 and the hazardous component. Sodium
11 hypochlorite is classed as hazardous and
12 anolyte produced onsite, the dilute nature of
13 the solution means it's not hazardous.

14 The second solution is catholyte
15 which is sodium hydroxide, also on the
16 National List. So here comes the challenge.
17 We've been asked to prepare a petition to put
18 electrolyzed water on the National List.

19 Is it appropriate for petition for
20 a substance that is two compounds, one
21 specifically already on the National List and
22 one a dilute in water rendition of a substance

1 already on the National List, that's sodium
2 hypochlorite? Especially when the two
3 compounds are produced separately in two
4 separate areas of the machine and are not
5 mixed.

6 Also, how did such a memo happen?
7 Was there consultation about it? The users in
8 Australia didn't hear about it. And here is
9 the sad part.

10 By the end of the month after the
11 memo, five growers had received major cards
12 for its use. One grower received their card
13 one hour after they received their renewed
14 certification.

15 If their crops become an
16 inappropriate food safety issue, their
17 livelihood is on the line. Why? Because
18 peracetic acid is not allowed for use in
19 certified organic production in Australia.
20 And they have no alternatives except for
21 full-blown chlorine, which they will not use
22 because it taints the delicate herbs because

1 of a slow release of hypochloric acid.

2 They are trying to approve
3 sanitized EG citric acid do not react well
4 with the chloroform green leafeys. So now
5 they use nothing.

6 So my question. Why did the USDA
7 NOP send out such a memo which I've later
8 heard was at the discretion of auditors. And
9 can I say that the auditors of these growers
10 have no discretion for a product that's been
11 used for over a decade, effecting hundreds of
12 growers, processors and retailers without a
13 sunset period. Can I say that? Or at least
14 some further guidance as to how to proceed.

15 And finally can I have one word
16 because I've come all the way? And finally
17 can we refer the memo with some guidance that
18 allows us to finalize the petition process,
19 putting it through the necessary steps to get
20 hypochloric acid added to the National List.
21 And may I ask in a hurry?

22 CHAIR RICHARDSON: Thank you very

1 much. Questions, comments? Miles?

2 MR. McEVOY: Yes. This is an
3 issue that we issued a clarification. What we
4 call a material clarification in June as you
5 mentioned on electrolyzed water.

6 This is very much why a material
7 review can be quite difficult for both the
8 National Organics Standards Board, for the
9 certifiers and others involved in the organic
10 trade. We had gotten information from
11 certifiers that some certifiers looked at
12 electrolyzed water as an allowed
13 interpretation of the chlorine allowance on
14 the National List and others thought it was a
15 prohibited substance.

16 So we took a look at it and we did
17 an analysis and we determined that
18 electrolyzed water, it does not meet the
19 requirements. It's not on the National List.
20 So that's why we issued that material
21 clarification.

22 So in order to have electrolyzed

1 water considered, a petition needs to be
2 brought in front of this Board for
3 consideration. So that's the -- kind of the
4 background explanation on that.

5 It's not on the National List and
6 therefore it can't be used.

7 MS. PARKER: So can I ask a
8 question, a further question? Because
9 electrolyzed water is actually two components.
10 Sodium hydroxide and hypochlorous acid. So is
11 the petition -- what's the petition for,
12 because sodium hydroxide is already on the
13 National List?

14 MR. McEVOY: Yes, we can discuss
15 this with you outside of this meeting.

16 MS. PARKER: Yes, I'd like that,
17 yes.

18 MR. McEVOY: But we have already
19 received some petitions for adding
20 electrolyzed water to the National List. So
21 that process is in process.

22 MS. PARKER: Yes, but that was

1 from us and it was because it was recommended.
2 And I have to create that. Can I talk to you
3 about it later? Thank you.

4 CHAIR RICHARDSON: Thank you for
5 bringing this to our attention. The final
6 speaker of the morning before we break for
7 lunch is our good friend Marty.

8 MR. MESH: I was requested to go
9 last. Don't start the clock yet. All right,
10 now you can.

11 All right, so Marty Mesh,
12 Executive Director of Quality Certification
13 Services, Florida Organic Growers. I started
14 farming organic in '72. My thing says as it's
15 been repeated to the outgoing Board members,
16 the current, the returning Board members, the
17 National Organic Program staff and the USDA,
18 other USDA staff that were here.

19 The presentations were very
20 helpful. I hope to check them out. Given the
21 lighting in here, I hope they'll all be online
22 and available. You can ask me questions about

1 Jim's -- Jim Pierce's certifier perceptions
2 later if you want, as well as his humor.

3 I think I do support Jim's
4 legitimate points of his comments as well
5 though as Jo Ann's, Tom Harding's, John
6 Ashby's, Kelly Pepper's, John Brunnquell's.
7 The comments take a longer term macro-view of
8 modern organic agriculture and the evolution
9 of the industry.

10 My comments in Texas as I remember
11 were focused on civility dialog and the plan
12 to keep our community eye on the prize as far
13 as the ecological and health promise. And
14 potential of expanding organic agriculture and
15 production.

16 I'm happy to see that the tone and
17 civility has greatly improved. And appreciate
18 the Chairwoman's guidance in this meeting.
19 But the eye on the prize still seems unclear.
20 A few thoughts. A few random thoughts.

21 2014 research objectives that were
22 voted on, why not do that after public comment

1 and include the consideration? Because given
2 where we are with FISMA policy work that we're
3 involved in, we see the need to get objective,
4 credible research looking at manure and
5 compost and pathogen loads in biologically
6 active soils.

7 The data collection that was
8 mentioned in the one time technical upgrade.
9 I hope that Betsy, if she's still here, or the
10 NOP will incorporate into the -- your new
11 database thing, the overlap between the
12 desired data between ERS which will be NASS
13 data as well as the NOP into the organic
14 integrity database to reduce duplicity and
15 data submission tracking.

16 And perhaps you could even do a
17 capacity building event for small nonprofit
18 organizations for capacity building. It might
19 go a long way to achieve the data gathering
20 goals in multiple USDA programs.

21 The -- I think one thing, I won't
22 do Okragate at this one given the time. But

1 I do have a technical correction on the tee
2 shirt thing. And we did bring that to
3 attention. And we were going to file a
4 complaint, but it is an excellent
5 certification program doing really good work.

6 We kept digging and we learned
7 that that was not a USDA thing. And so I want
8 to clarify that that was not a USDA shirt.
9 But what we have learned since then is that
10 the USDA compliance division is -- has been --
11 or will hopefully undertake an investigation
12 to get to the bottom of it.

13 And I did it out of support in
14 principal but also for -- in support of
15 organic cotton producers. Finally, Betsy
16 mentioned now -- Betsy's still here. But she
17 mentioned that USDA stands to process an
18 organic research and promotion program
19 application if one is received by the
20 industry.

21 And as I shared the building with
22 60 thousand young farmers and I wore a tee

1 shirt today, an organic tee shirt by the way,
2 that says organic on it. And I noticed
3 somebody looking at me in the elevator. I
4 could sense the lack of presence, any presence
5 at the FFA convention.

6 And hopefully a research and
7 promotion and one that funds information could
8 be a solution to having a presence -- that
9 organic would have a presence at a place where
10 there's 60 thousand beginning farmers or
11 future farmers there. As well as maybe
12 research for cotton.

13 (Applause)

14 MR. MESH: Thank you. Any
15 questions?

16 CHAIR RICHARDSON: Questions?
17 Questions for Marty? Do you want a tee shirt?
18 That's the question.

19 MR. MESH: We can talk about it
20 later.

21 CHAIR RICHARDSON: Okay. Hold on
22 a minute Marty. Miles wishes to respond to

1 some of the comments that you made.

2 MR. MESH: I think we go to lunch
3 don't we now? Sorry.

4 MR. McEVOY: Yes, there are a lot
5 of things there, it was hard to keep up with
6 you. But thanks for bringing to our attention
7 the USDA organic non-cotton -- non-organic
8 cotton tee shirt.

9 We have -- I actually filed a
10 complaint about it. And it's currently being
11 investigated and appropriate enforcement
12 action will be taken. Sometimes it takes a
13 while as --

14 MR. MESH: And all I can say is
15 luckily you were working with really one of
16 the best certifiers there were in trying to
17 get to the bottom of this.

18 MR. McEVOY: Absolutely. The
19 other point is on the FFA conference that is
20 here. It's a -- there are -- yes, thousands
21 of them here. Future Farmers of America. And
22 there are some organic organizations that are

1 present to try to show the future of organic
2 agriculture to these young folks.

3 Organic Valley has a booth over
4 there. OCIA International. And the Organic
5 Consumers Association. So thanks for those
6 organizations for going over there and
7 explaining organics to those young farmers.

8 And if you see anybody walking in
9 the hall, thank them for their investment in
10 the future of agriculture and talk to them
11 about organics. Because it's really important
12 for the future of agriculture that organic is
13 a big piece of that future.

14 So, thanks from bringing that up
15 Marty.

16 CHAIR RICHARDSON: Thank you
17 Miles. Before you go to lunch, Mac has to
18 announce the tee shirt and I guess this cup
19 award, whatever it is. Mac?

20 MR. STONE: Okay. So this is the
21 good news that the list is longer than last
22 year. And again, I think everyone in the room

1 appreciates the respect for the time.

2 We know it's short. The Board
3 deliberates every pre-meeting how much time do
4 we have? We want to -- the importance of
5 public comment is a really big part of this
6 whole event.

7 Having said that, the ones that
8 nailed it on timing, Julie Weisman, Gisela
9 Wittenborn who's leaving, you can stop up
10 before you get on a plane in a minute.
11 Lawrence Datnoff, John Ashby, Charlotte
12 Vallaey's and Marty if he so chooses.

13 Those that stopped in respect for
14 the timing. Bill Wolf, Rebecca
15 Thistlethwaite, Jim Winter, Will Fantle, Terry
16 Gong, Stephanie Rose. So thanks to all of you
17 for doing a great job of public comment.

18 (Applause)

19 CHAIR RICHARDSON: So it is time
20 to break for lunch. And given the fact we're
21 basically -- we're more than half an hour
22 behind, I would like to suggest that we start

1 at 2:00 p.m. That's 2:00 p.m. So that gives
2 you just over an hour to get a bite to eat.

3 (Whereupon, the above-entitled
4 matter went off the record at 12:52 p.m. and
5 resumed at 2:05 p.m.)

6 CHAIR RICHARDSON: All right,
7 everybody. It is five minutes past 2:00 and
8 I'd like to start this afternoon's meeting.
9 If you need to talk, please go outside.

10 The first items on the agenda this
11 afternoon is an additional public comment
12 speaker who was unable to be fitted in this
13 morning. So I would like to welcome Kim Dietz
14 to the commenter stand and let us know what
15 you think. Thank you.

16 MS. DIETZ: Thank you. Thank you
17 for recognizing me at the very last minute.

18 My name is Kim Dietz and I'm
19 giving comment today as a citizen, past NOSB
20 member, and my comments do not reflect those
21 of my employer.

22 I served on the NOSB from 2000 to

1 2005 as a handler representative and as
2 Materials chair for three of those five years.
3 It was during my role as chair of Materials
4 that we developed and approved the original
5 sunset process. I thought it would be helpful
6 for this Board to hear quotes from the minutes
7 of the 2004 NOSB meeting, a meeting that first
8 established the sunset process. These
9 statements I will be reading are questions
10 asked from that Board in 2004 to help clarify
11 the process, and this is going to be dialogue
12 between the Board and the Program.

13 "So what is sunset?" "Sunset is
14 not unique to this program. It does happen
15 with many laws and many regulations. Sunset
16 is a call to review the conditions that
17 warranted putting a material on the National
18 List in the first place. If we receive no
19 comments on a material during this process
20 regardless of what the Board thinks, the
21 material goes away. It will not be available
22 for use."

1 Other question. "When we go
2 through the sunset, when we do this procedure,
3 are we putting something back on the List for
4 five years or are we keeping it on the List
5 for another five years?" Answer: "You're
6 renewing this exemption. If it's an allowed
7 material, you're saying we've looked at it,
8 we've considered all the evidence; i.e.,
9 public comment, TAP reviews, and you are
10 renewing the exemption for this allowed
11 material for another five years."

12 "Is sunset an event?" "There's
13 sort of a feeling and people sense that, okay,
14 sunset, it's an event. Well, sunset is not an
15 event. From now on sunset is an annual
16 activity that will take place. You understand
17 that? Every year that you add materials, five
18 years later" -- you know, quote this --
19 "'someone is reviewing the need for those
20 materials to continue.'" Okay. I repeat.
21 "Someone is reviewing the need for those
22 materials to continue."

1 "This is the first Board that will
2 initiate a sunset process, but some of you
3 won't even be on the Board by the time the
4 sunset comes and goes. Every five years,
5 every five years after that will be an
6 effective date on the publication of the final
7 rule and the clock will start ticking over and
8 over again. Therefore, what you want to
9 realize is that sunset is a growing activity.
10 It will become a bigger and bigger job every
11 year because it will never just be a one-time
12 review to see if it's okay. It goes on
13 perpetually.

14 "And that's one reason, that's a
15 very important reason why the process that we
16 laid out for you through rulemaking, it must
17 withstand the annual action by every Board.
18 You've got to take into consideration the big
19 picture. There have been years and years of
20 activity taking place to put materials on the
21 National List. When you take into
22 consideration how many materials have made it

1 onto the list, they've gone through scientific
2 research, they've gone through public comment,
3 final rulemaking. And so the data that
4 supports those materials that are currently
5 listed on the list already have a foundation
6 established."

7 So my personal comments; I'll end
8 the quotes from the 2004 meeting, many
9 commenters over the past few days have
10 mentioned that the sunset process is
11 automatically to remove a material from the
12 National List. Well, in some ways they're
13 correct, but only if there's no public comment
14 received to renew the listing. And if there
15 are comments to renew the listing, the only
16 mechanism to remove materials is if there's an
17 alternative, new evidence or a change that
18 warrants its removal.

19 I do see the sunset process
20 working. Many of us in this room are
21 dedicated to continuously --

22 (Timer expired and sounded)

1 MS. DIETZ: Thank you. Any
2 questions?

3 CHAIR RICHARDSON: Do you have a
4 lot more words there?

5 MS. DIETZ: No, not much at all.

6 CHAIR RICHARDSON: Just say.

7 MS. DIETZ: Many of us in this
8 room are dedicated to continuously improving
9 and protecting the definition of "organic."
10 I urge you to follow the process that past
11 Boards have established and allow those of us
12 who are dedicated to this industry to continue
13 to find alternatives and to remove materials
14 that are no longer needed. Thank you.

15 CHAIR RICHARDSON: Thank you.
16 Comment?

17 MS. FAVRE: More a comment than a
18 question. I appreciate you coming up and
19 giving us historical perspective. Those of us
20 that weren't on the Board at that time find
21 that helpful. So thank you.

22 MS. DIETZ: Thank you. Okay.

1 Good luck.

2 CHAIR RICHARDSON: The next item
3 on the agenda is actually to allow Deputy
4 Administrator McEvoy to introduce the new
5 Board members, some of whom are here, as I
6 understand it. Is that correct?

7 MR. McEVOY: Yes. Yes, I'd like
8 to introduce some of the new members to the
9 National Organic Standards Board. I think at
10 least three out of four of them are here in
11 the room. If they could just come up to the
12 podium and introduce themselves, that would be
13 really great. We have Lisa de Lima, Tom
14 Chapman and Ashley Swaffer that are here and
15 have been here the last day or so.

16 So Lisa de Lima, welcome.

17 MS. DE LIMA: Thank you. Hi. So
18 I'm Lisa de Lima. I'm going to be incoming to
19 the retailer seat when Joe leaves in January.

20 Really excited to be involved in this
21 process.

22 Currently I work at Mom's Organic

1 Market. I've been there for the last 16
2 years. The vice-president of grocery. So I
3 get to do a lot of work in sourcing, setting
4 our standards and making sure that we fulfill
5 our mission, which is why I'm so passionate
6 about Mom's and organics is our mission is to
7 protect and restore the environment, and a
8 large part of that is supporting organics.
9 Produce sections in our store only stock
10 certified organic produce.

11 So I guess I want you all to know
12 that at heart I'm an environmentalist. Jean
13 was one of my teachers back in my undergrad at
14 UVM. So I have -- undergrad degree is
15 political science in environmental studies and
16 a master's in business. And I'm here because
17 I want to support organics. I want to move
18 organics forward because of the implication
19 for positive change in the environment.

20 MR. McEVOY: Thank you, and
21 welcome

22 (Applause)

1 MR. McEVOY: Okay. Ashley?

2 MS. SWAFFER: Hi, I'm Ashley
3 Swaffer. I'm the director of special projects
4 at Arkansas Egg Company and I work with our 46
5 family farmers on animal welfare issues and
6 organic certification. And so I'm really
7 excited to be representing all of our farmers
8 on this adventure that I hear that it is. So
9 I'm really looking forward to taking this
10 position. Thanks.

11 MR. McEVOY: Thanks, Ashley.

12 (Applause)

13 MR. McEVOY: And Mr. Tom Chapman.

14 MR. CHAPMAN: Thank you. I always
15 get nervous with public speaking, so I wrote
16 down a couple notes real quick. I'm honored
17 to be appointed to the organic handler, one of
18 the organic handler seats on the National
19 Organic Standards Board. I think the active
20 democratic participation of stakeholders is
21 critical to the integrity of the organic
22 standards and I believe a core driver behind

1 the success of the organic marketplace in the
2 U.S.

3 I'm eager for the opportunity to
4 give back to the organic community. That's
5 been the basis for my professional career.

6 A little bit about me. My passion
7 for organic food originates with countless
8 hours spent in the kitchen with my mother
9 learning how to cook healthy balanced dinners
10 from scratch. During college I first got
11 involved in organic food systems and I quickly
12 learned that organic food was anything but
13 simple. From the challenge of promoting soil
14 fertility and mitigating pest pressures with
15 limited inputs on the farm, to the challenge
16 facing handlers and finding those few farmers
17 and formulating good tasting products with a
18 limited supply and volatile regulation.

19 Organics is not easy. It never
20 has been, but none of us are here because we
21 thought it was.

22 I'm lucky to have worked my entire

1 professional life in the organic industry
2 starting at QAI and continuing at New Me
3 Organic Tea. I've also had the pleasure to
4 volunteer with CCOF in the CDFA Organic
5 Program. I currently work at Clif Bar in the
6 Bay Area; go Giants, sourcing organic
7 ingredients.

8 Yes, Zea. Go Giants, Zea.

9 (Laughter)

10 MR. CHAPMAN: Clif Bar feeds and
11 inspires adventures through trading nourishing
12 food and supporting a healthy food system. I
13 have an amazing job that facilitates the
14 company's vision of connecting directly with
15 our producers, food makers, understanding
16 their needs, sharing ours, contracting their
17 products, communicating their stories and
18 consumers, be it organic maple farmers in
19 Vermont; Jean, to organic oat farmers in
20 Canada, soy, sunflower farmers in the
21 Heartland or fig and raisin growers in
22 California.

1 As a family and employee-owned
2 company Clif Bar seeks to run a different
3 company that follows five aspirations going
4 beyond the conventional or triple bottom line
5 business model. We measure ourselves against
6 objectives impacting our business brands,
7 people, community and environment. Our
8 commitment to organic falls under many of
9 these aspirations. And to give you some
10 specifics, since going organic Clif Bar has
11 purchased over 425 million pounds of organic
12 ingredients accounting for 72 percent of
13 everything we buy, a number that's grown every
14 year since going organic.

15 During this dynamic time in the
16 organic community it's important for the NOSB
17 representatives to be balanced, willing to
18 hear all opinions and dedicated to finding
19 creative solutions to uphold the integrity of
20 the system while promoting growth. Organic is
21 a value added at the farm level and that can't
22 be forgotten. Handlers hold a unique position

1 and obligation to protect the integrity of
2 that farm-level value-add while maintaining
3 and promoting consumer confidence in this
4 labeling movement. Simply said, we're all in
5 this together. I look forward to working with
6 all the stakeholders and doing my best to
7 represent the diverse group of handlers as
8 part of a great organic community.

9 I'm glad the buzzer didn't go off.

10 (Laughter)

11 MR. CHAPMAN: Lastly, I'd like to
12 thank all the outgoing NOSB members, and
13 particular Mr. John Foster for his service.
14 I have some very large shoes to fill both
15 figuratively and literally. Thank you, guys.

16 (Applause)

17 CHAIR RICHARDSON: Thank you very
18 much and welcome all of you.

19 Now we're moving into the new part
20 of our agenda where we're looking at
21 materials. And I will turn this over now to
22 Harold Austin to begin to deal with the

1 Handling Subcommittee materials.

2 MR. AUSTIN: Thank you, Madam
3 Chair. I'd like to welcome everybody to the
4 Wednesday afternoon session of the NOSB
5 meetings, and this will start the beginning of
6 the Handling Subcommittee presentation to the
7 full National Organic Standards Board of the
8 past semester's work for review, discussion
9 and voting where applicable.

10 The agenda items on the Handling
11 Subcommittee's work plan for this afternoon's
12 presentations will include the following: We
13 will present a brief summary for each work
14 plan item from the most recent public comment
15 period along with the subcommittee's proposal
16 and/or recommendations and motions. We have
17 two proposals for discussion. They are for
18 glycerin, petition for removal from 205.605;
19 for whole algal flour, petition for addition
20 to the National List at 205.606.

21 We have four 2015 sunset material
22 reviews to discuss that have been recently

1 posted for their second and final public
2 comment period that will be brought before the
3 entire NOSB for discussion and vote. They are
4 marsala, sherry, tragacanth gum and gellan
5 gum. We will then follow that with the 10
6 2016 sunset materials that have recently been
7 posted for the first of two mandated public
8 comment periods for discussion and a recap of
9 the public comments. These are not up for
10 vote at this time. Merely discussion and
11 information gathering to assist the
12 subcommittee and the Board with the official
13 sunset review process as required under the
14 recent revised processes.

15 Along with these items I have just
16 mentioned during this past semester the
17 Handling Subcommittee has started to implement
18 the trial phase as required by the February
19 3rd, 2014 memorandum from Deputy Director
20 McEvoy to look at ancillary substances
21 starting with microorganisms, which is a 2016
22 sunset material. The 2015 materials were not

1 required to have ancillary substance review
2 due to the timing of the implementation of the
3 ancillary declaration from the NOP.

4 The subcommittee also performed
5 the task of the preliminary review in
6 establishing the needs and requests for
7 technical reports for the 104 2017 sunset
8 materials which will begin to be posted in the
9 spring for our spring meeting for their first
10 public comment period. That task took an
11 exorbitant amount of time for the subcommittee
12 this past semester simply just because there
13 was "only" 104 of them.

14 We had an extremely packed work
15 schedule and I would like to publicly thank
16 all of the Handling Subcommittee for their
17 hard work, dedication, job well done. Thank
18 you, guys.

19 With that, we'll move into our
20 agenda. Our first agenda item is one of two
21 materials that had a proposal. The first one
22 is glycerin. I'd like to turn it over at this

1 time to Dr. Brines with the NOP to give their
2 opening declaration statement on this
3 material.

4 DR. BRINES: All right. Thank
5 you, Harold. The petition for glycerin was
6 submitted on January 4th, 2013 by Draco
7 Natural Products. The petition requests the
8 removal of glycerin from Section 205.605(b) of
9 the National List. It's currently listed with
10 the annotation produced by hydrolysis of fats
11 and oils. In support of its review the
12 subcommittee did request the development of a
13 technical report, which was completed in 2013.
14 A previous Technical Advisory Panel report was
15 also available from 1995.

16 This petition has been on the
17 agenda of the previous NOSB meeting in April
18 earlier this year. Both the technical reports
19 and earlier proposals including the one being
20 considered at this meeting were posted on the
21 NOP Web site and available to the public in
22 advance of the opening of the public comment

1 period for this meeting. Thank you.

2 MR. AUSTIN: Thank you, Lisa.

3 Based off of the public comments,
4 both written and oral, and in accordance with
5 the "Policy and Procedures Manual," the
6 Handling Subcommittee convened during this
7 morning's break with a quorum present and
8 those not in attendance given the opportunity
9 to tender a vote as well, and we voted to
10 withdraw our current recommendation for
11 glycerin for the purpose of revision and
12 reconsideration at a future NOSB meeting.

13 At this point I'd like to turn it
14 over to Tracy to lead any further discussion
15 on this at this time.

16 MS. FAVRE: Thank you, Harold.
17 The decision to take it back to committee was
18 primarily based upon the fact that, as Harold
19 said, we got considerable confusion and
20 consternation through the public comments in
21 our lack of clarity on the classification
22 motion primarily. As I indicated during, I

1 think it was, Gwendolyn's comments yesterday
2 that it was our intention to give an example
3 of a classification as agricultural for 606
4 while not being all inclusive, but that was
5 pretty clearly not obvious.

6 And so we decided to make an
7 amendment to the classification to correct our
8 oversight. And the program has determined
9 that it is a substantive change and therefore
10 we will have to take it back to committee.
11 The plans to add it to 606 and remove it from
12 605(b) will stand in the new proposal. Thank
13 you.

14 CHAIR RICHARDSON: Do you want to
15 do a motion to send it back to subcommittee?
16 No, not needed?

17 MR. AUSTIN: Not needed with the
18 procedures that we followed this morning.

19 CHAIR RICHARDSON: Very good.

20 MR. AUSTIN: We can open it for
21 discussion at this point though.

22 CHAIR RICHARDSON: Yes.

1 MR. AUSTIN: So having said that,
2 is there any discussion from any members of
3 the Board?

4 (No audible response)

5 MR. AUSTIN: Hearing none,
6 we'll --

7 MR. FELDMAN: Sorry. Do you think
8 the record is clear on why it's being
9 withdrawn?

10 MR. AUSTIN: Just to clarify for
11 the record, with the discussion amongst the
12 Handling Subcommittee the decision was made
13 based off of -- this has been a very difficult
14 material. A lot of moving parts. And we
15 wanted to bring it back to the subcommittee to
16 make sure that when we come forward with a
17 proposal that it's the proper proposal.

18 To change it midstream would have
19 been a substantive change which is not allowed
20 at this point in time. So we've decided that
21 the best approach and the proper procedure
22 according to the "Policy and Procedure Manual"

1 and based off of public commentary would be
2 refer it back to the subcommittee for further
3 deliberation and then we can come back at a
4 later date and time with a motion. That help
5 clarify it, Jay?

6 MR. FELDMAN: Yes, it does.

7 MR. AUSTIN: Tracy?

8 MS. FAVRE: I'd just like to add
9 to expand on Harold's comments, we're on the
10 version 7 of the checklist now. We've had
11 quite a bit of discussion and debate about
12 this. Although he told me they went to like
13 22 on streptomycin, so I don't feel so bad.

14 But so we've had lots of
15 discussion about this. We knew when we put
16 the proposal out that we probably wouldn't get
17 it quite right because there's so many moving
18 parts on this. Because glycerin can be
19 produced in so many ways, some of which are
20 considered synthetic and some of which are
21 not, it's just sort of made it more
22 complicated. And then also it's so pervasive

1 in the use in the industry. We wanted to make
2 sure that we got feedback as much as possible.

3 So we have actually created
4 another proposal which had the ruling from the
5 program been different, we would have actually
6 brought forward and voted upon today. I don't
7 know if it would be appropriate for me to read
8 that classification motion here or not.

9 Jean, you want to provide any
10 feedback on that?

11 CHAIR RICHARDSON: Yes, you could
12 just so that the -- but --

13 MS. FAVRE: Yes.

14 CHAIR RICHARDSON: -- you're not
15 reading it --

16 MS. FAVRE: Yes, it's not a
17 motion, but --

18 CHAIR RICHARDSON: So that people
19 get a better understanding of why we've made
20 the decision to send it back to subcommittee.

21 MS. FAVRE: Yes. Okay. So, the
22 current thinking is that the proposed

1 classification motion would be -- is to
2 classify glycerin as agricultural when derived
3 from agricultural source materials and
4 produced using biological or
5 mechanical/physical methods as described under
6 205.27(a). And then with the annotation to
7 clarify further "produced from agricultural
8 source materials and processed using
9 biological or mechanical/physical methods as
10 described under 205.27(a)."

11 So you'll obviously have an
12 opportunity to comment upon on this when we
13 submit our proposals for the spring meeting.
14 And we hope that if there's further
15 consternation or confusion about it that
16 everybody will give us an opportunity to tweak
17 that so we can come with a viable proposal at
18 the spring meeting.

19 MR. AUSTIN: Thank you, Tracy.

20 MR. BONDERA: Sorry. Harold, I
21 just wanted to verify my understanding and say
22 back what I thought I heard from Tracy,

1 because I may have just had a brain blip and
2 not caught it before. It was what you said
3 before though, not just now.

4 The two listing motions the
5 committee isn't intending to review? It's the
6 classification motion that is up for review?
7 That's what I didn't quite get from your
8 introduction process and I'd ask that you
9 repeat it, please. Thank you.

10 MS. FAVRE: It's not a matter of
11 review. We've actually got a proposal already
12 that we brought with the intent that if the
13 program ruled it wasn't a substantive change
14 that we would vote on today. It was really an
15 intent to clarify the classification motion.
16 So since we have the opportunity now, since we
17 have to go back to committee with it, I'm sure
18 we can have the opportunity to discuss it
19 further in subcommittee if we need to, but I
20 think generally we're okay with its current
21 incarnation. Did that answer your question?

22 CHAIR RICHARDSON: Miles?

1 MR. McEVOY: Yes, I just wanted to
2 clarify why we consider this a substantive
3 change. The proposal as published for the
4 meeting, you can see here, was to -- now I
5 can't quite read that. Let's see. Motion to
6 classify glycerin produced by microbial
7 fermentation as agricultural. So that was the
8 motion that was presented to the public for
9 the public then to weigh in on about this
10 particular petition. And based on the
11 information that the subcommittee received
12 they're wanting to amend that to make it
13 broader than what this classification motion
14 is.

15 And because the proposal that they
16 want to move to a motion would broaden the
17 allowance of glycerin beyond what was proposed
18 to the public that the public had the
19 opportunity to comment on, we feel that it's
20 important that that wider allowance of
21 glycerin, the full public should have an
22 opportunity to respond to that amended motion

1 that will, sounds like, be in front of the
2 public for the spring meeting. Hopefully that
3 makes sense.

4 MR. THICKE: Just a clarification.
5 I'm not sure I understand. The petition
6 requests removal from 605(b) but it doesn't
7 really request putting it on 606. I didn't
8 see it in the petition. Did I misread that or
9 can we put it on without having it being
10 petitioned for that?

11 CHAIR RICHARDSON: Tracy?

12 MS. FAVRE: We did actually raise
13 that question in subcommittee and we were
14 advised through program technical advisory
15 that we do have the latitude to do that.

16 CHAIR RICHARDSON: Any other
17 comments?

18 (No audible response)

19 CHAIR RICHARDSON: There being no
20 motion on the floor, this material will
21 therefore go back to the Handling
22 Subcommittee. Mr. Austin?

1 MR. AUSTIN: Thank you, Jean. All
2 right. Our second material is whole algal
3 flour. Likewise, based off of public comment
4 and in accordance with the "Policy and
5 Procedures Manual" the Handling Subcommittee
6 convened this morning during this morning's
7 break and again we voted to withdraw this
8 recommendation for the purpose of revision and
9 reconsideration at a future NOSB meeting.

10 The rationale for deciding to do
11 this was on the original petition the
12 additional information that was requested by
13 the Handling Subcommittee, there was a
14 tremendous amount of information that had not
15 been included. The manufacturer -- the
16 petitioner during their written public
17 comments and then also during their oral
18 testimonies has provided additional
19 information to the subcommittee.

20 It may not sway whether we move to
21 put this on or not, but we feel on the
22 subcommittee will help us to at least fill in

1 some of the blanks for both the classification
2 and the listing motion on this substance. And
3 so we feel rather than to move this forward
4 for a vote and discussion where we feel it's
5 possibly not inadequately framed we've moved
6 to bring it back to the subcommittee,
7 readdress the issues and bring it back forward
8 where it's clearer and more concise. And that
9 was the rationale behind bringing this back to
10 the subcommittee based off of public
11 commentary we've heard in written and in oral
12 testimony.

13 CHAIR RICHARDSON: Does Lisa, do
14 you need to --

15 MR. AUSTIN: I'm sorry, Lisa.

16 CHAIR RICHARDSON: -- read this
17 into the record?

18 DR. BRINES: Sure.

19 MR. AUSTIN: My bad.

20 DR. BRINES: I can do that before
21 further discussion on this one.

22 The petition for whole algal flour

1 was submitted by Solazyme, Incorporated on
2 September 6th, 2013. And in response to a
3 request from the subcommittee the petition was
4 updated on January 21st, 2014 with a petition
5 addendum.

6 The petition requests the addition
7 of whole algal flour to Section 205.606 of the
8 National List. This material has not been
9 previously reviewed by this Board and no
10 technical report was developed.

11 Both the petition, the petition
12 addendum and the subcommittee proposal were
13 all available to the public and posted on the
14 NOP's website in advance of the comment period
15 for this meeting. Thank you.

16 MR. AUSTIN: Thank you, Lisa. My
17 apologies for the break in procedure. I won't
18 let it happen again.

19 Okay. At this point we can open
20 it up for discussion if there's any questions.
21 Jay?

22 MR. FELDMAN: Is it the

1 committee's understanding that the Board will
2 be receiving or you'll be able to look at CBI
3 associated with manufacturing, what was
4 previously redacted information?

5 MR. AUSTIN: There was a
6 significant amount of information that was
7 provided in their written public testimony.
8 We just haven't had adequate time to review it
9 and really peruse through it enough to give a
10 justified clarification on it. So we need
11 more time.

12 Tracy?

13 MS. FAVRE: Just as a reminder,
14 even though we've considered adopting and made
15 a recommendation for a new CBI policy, we
16 don't have that new CBI policy in place so we
17 can't actually require it.

18 MR. AUSTIN: Thank you for that,
19 Tracy. Any further questions or discussion?

20 (No audible response)

21 CHAIR RICHARDSON: There being no
22 motion on the floor, this material, whole

1 algal flour, is sent back to subcommittee.

2 Harold?

3 MR. AUSTIN: That ends this part
4 of it. We'll begin to move into the 2015, but
5 before we do that I would like to turn the mic
6 back over to you.

7 CHAIR RICHARDSON: Okay. The next
8 several materials that we're going to look at
9 allow us to work with the new sunset policy in
10 place. Prior to doing that I just want to
11 read through sort of the Chair's Sunset 101 of
12 the new process in case there are people out
13 there that don't fully understand it.

14 The NOSB is charged to review all
15 substances within five years of their addition
16 to or renewal on the National List. Since
17 materials were first added to the National
18 List in 2002, there have been two sunset
19 review cycles. Although the word "review" has
20 not specifically indicated a requirement to
21 vote on substances, the tradition has been for
22 the NOSB to put forward motions and to vote on

1 them at the public meeting before sending
2 their advice to the Secretary through the NOP.
3 During those earlier reviews all materials
4 were considered to drop off the National List
5 unless there were motions to re-list them.
6 Hence, the concept of sunset.

7 In September 2013 the NOP changed
8 the sunset process. The new sunset provisions
9 include two opportunities for public input,
10 and this has resulted in a more in-depth
11 review of materials by the subcommittees than
12 in the past, but the new sunset process now
13 results in all materials staying on the
14 National List unless the NOSB review indicates
15 that they should be taken off the List.

16 It is widely agreed that the
17 language in the Federal Register notice of
18 2013 requires clarification. And indeed, for
19 this meeting we have received about 150
20 written public comments about the sunset
21 process from a range of stakeholders. Many
22 have expressed frustration at what they see as

1 precariously convoluted and complex, to quote.
2 And the subcommittees have worked with the NOP
3 staff to develop motions which meet the intent
4 of the new process.

5 Following this meeting I am very
6 hopeful that the NOP and the NOSB will be able
7 to work collaboratively on clear revisions of
8 the sunset process based on our experiences at
9 this meeting and the public comments that have
10 come in over the last few months.

11 Meanwhile, we have work to do.
12 Subcommittees do not make decisions. So in
13 order for the public to clearly understand
14 that a substance could potentially be removed
15 from the National List and given the
16 opportunity to provide comment which could be
17 considered at this meeting each substance
18 comes to the full Board from their respective
19 subcommittee with a motion to remove the
20 substance from the National List.

21 The NOSB acknowledges that this is
22 a somewhat artificial construct but that it

1 meets the intent of the new sunset process.
2 Therefore, NOSB members, your yes vote on a
3 motion to remove will be to recommend that the
4 substance be removed from the National List.
5 Your no vote on a motion to remove will be to
6 recommend that the substance remains on the
7 National List.

8 Harold?

9 MR. AUSTIN: Thank you, Jean. As
10 Jean has stated, for the 2015 substances we're
11 now entering into the second phase of the
12 newly-revised sunset review process. We're
13 still looking and still working to iron out a
14 few of the wrinkles in it, as I think we all
15 are very cognizant of, but what the Handling
16 Subcommittee has already begun to see is that
17 this process will enable us to have a quality
18 exchange of comments from the stakeholders on
19 two separate occasions thus allowing for
20 better clarity, transparency and a better
21 opportunity for information exchange between
22 the NOSB and our organic stakeholders.

1 The sunset process is a great
2 vehicle which we can utilize to show how our
3 organic process should and must work through
4 improved opportunities for communication,
5 through enhanced process for stakeholder
6 feedback and ultimately for two, not one
7 opportunity for public discussion and debate
8 on all materials up for sunset review.

9 With that, I would now like to
10 begin the start of our 2015 sunset materials
11 presentation. The first, we're going to
12 combine two materials, Lisa, to bring to you.
13 I will present to the Board and the NOP from
14 the Handling Subcommittee marsala with a
15 motion from the subcommittee to remove from
16 the National List 205.606(g)(1) and also for
17 sherry, again with a motion and a second from
18 the Handling Subcommittee to remove from the
19 National List from 205.606(g)(2).

20 Lisa, I now turn it over to you.

21 DR. BRINES: All right. Thanks,
22 Harold. So the first material is marsala

1 wine. This material was added to the List in
2 2010. The petition was originally submitted
3 in 2007. As Harold said, it is included at
4 Section 205.606 of the National List at
5 paragraph (g)(1) under the listing fortified
6 cooking wines. Likewise, the petition for
7 sherry was also submitted originally in 2007
8 and it was added to the National List in 2010.
9 It's also included at Section 205.606(g) of
10 the National List under paragraph 2 under
11 cooking wines. Both petitions are available
12 on the NOP Web site and no technical reports
13 have been developed for these substances.
14 Thank you.

15 MR. AUSTIN: Thank you, Lisa. Now
16 I'll turn it over to Tracy to lead the
17 Handling Subcommittee's discussion.

18 MS. FAVRE: Thank you, Harold.
19 Yes, as Dr. Brines has indicated these are
20 very similar materials. They were both
21 petitioned by the same petitioner. They were
22 both used for their unique flavor profile in

1 some of their I think it was frozen entrées.
2 And essentially comments generally supported
3 the removal of the materials as no longer
4 being necessary. One commenter even referred
5 to previous comments from Cornucopia
6 suggesting that not even the original
7 petitioner was using it anymore. And
8 essentially there seems to be no demand for
9 either one of these products, so it seems to
10 be fairly straightforward. Thank you.

11 CHAIR RICHARDSON: One second
12 before we move into discussion. I would like
13 to discuss them separately. We can only
14 really discuss one motion on at a time and
15 vote on one motion at a time. So how about
16 taking sherry first. Colehour, you have a
17 comment?

18 MR. BONDERA: Thank you, Madam
19 Chair. Actually that was my question, if we
20 could consider them together and who and when
21 that decision was made. That was unclear to
22 me process-wise and I think you've addressed

1 it, but I don't know if it has a more general
2 observation that you need to make because I
3 don't know if that -- I didn't understand how
4 that was put forth.

5 CHAIR RICHARDSON: The motion on
6 the floor from the Handling Subcommittee is
7 now for sherry. And when we've finished
8 discussing and voting on that, we will then
9 take up the marsala.

10 MR. AUSTIN: Any discussion?

11 CHAIR RICHARDSON: Mac?

12 MR. STONE: I think, Colehour, at
13 the subcommittee level they're sort of
14 interchangeable in their use, and so because
15 of the big number of sunset materials they
16 were just sort of lumped together in
17 conversation, if you will, at the subcommittee
18 level because they are so close and so similar
19 in nature, but then technically we have to
20 vote separately.

21 CHAIR RICHARDSON: Is the NOSB
22 ready for the vote on this substance, on

1 sherry? Do you understand the motion? The
2 motion on the floor is to -- let's see, should
3 I read -- I should really read it out,
4 shouldn't I? What is the motion?

5 MR. AUSTIN: Jean, I can get it.

6 CHAIR RICHARDSON: Okay.

7 MR. AUSTIN: The motion on the
8 floor from the Handling Subcommittee for the
9 NOSB to vote on would be to remove sherry from
10 the National List of 205.606(g)(2).

11 CHAIR RICHARDSON: So your vote
12 yes is to remove it. Your vote no leaves it
13 on the List. Are you all clear on the motion
14 and how your vote might go?

15 (No audible response)

16 CHAIR RICHARDSON: Thank you. It
17 comes as a seconded motion.

18 So we start with Francis.

19 MR. THICKE: Yes.

20 MS. BECK: Yes.

21 MS. FAVRE: Yes.

22 MR. DICKSON: Yes.

1 VICE-CHAIR FOSTER: Yes.

2 MR. STONE: Yes, ma'am.

3 MR. FELDMAN: Yes.

4 MR. AUSTIN: Yes.

5 MS. FULWIDER: Yes.

6 MS. SONNABEND: Yes.

7 DR. WALKER: Yes.

8 MR. MARAVELL: Yes.

9 MR. BONDERA: Yes.

10 CHAIR RICHARDSON: Yes.

11 DR. TAYLOR: Yes.

12 MR. STONE: Record shows 15 yes, 0

13 nos.

14 CHAIR RICHARDSON: The second

15 motion which comes as a seconded motion is

16 marsala. Harold, could you read the motion?

17 MR. AUSTIN: The motion coming

18 from the subcommittee would be to remove from

19 the National List marsala, remove it from the

20 National List at 205.606(g)(1).

21 CHAIR RICHARDSON: Does everyone

22 understand the motion and what their vote will

1 mean?

2 (No audible response)

3 CHAIR RICHARDSON: Start the
4 voting with Carmela.

5 MS. BECK: Yes.

6 MS. FAVRE: Yes.

7 MR. DICKSON: Yes.

8 VICE-CHAIR FOSTER: Yes.

9 MR. STONE: Yes, ma'am.

10 MR. FELDMAN: Yes.

11 MR. AUSTIN: Yes.

12 MS. FULWIDER: Yes.

13 MS. SONNABEND: Yes.

14 DR. WALKER: Yes.

15 MR. MARAVELL: Yes.

16 MR. BONDERA: Yes.

17 DR. TAYLOR: Yes.

18 MR. THICKE: Yes.

19 CHAIR RICHARDSON: Chair votes
20 yes.

21 MR. STONE: Southerners don't just
22 talk slow. We hear slow. So we go a little

1 slower, but I still came up with 15 yes and 0
2 nos.

3 MR. AUSTIN: Okay. Moving on.
4 The next 2015 sunset material would be
5 tragacanth gum. This comes before the Board
6 as a motion with a second to remove from the
7 National List at 205.606(x).

8 Lisa?

9 MS. ARSENAULT: I'm sorry, can I
10 interrupt? We didn't get who made the motion
11 and who seconded for the last two votes.
12 Could we repeat that?

13 MR. AUSTIN: Do we need to have a
14 new motion?

15 (No audible response)

16 MR. AUSTIN: Okay. So coming out
17 of the subcommittee marsala, the motion was
18 made by Tracy, seconded by Zea. For sherry
19 the motion was made by Tracy, seconded by Zea.

20 For this motion in front of us on
21 tragacanth gum, this motion was made by Joe,
22 seconded by myself.

1 Lisa?

2 DR. BRINES: Thank you, Harold.
3 Tragacanth gum is currently listed at Section
4 205.606(x) of the National List without
5 annotation, but it does include CAS No.
6 9000-65-1. The original petition was
7 submitted in 2007 and it was added to the List
8 in 2010, and no technical report is available
9 for this substance. Thanks.

10 MR. FELDMAN: Madam Chair, I rise
11 to a point of order on this motion. And if
12 you'd like, I could discuss what that is or
13 briefly point out that the point of order is
14 based on two problems, if you'll allow me.

15 CHAIR RICHARDSON: A point of
16 order is being made by Jay. Is this something
17 that deals with the present material that
18 we're dealing at, tragacanth gum?

19 MR. FELDMAN: Yes.

20 CHAIR RICHARDSON: What is your
21 point of order?

22 MR. FELDMAN: Okay. I did prepare

1 this, so hopefully it will be succinct for
2 everybody. But just to give you an overview,
3 the point of order is based on two problems.
4 The motion to remove the material does not and
5 did not reflect the true intent or
6 recommendation of the subcommittee, which is
7 really required under Robert's Rules of Order.
8 And two, the policy as outlined in the Federal
9 Register of September 16th, 2013 for the
10 subcommittee process was not followed in
11 providing justifications as required.

12 I'd like to point out that if the
13 Board finds by majority vote that the
14 subcommittee motions are out of order, it will
15 be returned to the subcommittee for action,
16 for review under the current policy. So let
17 me quickly go through this and then we can go
18 from there.

19 Okay. With subcommittee reviews
20 in the absence of a full Board vote, the
21 material under review can stay on the National
22 List. So the process we're going through

1 right now, this discussion is in no way
2 intended to affect the outcome of what people
3 may want to occur. It's solely focused on the
4 process of how we achieve that outcome.

5 The process issues that I believe
6 are in a sense in violation of the policy is
7 that unless there is a motion to remove a
8 material in subcommittee during the sunset
9 process, the motion does not advance to the
10 full Board for a vote. That's the stated
11 policy. The motion to remove in subcommittee
12 in this case is not justified as required by
13 the FR notice. Citing of OFPA criteria alone
14 without justification does not meet the FR
15 criteria. In this case I believe the
16 essentiality criterion was cited.

17 It was not the intent of the
18 makers of the motion and those voting for the
19 motion to remove the material. The motion to
20 remove confuses the public as we've seen in
21 some of the public comments.

22 While I appreciate, Madam Chair,

1 your presentation at the beginning or start of
2 this section of the meeting, I think it is bad
3 form and sets bad precedent for this Board to
4 on an ad hoc basis choose to reject and ignore
5 the policy and then for the program to allow
6 on an ad hoc basis that in effect rewriting of
7 the policy mid-process.

8 So here are the sections of the --
9 well, I'll start with the instructions. The
10 USDA AMS provided instructions to the
11 subcommittee and it went like this: This was
12 in the document cited by AMS to the public and
13 to the Board as the operative policies
14 governing the procedures of the Board which
15 included both the FR notice of September 16th
16 -- it included the documents for the training
17 session in February of 2014. It included the
18 "Policy and Procedures Manual," as well as I
19 believe the FACA rules.

20 If the subcommittee -- this again
21 is instructions to the subcommittee. If the
22 subcommittee has obtained new information

1 since its last review that supports a motion
2 to remove the substance from the National
3 List, the subcommittee will provide
4 justification that demonstrates that the
5 substance is either harmful to human health,
6 unnecessary because of availability of
7 alternatives and inconsistent with organic
8 production. That was not done in this case
9 because as we know the motion was a procedural
10 motion to get this issue before the Board.

11 Step 4 says if warranted the NOSB
12 subcommittees can develop proposals to remove
13 substances as part of the preliminary review.
14 Any proposals to remove a substance must be
15 justified using evaluation criteria in OFPA
16 and the USDA organic regulations. Proposals
17 to remove a substance must be part of the
18 preliminary review that is posted in advance
19 of the NOSB meeting.

20 Step 5, AMS will publish a Federal
21 Register document announcing a second NOSB
22 meeting and request public comments on each of

1 the subcommittee's preliminary review.

2 Step 6, after NOSB discussion of
3 each preliminary review and any proposals, the
4 NOSB will vote on any motions to remove
5 substances from the National List. If a
6 subcommittee had published a proposal to
7 remove a substance, then a member of the NOSB
8 can make a motion to remove that substance
9 from the National List.

10 And then finally, after NOSB votes
11 on any proposal to remove substances, the NOSB
12 discusses the overall review of the substances
13 under their consideration. That's what we
14 could be doing, Madam Chair, at this meeting.
15 The subcommittees could have brought -- if
16 there was a substantive motion, could have
17 brought that review -- I'm sorry. If there
18 was not a need for a motion to review or a
19 motion to remove, the subcommittee could have
20 brought the discussion of the subcommittee to
21 this Board for overall review and your
22 sign-off. That was not done.

1 At the conclusion of this
2 discussion the NOSB Chair confirms that the
3 NOSB review is complete. The NOSB Chair
4 compiles the preliminary reviews from each
5 subcommittee and any NOSB recommendations for
6 removal into a comprehensive NOSB review
7 document.

8 So again, regardless of how we
9 feel about sunset, we need a process. This
10 Board desperately needs a process that the
11 public can rely on that's meaningful, that's
12 reasonable, that's fair and that represents
13 the true intent of the work of the
14 subcommittees. That's what we're seeking
15 here.

16 And I think that in sending this
17 back to the subcommittee what we're saying to
18 the public is whether we agree with what the
19 AMS did with the changes in policy, both as it
20 affected the procedures, the transparency, as
21 well as the substance of the changes, that we
22 are notifying the public that we have a

1 process in place. We're not operating on an
2 ad hoc basis. And it's critical that we stick
3 to a process. If we want to change that
4 process, we need to go through proper channels
5 to change that process.

6 And so we have what we have at
7 this point and I believe that we have not
8 followed that process and we have not carried
9 out the intent based on a required
10 justification of the motion, in this case an
11 essentiality justification to move this as a
12 motion to remove to the full Board. So with
13 that, I turn it back to you. Thank you.

14 CHAIR RICHARDSON: Thank you for
15 the point of order that you have raised.
16 You've raised some procedural issues. Is it
17 your intention to submit or ask the -- propose
18 a motion to send this back to subcommittee,
19 which would be a subsidiary motion which would
20 require a second?

21 MR. FELDMAN: Well, my initial
22 intent was to elicit input from the rest of

1 the Board to see whether they also believe
2 that this is a violation of the procedures as
3 laid out by the NOP. I could make a motion to
4 return this to subcommittee, if that's your
5 preference, Madam Chair.

6 CHAIR RICHARDSON: I think I'd
7 prefer to have it done based on a motion.

8 MR. FELDMAN: Okay.

9 CHAIR RICHARDSON: I think it
10 makes more sense procedurally.

11 MR. FELDMAN: Okay. Well, then I
12 introduce a motion to return the tragacanth
13 motion to the Handling Subcommittee so that
14 procedures as outlined in the Federal Register
15 September 16th, 2013 can be followed.

16 CHAIR RICHARDSON: I'd like a
17 second to that motion in order to be able to
18 discuss this in the detail that it perhaps
19 needs to be discussed. Is there a second to
20 Jay's motion? Is that a second?

21 MR. MARAVELL: I am willing to
22 second Jay's motion, however; I'm not a

1 parliamentarian, I do think we need to be
2 careful here in how we proceed. And you may
3 want to ask for some other comments on how
4 we're proceeding, Madam Chair. But, yes, I am
5 willing to second Jay's motion. I think it
6 has merit for us to consider.

7 CHAIR RICHARDSON: Zea?

8 MS. SONNABEND: Before we proceed
9 with discussion I would like clarification
10 from Miles and the department. Is there time
11 to send this back to committee and bring it
12 back at the next meeting without having it go
13 off the List, if that's what we choose to do?

14 MR. McEVOY: Yes, I believe for
15 this particular material the sunset date is --

16 DR. BRINES: December of 2015.

17 MR. McEVOY: -- December of 2015.
18 So if the NOSB does not complete the review by
19 the sunset date, the material sunsets, is no
20 longer valid, can no longer be used. So
21 that's just a point of clarification. On this
22 slide here materials do not remain on the

1 National List if the NOSB does not complete
2 the review.

3 If the sunset date is December of
4 2015 and the NOSB does not recommend removal,
5 then it is feasible for us to complete a
6 Federal Register notice to renew the listing
7 of -- what is this called again, tragacanth
8 gum by December of 2015. So that would be a
9 feasible time frame. For us to complete
10 rulemaking to remove tragacanth gum from the
11 National List is not feasible for us to do
12 between April and December.

13 CHAIR RICHARDSON: Thank you,
14 Miles. It is my understanding that in
15 bringing up this point of order and the motion
16 is that it is the desire of Jay to allow this
17 to be an opportunity for those -- all members
18 of the NOSB to express their concerns or
19 support of, whatever it might be, of the
20 procedural situation with regards the sunset
21 process. So it's an opportunity for us to
22 have an open discussion. It is the first time

1 we've really done this. It's been September
2 2013 when this first came in.

3 The NOSB has not taken a position
4 on it and we probably won't do so, but it does
5 give us the opportunity to say how is this
6 process working compared with the other one?
7 Does it need clarification? Is it clear the
8 way it is? How do you think that the work
9 that we've been doing is fitting in with the
10 intent of the new or the old sunset procedure?

11 Harold?

12 MR. AUSTIN: So we are now in the
13 discussion period. Okay. I would like to
14 clarify though the point that Jay had raised
15 that we did not follow procedure on the
16 Handling Subcommittee. I will take that, and
17 I choose to argue that point.

18 If you look at the motion that --
19 the paperwork that was posted for public
20 commentary and submitted by the Handling
21 Subcommittee, the motion to remove, I read the
22 intended motion to remove tragacanth gum, but

1 if you go into the declaration above that, the
2 motion to remove, this proposal to remove will
3 be considered by the NOSB at its public
4 meeting.

5 Based on the subcommittee's
6 review, the subcommittee proposes removal of
7 this substance from the National List based on
8 the following criteria in the Organic Foods
9 Production Act, OFPA, 7 USC 6158(m)(6). The
10 alternatives to using this substance in terms
11 of practice or other available materials.
12 Also (7), its compatibility with system of
13 sustainable agriculture. So we did follow
14 procedure.

15 CHAIR RICHARDSON: Nick?

16 MR. MARAVELL: Again, Madam Chair,
17 I'm not a parliamentarian, but I get a little
18 confused. I applaud the Handling Committee
19 for bringing this to the full Board for
20 consideration. If I were a member of the
21 public and I see a motion made to remove --
22 and I'm going to use layman's language here,

1 so don't hold me to strict legal
2 interpretations. If I were going to make a
3 motion to remove an item from the National
4 List and then get a second for that motion,
5 and then I vote against it, my second votes
6 against it, it's sort of like tripping over
7 myself. As I say, I'm not a parliamentarian,
8 but that would immediately send up a red flag
9 as just to how this procedure is working.

10 What we're trying to achieve here
11 is something that makes sense. And Harold is
12 trying to do his job. I'm not criticizing
13 what the Handling Committee intends to do.
14 I'm just saying that the procedure needs to be
15 clear so that we don't get caught in this sort
16 of diabolical loop over and over again.

17 So I respectfully submit that it's
18 hard to consider a motion that the maker and
19 the second both voted against. And so I'm
20 having a hard time perceiving as a member of
21 the public and even as a member of the Board
22 clearly what we're doing here.

1 CHAIR RICHARDSON: So is the sense
2 then the NOSB doesn't want to have a motion on
3 the floor? Just withdraw it? Is that what
4 you want to do? Jay? Nick? Instead all the
5 discussion then will be around the main
6 motion? Is that correct, Jay?

7 MR. FELDMAN: Well, the point of
8 all of this is that the main motion has not
9 followed procedure, because, yes, I understand
10 that the two criterion have been cited. Both
11 essentiality and compatibility have been
12 cited. And maybe the Program can clarify
13 this, but as I understand it the instructions
14 to the subcommittee is that the subcommittee
15 has obtained new information since its last
16 review that supports a motion to remove a
17 substance from the National List. The
18 subcommittee will provide justification that
19 demonstrates -- those are very specific words
20 -- justification that demonstrates that the
21 substance is meeting one of the criteria.

22 Look, I agree with the sentiment

1 here that the full Board should have an
2 opportunity to vote on everything that comes
3 before a subcommittee. I agree with that
4 sentiment 100 percent. Unfortunately, the
5 policy in the Federal Register does not
6 establish a process that does that. It says;
7 and Nick has pointed out, that the maker of
8 the motion voted against the motion. So the
9 intent was not a substantive intent. It was
10 a procedural intent.

11 And I agree with Nick. This isn't
12 a problem that the subcommittee created. The
13 subcommittee was looking for a work-around to
14 give the Board a full opportunity to engage in
15 the discussion and issue a vote. But if we
16 operate on an ad hoc basis like that and seek
17 to circumvent -- first of all, we saw confused
18 members of the public who were coming forward
19 thinking that materials were going to go away.
20 And second of all, it doesn't follow the
21 procedures as outlined in the Federal
22 Register.

1 The other point that many of us
2 have made is that all of this could have been
3 averted if we had had a public discussion on
4 this and some of these procedural problems may
5 have come to light. But I don't think we can
6 go forward as a Board that oversees a 35 --
7 well, we don't oversee, but hopefully
8 contributes to the growth of a \$35 billion
9 industry with ad hoc procedures that are
10 changed midstream and don't reflect something
11 the public can rely on. And the Board
12 shouldn't be put in the position to try to
13 circumvent and jerry-rig a procedure on an ad
14 hoc basis.

15 So I think the only way to correct
16 this is to return it to subcommittee, have the
17 committee have its review, issue it as a
18 review without a motion to remove, bring that
19 to the Board at the next Board meeting, at
20 which time the Board will discuss the review,
21 and then have the Board acknowledge the review
22 and the Chair sign off on the review and give

1 that in the compilation to the NOP. I still
2 think there are problems with the procedure,
3 but that's the procedure we have right now.

4 CHAIR RICHARDSON: So just so you
5 understand it, this is a subsidiary motion to
6 send it back to subcommittee. Its purpose is
7 to allow for a conversation of the Board
8 around the issue of sunset. We'll continue
9 this discussion until we think we've had
10 enough and then we'll vote on it and then
11 we'll go to the main motion.

12 Francis?

13 MR. THICKE: Well, I would point
14 out that it's even more confounded in some of
15 the other committees. In the Crops Committee,
16 for example, the vote was four to three on
17 sulfurous acid and I'm quite sure that those
18 four votes for delisting it were not really
19 intending to delist it. And I think that we
20 had people fly all the way from California and
21 Utah and whatever because of that. And so,
22 these kinds of things have ramifications.

1 CHAIR RICHARDSON: Other Board
2 members? You're all very quiet. I know you
3 have opinions.

4 (No audible response)

5 CHAIR RICHARDSON: No? All right.
6 Oh, Nick?

7 MR. MARAVELL: Yes, take my quiet
8 demeanor as confusion. I remain a little bit
9 confused.

10 MR. AUSTIN: Well, in our opening
11 comments this afternoon I think we did discuss
12 that there are some wrinkles within the new
13 process to take and work our way through. I
14 think it does afford us an opportunity for two
15 different times for public commentary/
16 stakeholder input to garner information to
17 make sure that we collectively make the
18 decisions that are in the best interest of our
19 organic community and the stakeholders that it
20 encompasses.

21 This isn't the perfect solution,
22 but I think to stop the process in midstream,

1 to randomly begin to send materials back to
2 the subcommittees for review knowing that
3 especially in the 2015 we will be under
4 somewhat of a tight time frame in order to
5 accomplish this, I don't know if this is
6 necessarily the right process or the right way
7 to achieve the means and the goal that we're
8 all trying to accomplish. I think there's a
9 better way and I just don't think that this is
10 it.

11 CHAIR RICHARDSON: Colehour then
12 Mac.

13 MR. BONDERA: Thank you. I
14 actually agree with what Harold just said in
15 a lot of ways because I think that we're
16 facing starting to do something that I would
17 argue there's more than just a few wrinkles
18 on. I think even to some degree it's been
19 acknowledged that this -- my sense is, and I'm
20 not going to quote dates or times or people,
21 but I think even the NOP has acknowledged this
22 needs some fixing already even after what was

1 put forth in September last year. And I think
2 that we need to start it out right and it
3 needs to be done well and it needs to not be
4 done figuring it out as you go. And I think
5 arbitrary and capricious come to mind in terms
6 of starting out with something that doesn't
7 work and then trying to correct it as we go.

8 I think I get pretty fearful in
9 terms of -- if we've set precedent and start
10 making decisions on this round of sunset, I
11 think we could be in more trouble, because
12 then we may have to be pulling those back
13 because then it's figured out by the NOP or by
14 the AMS that the process followed does not
15 meet requirements.

16 And so, I am fairly concerned that
17 we're in a situation where what can we do to
18 make it go best. And I think I have to say
19 that from my perspective the only thing that
20 we have right now as a body is to look back at
21 the Federal Register notice that was put
22 forth, and if the NOP wants to issue a new

1 Federal Register notice with some corrections
2 or changes -- I don't know how much time that
3 takes or what the process is, but I would say
4 get on it real fast because we can have a
5 corrected thing that we are following right
6 away rather than trying to make things up as
7 we go and then next meeting they're going to
8 change some more.

9 And like was referred to, the
10 public is very confused and I think frankly
11 and honestly -- and I don't know, Jean, if
12 you're going to go around the room and ask,
13 but I think NOSB members are confused in terms
14 of figuring out what all these things mean and
15 how they all work, and I think people have
16 different opinions and thoughts and
17 understandings, and it's concerning to me that
18 we're going to be voting on materials from
19 different places. And that to me does not
20 feel like how we can work together as a team
21 at all. It feels like we're trying to do
22 things -- I guess ad hoc is not wrong, but

1 we're trying to do things in ways that isn't
2 unified and moving together towards solutions.
3 And honestly, from whatever group each of us
4 is representing they're all members of the
5 public and we aren't able to speak for our
6 groups in a coherent manner.

7 So I would argue that we need to
8 get to a foundation place where we're all
9 together, both collaboratively, the NOP and
10 the NOSB, and so we can be communicating it to
11 the public effectively. And I really feel
12 strongly that that's the only way we can
13 positively and functionally move forward.

14 And I think what Harold said is
15 exactly right; and I'll wrap up, because we
16 have to start the sunset process. We can't be
17 starting to take votes on sunset items and
18 then the train keeps changing tracks. That's
19 going to really not work. Thank you.

20 CHAIR RICHARDSON: I have Mac,
21 then John, then Tracy.

22 MR. STONE: So the way I read

1 this, with this motion to remove it takes
2 two-thirds vote to remove, which is a
3 definitive vote, which is in my opinion that
4 -- frankly, I think it should be hard to get
5 stuff on the list and it should be hard to
6 take it off. So I'm okay with that.

7 The confusion around the wording
8 of the recommendation out of the committee is
9 a little confusing of how it -- the review was
10 done, but when the vote coming out of the
11 committee on this one was zero yes and six no,
12 then it's obvious what the intent of the
13 committee had in their discussion. But
14 Francis referenced one in crops that was like
15 four-three. Then it's hard for me not being
16 on the committee to know just what the
17 committee deliberation sort of was trying to
18 say with a deeper dive into the material.

19 So I could see a fix in how the
20 wording of the language of how the review
21 went, not just that the review happened that
22 could help Board members get a handle of what

1 the deliberation was all about. But I'm okay
2 with this make a motion to remove and then
3 vote against in the committee because it's
4 definitive at the Board level.

5 CHAIR RICHARDSON: John?

6 VICE-CHAIR FOSTER: So whether or
7 not there's one wrinkle or a few wrinkles,
8 whatever, my whole experience with everything
9 since OFPA is it's been one wrinkle after
10 another. So that this has wrinkles is nothing
11 new to me. And if this is confusing, then
12 forget the tax code, forget the voting laws,
13 forget all this other stuff we deal with every
14 single day. It's much more confusing than
15 this to me.

16 I'm with Mac on that camp when you
17 have a zero to six or a six to zero vote on
18 anything, clearly the subcommittee is unified
19 regardless of what the motion is. If it's
20 three-three or four-two or whatever, then
21 there's some disagreement amongst the
22 subcommittee regardless of what the motion is.

1 My intent, I was in the camp
2 originally, for those of you keeping track and
3 score; and I know several of you are -- is I
4 was okay with just doing the review. That was
5 fine with me. I wanted to accommodate the
6 very clear desire by the majority of the Board
7 to make sure we had a vote on every material
8 all the time. And if this is the vehicle we
9 have right now to do that, I'm fine with that
10 because it serves in my opinion a higher
11 purpose, which is establishing a vote
12 opportunity for every Board member. That was
13 my intent.

14 If the motion has to be worded in
15 an odd way, maybe it's -- I don't know, maybe
16 it's me being a literature major coming out to
17 haunt me again, but I'm okay with that. Like
18 craft the words to make them do what you need
19 to get done. So I'm not particularly
20 confused. I think I've been pretty clear
21 here. I'll stop there.

22 CHAIR RICHARDSON: Before I go to

1 Tracy, just to remind you that the motion on
2 the floor is to send it back to subcommittee.
3 It's a seconded motion, and that motion is
4 necessary because Jay objected to procedure,
5 raised a point of order which is not
6 debatable. So we need to have a motion on the
7 floor to have this debate. So therefore, the
8 debate is whether or not to send this material
9 back to subcommittee based on procedural mess.

10 MR. THICKE: Clarification. Does
11 that mean that all the materials will go back
12 to subcommittee since they're all under the
13 same --

14 (Simultaneous speech)

15 CHAIR RICHARDSON: No, we're just
16 dealing with this one right now. Let's just
17 take one thing at a time.

18 MR. THICKE: We need to think
19 ahead.

20 (Laughter)

21 CHAIR RICHARDSON: Tracy?

22 MS. FAVRE: Thank you. I would

1 agree with what Mac and John have said. I
2 think any of us that were sitting in on the
3 Handling calls and had participated in the
4 conversation know that the statement that is
5 at the end of each of the materials review
6 made it clear what our intent was.

7 I can't speak for the Crops
8 Committee because I think there were some
9 people that were more concerned with process,
10 making sure the process was correct. I guess
11 maybe it's just the engineer in me that wants
12 to get the work done in addition to process.
13 I feel like putting the statement in there
14 that expressed our intent to give the
15 opportunity for everybody to vote was very
16 clear. Our vote then was indicative of our
17 intent on the motion itself. And we were very
18 clear on the Handling Committee what we were
19 doing and what we hoped to express.

20 I think John made some very good
21 points about it doesn't really matter what the
22 vote is because there might be disagreements.

1 I think we did a very good job in the Handling
2 Committee reaching consensus as a group, what
3 was the best way to express the wishes to get
4 everybody a chance to vote. I think that was
5 less clear in Crops because again maybe some
6 philosophical differences about wanting to
7 correct the process regardless of its impact
8 on the particular materials reviews.

9 And I think again in the very big
10 picture most of us felt very strongly that we
11 wanted to have a chance on the record to vote
12 on the material and if we did need to craft a
13 motion that felt a little awkward -- anybody
14 that read the proposals and saw the vote could
15 pretty easily work out what the intent was in
16 Handling. So I think that was pretty clear.
17 I don't think there was any confusion.

18 And I stand behind the comment
19 that if we bring a motion forward and there is
20 a vote from the subcommittee, regardless --
21 Jay, you'd expressed that there might be some
22 concerns and people were confused that might

1 have flown here in alarm that a material might
2 be reviewed or removed. That's the risk on
3 any of these materials that undergo potential
4 for a sunset.

5 CHAIR RICHARDSON: Harold?

6 MR. AUSTIN: Well, just to follow
7 up on what Tracy had said, I also sit on the
8 Crops Committee, and having sat on that and
9 chairing the Handling Committee, we had the
10 dialogue amongst ourselves that we needed to
11 make sure that we had clarity and that the
12 motions that came out showed our true intent.
13 And I think this did do that.

14 We also were challenged with the
15 task of how to bring this back out under the
16 current guidelines so that we could have it
17 for a full Board review and vote, and I think
18 we pretty much said that in the highlighted
19 block there. I said it before: This has a
20 few wrinkles. The process potentially is a
21 good process if we allow it the time and we
22 put the energy collectively together to work

1 our way through it. It's going to have some
2 bumps. It's going to have some bruises. We
3 can work our way through it. But to take and
4 move forward with the motion that we currently
5 have before us is not the way to do it.

6 We talk about clarity. We talk
7 about substance. We talk about doing
8 something so that everybody understands it.
9 Taking the current motion, referring it back
10 to the subcommittee is only going to do
11 nothing more than add more gray clouds, more
12 confusing information back. And I think it is
13 going to make it more troublesome. And I
14 don't think that's the way we should proceed.
15 Let's give this due process a try and see what
16 we can make of it.

17 CHAIR RICHARDSON: Colehour?

18 MR. BONDERA: Thank you, Madam
19 Chair. I appreciate a lot going on. So I
20 guess I just -- following I guess what John
21 and Tracy said, and I guess Harold, too, now,
22 I think my feelings come down to -- I mean,

1 one way, it's not the only way, but I think I
2 said this probably -- I don't know the last
3 time I said it, but I've said it before, I
4 really think that we all need to be working
5 together.

6 And I think you guys all just
7 pointed out very clearly one of the issues at
8 hand is, well, there's a different process
9 happening in Handling based, like Harold just
10 referred to, how it was going in Crops and
11 these are different. And I think that that's
12 sort of for me the linchpin in terms of we all
13 need to be following the same process and
14 using the same process and not arbitrarily,
15 depending on who was appointed chair of which
16 subcommittee at which moment -- and I'm
17 talking not right now who's chair of which
18 ones, but three years from now or whenever,
19 they could come up with whatever they want to
20 come up with or that feels good at that moment
21 that is just created.

22 We don't have -- yes, we could

1 say, well, the PDS should come up with some
2 new policy and maybe the NOP will approve
3 that, etcetera, etcetera. That's all
4 hypothetical. We don't have a process that
5 we're all following equivalently to reach
6 these conclusions whether or not -- like John
7 said, it's we all vote, or it's just done by
8 review, or whatever it is. There isn't one in
9 place that we're all making use of equally.
10 And that's for me where I think we have to
11 start is on an equal level playing field so
12 we're all pursuing things, not with the same
13 conclusions, not with the same votes,
14 etcetera, but we're all using the same
15 process, because otherwise, it doesn't feel
16 fair and even to me.

17 CHAIR RICHARDSON: Other comments?
18 Mac?

19 MR. STONE: So in looking through
20 the Crops recommendations, as well as the
21 Handling, because it's new, the wording could
22 be a little more verbose, John, robust, but it

1 is clear and they are consistent that motion
2 to remove, something that we sort of decided
3 as a group to get it in front of the full
4 Board that it is clear. No matter what the
5 vote is, you can see some deliberations at the
6 committee level. When it's four-three, well,
7 there's mixed feelings about whether we move
8 it or not, and we can have that conversation.
9 So I'm perfectly comfortable with what both
10 committees have put forward at this point.

11 CHAIR RICHARDSON: Zea?

12 MS. SONNABEND: Thank you. Well,
13 I've been thinking about this a lot and I
14 decided to write my statement so that I could
15 get through it properly, which is more a
16 statement of my feelings than it is about
17 procedure exactly, but that's what I'm going
18 to do is read my statement.

19 I was appointed to fulfill my NOSB
20 responsibilities under rules that we did not
21 make ourselves. Those responsibilities are to
22 review materials in whatever way the NOP has

1 determined is the procedure for this. My time
2 is best spent in fulfilling these
3 responsibilities and working within the
4 existing rules to make sure there is a good
5 opportunity for gathering public input and
6 seeking information on the materials in front
7 us while trying to keep our process
8 transparent and accessible. I spend many
9 hours a week doing this on my responsibilities
10 here.

11 I feel that I'm now being
12 distracted and sometimes obstructed from doing
13 my job by those of you who are upset with the
14 politics of this and wish to take up our time
15 both from within and without of the Board by
16 clouding the work on this issue. I do not
17 really trust that my colleagues on the Board
18 are capable of defining those procedures
19 properly instead of the NOP and I think that
20 some of them may possibly have ulterior
21 motives to remove everything from the list or
22 to bog us down because they don't like the

1 political changes or because we didn't follow
2 the procedures. Therefore, I feel that the
3 NOP should be instructing us with what the
4 procedures we are to follow in this.

5 What I keep thinking about is what
6 if as each dusk comes and the sun is about to
7 go down and we have to vote for whether it's
8 going to come up in the morning?

9 (Laughter)

10 MS. SONNABEND: If we fail to get
11 the two-thirds majority, the sun will not rise
12 and it is the end of the world.

13 (Laughter)

14 MS. SONNABEND: Our confidence
15 that the sun can still come up tomorrow is
16 similar to our hope that organic can work
17 within the system that is laid out for us in
18 the rules. It is not incumbent on us to make
19 these changes, as one commenter said. So I
20 think we need to leave the politics to the
21 politicians and enable us to do our jobs.
22 Thank you.

1 (Applause)

2 CHAIR RICHARDSON: Jay, did you
3 have a comment?

4 MR. FELDMAN: You know, when we
5 created this process we thought we were
6 creating a democratic process. We've learned
7 since September 16th that this isn't a
8 democratic process. We had collaboration
9 built into the procedures. Not everybody has
10 grown up in a part of society where they can
11 trust that they have access to people in
12 positions of power and can have meetings and
13 closed doors, change policies overnight,
14 rewrite them. Not everybody is on the
15 positive end of the receiving of those types
16 of power relationships that undermine process,
17 which is intended to protect all of us rather
18 than some of us.

19 We were handed a procedure and the
20 procedure says very clearly; we still haven't
21 heard from the Program, that the subcommittee
22 will provide justification that demonstrates

1 that the substance is either harmful to human
2 health, unnecessary because of unavailability
3 or availability and inconsistent with organic
4 production or handling.

5 You know, engineers are not just
6 concerned with the outcome. They're concerned
7 with the process. And I went to planning
8 school where we talked about participatory
9 planning because the planners figured out that
10 if a bunch of experts got in a room without
11 engaging the people they were building for,
12 designing for, spaces, communities, buildings,
13 societies, transportation systems, that those
14 systems failed, and they failed badly. And
15 then we began rebuilding those systems. So I
16 learned from a lot of people that experienced
17 a lot of failures in process and in outcomes
18 that the process is almost always as important
19 as the outcome and the process enhances the
20 outcome, protects the outcome.

21 And so when we were handed this
22 new policy, we looked at it from a legal

1 standpoint and we asked ourselves do we
2 believe this is in compliance with the
3 statute? But we also asked ourselves what do
4 we need to do to comply with the policies as
5 they had been presented to us?

6 And it hurt me as a member of this
7 Board to find out that members were meeting,
8 not as full Committee members, but meeting to
9 create the process that had been handed to us
10 in the Federal Register and that it was being
11 reconstructed, and that I didn't hear a word
12 from the National Organic Program which had
13 gone to great lengths to bring the whole Board
14 in, to train the Board on the new procedures
15 and present this language to us: "If the
16 subcommittee has obtained new information
17 since its last review that supports a motion
18 to remove a substance from the National List,
19 the subcommittee will provide justification
20 that demonstrates."

21 And that was explained to us as
22 justification that requires some review, some

1 attempt at collecting information through TRs,
2 through certifiers, through all the
3 information points that can provide the
4 information for us to make decisions that can
5 stand up to what the public expects, that
6 maintain the public trust in the label.

7 Madam Chair, the most confusing
8 part of this conversation for me is that we
9 have procedures and often over my history on
10 this Board we've referred to those procedures
11 constantly, about how we must honor the
12 previous boards, we must honor the process, we
13 must honor the authority of the AMS and the
14 USDA. And the Board has always done that
15 until now where the Board has said we want to
16 change the process. And the NOP appears to be
17 sitting by and allowing that to happen even
18 though it doesn't allow it to happen in other
19 contexts.

20 If that doesn't define arbitrary
21 and capricious and define a process that, I
22 think -- Zea, I think really does undermine

1 the value of all the good work you do to bring
2 science to this process. If we can't stand
3 behind a process that is understandable,
4 consistent and clear, then all that good
5 science will be distrusted.

6 So I would like to hear from the
7 Program on this. What is meant by
8 "justification that demonstrates?" Because I
9 took that to heart. And I believe in our
10 subcommittee, if you look -- Mac, if you look
11 in the Crops documents --

12 CHAIR RICHARDSON: Just remember
13 you're addressing comments to the Chair.

14 MR. FELDMAN: Okay. Madam Chair,
15 if you look in the Crops documents versus the
16 Handling documents, you'll see an attempt to
17 do checklists, to come up with the science to
18 either justify or not justify that the
19 criteria, the OFPA criteria are met. That's
20 our job as Board members. We signed up to do
21 that and I don't want to go off this Board
22 letting this rest on the notion that this is

1 a little wrinkle and we should just ignore it
2 because we want to get to the outcome that we
3 want to get to.

4 CHAIR RICHARDSON: Let me clarify
5 where we are.

6 (Applause)

7 CHAIR RICHARDSON: Let me clarify
8 where we are. There was a main motion brought
9 from the subcommittee to remove tragacanth
10 gum. Jay raised a point of order, a
11 procedural order, which is not a debatable
12 motion. It's just a point of order which the
13 Chair could rule on. I determined not to rule
14 on that, but invited a motion to send back to
15 subcommittee. This is a subsidiary motion
16 which we are presently debating so that the
17 motion on the floor under debate is a motion
18 to send this material back to subcommittee
19 based on procedural issues coming out of the
20 new sunset procedure.

21 Are you ready to vote on that?

22 (No audible response)

1 CHAIR RICHARDSON: No? Okay.

2 Colehour and then Nick.

3 MR. BONDERA: Yes, I'm not ready
4 to vote on it in part along the lines of what
5 Jay just brought up. I would like to hear
6 from the Program what is going to happen if
7 these get sent back to subcommittee in terms
8 of like we've been discussing? Is something
9 going to change or four or six months from now
10 are they just going to come back the same?
11 Because if the Program isn't committed to make
12 some changes in this process, then I don't see
13 some value. So I think in my opinion we need
14 to hear from the Program before we vote on
15 this motion. Thank you.

16 MR. McEVOY: Okay. Well, we
17 started this in September of 2013 with the
18 revision to the sunset process and we
19 clarified that there's two parts to that
20 process, and that is that the NOSB has to
21 complete the review of all the sunset
22 materials every five years. After that review

1 is complete then the Secretary can then
2 potentially renew those substances on the
3 National List. If those things don't occur,
4 then those substances sunset or become invalid
5 and can no longer be used.

6 So within that Federal Register
7 notice we provided that the full Board is the
8 only one that makes these determinations. The
9 subcommittees -- with all the work that the
10 NOSB does, the subcommittees have a role to
11 play. Their role is to look at particular
12 issues, whether they're petitions or sunset
13 materials or other agenda items that the Board
14 is working on and focus on those and bring
15 proposals, bring their information, discussion
16 documents, a variety of different things to
17 the full Board. It's only the full Board that
18 makes those final determinations, those final
19 recommendations. So it's the full Board that
20 completes the review of those substances.

21 As we said in the September 2013
22 notice, that completion of the review by this

1 body, by the National Organic Standards Board,
2 does not require a vote and NOSB does not --
3 OFPA does not require a vote, but it does
4 require the Board to complete their review.

5 We heard from the public and we
6 heard from the Board members that you all
7 wanted to have a vote for these substances, so
8 we accommodated that under the provisions of
9 the September 2013 Federal Register notice and
10 we clarified that in a memo to the Board just
11 a few weeks ago which specifically states,
12 "The Organic Foods Production Act of 1990
13 requires that the National Organic Standards
14 Board, a 15-member federal advisory committee,
15 review all substances and the Secretary of
16 Agriculture renew these substances within five
17 year of their addition to or renewal on the
18 National List. This action of NOSB review and
19 USDA renewal is commonly referred to as the
20 sunset process.

21 "Since the publication of the
22 sunset process notice in the Federal Register

1 on September 16th, 2013 the Agricultural
2 Marketing Service has received feedback from
3 the public and the NOSB concerning the role of
4 the subcommittees in the sunset review
5 process. AMS has received requests to clarify
6 that the NOSB completes the sunset review, not
7 the subcommittees. AMS is reiterating that
8 the NOSB is responsible for reviewing all
9 substances under the sunset process.

10 "The NOSB will complete its 2015
11 sunset review process for seven substances at
12 the October 2014 public meeting. The NOSB
13 Crops Subcommittee has conducted a preliminary
14 review of three substances and includes a
15 motion to remove for each substance. The NOSB
16 Handling Subcommittee has conducted a
17 preliminary review of four handling substances
18 and included a motion to remove for each
19 substance.

20 "During the October 2014 meeting
21 the NOSB will conduct a vote to remove for
22 each substance that is under 2015 sunset

1 review. Whether the motions to remove pass or
2 fail, the completion of the vote by the NOSB
3 concludes the review process for each
4 substance. A failed motion on a substance
5 indicates that the NOSB determined a substance
6 continues to meet OFPA criteria and AMS may
7 publish a Federal Register notice announcing
8 that the listing will be renewed for five
9 years.

10 "A passed motion on a substance
11 indicates that the NOSB determined a substance
12 no longer meets the OFPA criteria and the NOSB
13 will make a recommendation to AMS for removal
14 of the substance. AMS will review the
15 recommendation and determine whether to
16 proceed with rulemaking to remove the
17 substance from the National List.

18 "The NOSB plays a critical role in
19 reviewing substances to ensure that all
20 substances on the National List meet the
21 criteria specified in the Organic Foods
22 Production Act and AMS thanks the NOSB for its

1 critical work on the National List."

2 So I read that because I think
3 it's important to go back to what we said
4 about this, that the work that you're doing
5 here is -- the vote that you would take on
6 these motions is in complete alignment with
7 the procedures that were outlined in the
8 September 16th, 2013 Federal Register notice.

9 CHAIR RICHARDSON: Nick?

10 MR. MARAVELL: Yes, Miles, so I
11 just want to emphasize what was in that memo
12 and what you just said, which is that the
13 procedures from September 2013 are now further
14 explained in your memo so that a vote of the
15 full Board completes the review of all sunset
16 materials. Am I correct that that now
17 represents additional information that was not
18 in the September '13 material?

19 MR. McEVOY: Well, it includes
20 additional information. This is specific for
21 this particular meeting, that all the
22 substances up for review have come out of the

1 subcommittees with a motion to remove. So now
2 you have an opportunity to vote on those
3 motions to remove.

4 CHAIR RICHARDSON: I have --

5 MR. MARAVELL: So --

6 CHAIR RICHARDSON: -- Tracy then
7 Zea then Jay.

8 MR. MARAVELL: Can I have a
9 comment?

10 CHAIR RICHARDSON: Oh, I'm sorry,
11 Nick.

12 MR. MARAVELL: So that going
13 forward my concern remains we not get caught
14 in this over and over again. So you're saying
15 you would have to issue another memorandum
16 prior to the next meeting to clarify this same
17 situation?

18 MR. McEVOY: The plan is to work
19 with the Policy Development Subcommittee on
20 clarifying these aspects of the process. So
21 that is a common part of this wonderful
22 process is that there's always ways to provide

1 additional clarification or procedures that
2 meet the needs of the community.

3 MR. MARAVELL: So the September 13
4 guidance, or procedure can have additional
5 material added to it which might reflect how
6 we are -- which might reflect how we are
7 proceeding now?

8 MR. McEVOY: Exactly. It's very
9 similar to what has happened with previous
10 Federal Register notices on sunset or the
11 petition process where the particular
12 procedures are outlined in those Federal
13 Register notices, and then the National
14 Organic Standards Board through their Policy
15 Development Subcommittee provides additional
16 guidance or clarification on how those
17 particular elements are going to further
18 implemented. So it's a process that has
19 occurred over and over again.

20 CHAIR RICHARDSON: Tracy then Zea.

21 MS. FAVRE: Thank you, Miles, for
22 that clarification and that additional

1 information for our discussion.

2 Colehour, to your point about
3 wanting to come up with a process that gives
4 us clarity going forward, I actually am in
5 support of that, too. I think generally
6 philosophically I agree with Jay, I agree with
7 Colehour in that we have to have a process
8 that everybody is consistent on.

9 I think the difference that I see
10 is that we're on a moving train. We don't
11 have the luxury given the timeline for the
12 sunset to stop everything, put everything on
13 hold until we reach a perfect solution. So I
14 feel as though we came up with some interim
15 solutions, meaning temporary and to a specific
16 point to get some forward progress while we
17 work out the details.

18 The fact that the Policy
19 Development Subcommittee is going to have an
20 opportunity to work with the Program on this
21 I think is indicative of the spirit of
22 collaboration that we want to see going

1 forward and that we will have some input and
2 opportunity to help polish this new procedure
3 as we go forward.

4 And I would like to remind
5 everybody that failure to move on these
6 materials leaves further uncertainty in the
7 community and the industry. We've had
8 multiple comments here over the last two days
9 urging us to not let procedural shenanigans,
10 for lack of a better word, halt our forward
11 progress and that there is real impact and
12 hardship by our failure to make decisions as
13 we move forward.

14 So while, Jay, I appreciate your
15 comments and I respect your position on that,
16 I do feel like this is an opportunity for us
17 to move forward at the same time recognizing
18 that there's additional things we can do to
19 make the process better.

20 CHAIR RICHARDSON: Zea and then
21 Jay.

22 MS. SONNABEND: It's a question

1 for Miles. The thing that isn't clear to me
2 is what statement or action we could do at a
3 future meeting or at this meeting if we were
4 to withdraw a motion to remove that would be
5 definitive that we had completed the review of
6 the material in a way that that would stand up
7 to public scrutiny and possible legal
8 challenge.

9 MR. McEVOY: I'm not sure what the
10 question is.

11 MS. SONNABEND: Well, it's very
12 convoluted this motion to remove thing when we
13 it's not really our intent to remove
14 something. And so, I would much rather -- I
15 think most of us agree that the full Board
16 should review something, but you're saying the
17 only way the full Board can be on record is by
18 this motion to remove. So I'm asking if the
19 full Board can complete the review and what
20 that would look like in the transcripts to
21 complete a review without a motion to remove.

22 MR. McEVOY: Yes, you could --

1 when you're done, you're -- for instance, this
2 is not happening this time because there's a
3 motion to remove for all the substances. If
4 the subcommittee had not brought forward a
5 motion to remove and then there was a
6 discussion with the whole Board about that
7 particular substance and that discussion
8 ended, then the review of that substance would
9 be complete.

10 So what we've heard is that
11 there's sort of that feeling of lack of
12 closure potentially if there's not a vote, so
13 therefore that's why a lot of people wanted to
14 see a vote on these substances, and that's
15 what's happening at this particular meeting is
16 there's a motion to remove on all those
17 various substances.

18 And I would also just point out
19 that there are many motions that are brought
20 forward to the NOSB for consideration that the
21 motioner and the seconder do not vote for the
22 motion. Many of the petitions that are

1 motions to add something to the National List,
2 the motioner may vote against that, but they
3 still need to bring that to the table so that
4 there can be a vote on that particular topic.

5 CHAIR RICHARDSON: Jay?

6 MR. FELDMAN: I don't want to beat
7 a dead horse. I just want to maybe say you
8 can choose to answer this or not at this
9 point. I would like to get clarification on
10 what the Program meant when it told the
11 subcommittee that it should provide
12 justification that demonstrates that the
13 substance meets one of the OFPA criteria.

14 I took that seriously when I saw
15 it and I want about developing a checklist
16 with the justifications and the demonstrations
17 in accordance with the rules. If it means
18 something less than that or something more
19 than that, I think the Board should know that
20 because that has always been central to our
21 process. I mean, I don't think I'm saying
22 anything new here, but I don't feel that your

1 reading of the October 8th memo answered that
2 question. What it did was that it told the
3 public that the NOSB had advanced through the
4 subcommittee process motions to remove and
5 therefore there would be a full vote. It
6 didn't answer the question as to whether the
7 subcommittee followed the procedures in the
8 Federal Register that it shall and must
9 justify and demonstrate that the substance
10 meets or fails OFPA criteria. That's a very
11 simple question. But I recognize I may not
12 get an answer, so I don't want to belabor my
13 point.

14 CHAIR RICHARDSON: Miles?

15 MR. McEVOY: Well, I would say the
16 subcommittees absolutely followed the
17 procedures and the procedures are being
18 followed by the motions that they brought
19 forward.

20 What we want to ensure is that the
21 focus is on those criteria that are in OFPA,
22 that that should be the consideration by the

1 Board for any additions. Removals or changes
2 to listings on the National List should be
3 based on the Organic Foods Production Act.
4 But the subcommittees certainly followed
5 procedure.

6 CHAIR RICHARDSON: Okay. Are we
7 ready for the question? There is a -- Nick?

8 MR. MARAVELL: Yes, having
9 seconded the motion I'd like to make some of
10 my intent clear and make an observation.

11 We certainly do not want to create
12 any disruption in the field for any of the
13 handlers in this case. This is a handling
14 provision. And so, I think the field can rest
15 assured that that will not be an outcome of
16 what we're doing here. It's not anyone's
17 intent.

18 My simple observation is that,
19 yes, I agree with John, having been associated
20 with OFPA before 1990 and going forward, that
21 there have been always been wrinkles every
22 step of the way. Unfortunately, those

1 wrinkles have very often come about because
2 the Agency, USDA, did not take the full intent
3 and the letter of the statute to heart.

4 That's only been in certain cases where the
5 wrinkles have come from, but there have been
6 those wrinkles.

7 And so as a representative of
8 farmers who are fond of saying if it ain't
9 broke, don't fix it, we have sort of found
10 ourselves in another quandary here. We will
11 work this out. This will go forward. We will
12 be in compliance with the statute. I know the
13 agency wants to do that. And so, I think
14 everyone can rest assured that this will be an
15 iterative process. Okay. We're trying it in
16 2015. We will go forward and we will make
17 this work, but there will be unfortunately
18 some wrinkles, some new wrinkles, some of
19 which are of our own creation.

20 And I'm seriously sorry if this
21 disrupts any member of the organic community.
22 This is really sort of an internal thing here,

1 and so we will try to minimize any impact that
2 that has on people's commerce. Thank you.

3 CHAIR RICHARDSON: Are we ready
4 for the question on the subsidiary motion?

5 (No audible response)

6 CHAIR RICHARDSON: I believe that
7 we are. There is a motion on the floor
8 arising out of a procedural question and a
9 rule to the Chair, request to the Chair, point
10 of order to the Chair, which is now in the
11 form of a subsidiary motion to send tragacanth
12 gum back to the subcommittee. The motion was
13 made by Jay, seconded by Nick. I think this
14 has been a good discussion and very glad to
15 have it. And I believe we're ready for the
16 question. And I think I start with Tracy. Do
17 I start with you? Yes.

18 MS. FAVRE: Just to clarify we're
19 voting on the motion to send it back to
20 committee?

21 CHAIR RICHARDSON: Right. A yes
22 vote would send it back to subcommittee. A no

1 vote will take us simply back to the main
2 motion.

3 MS. FAVRE: So, no.

4 MR. DICKSON: No.

5 VICE-CHAIR FOSTER: No.

6 MR. STONE: No, ma'am. And we're
7 not in a hurry here.

8 MR. FELDMAN: Yes.

9 MR. AUSTIN: No.

10 MS. FULWIDER: No.

11 MS. SONNABEND: No.

12 DR. WALKER: Yes.

13 MR. MARAVELL: Yes.

14 MR. BONDERA: Yes.

15 DR. TAYLOR: Yes.

16 MR. THICKE: Yes.

17 MS. BECK: No.

18 CHAIR RICHARDSON: No.

19 MR. STONE: I get nine yes, six
20 no.

21 (Laughter)

22 MR. STONE: Correct. Nine no --

1 CHAIR RICHARDSON: He's from
2 Kentucky. He can't count.

3 MR. STONE: Nine no, six yes.
4 Excuse me.

5 CHAIR RICHARDSON: The motion
6 fails. We will now move to the main motion.
7 The main motion on the floor is a motion to
8 remove tragacanth gum from the National List.

9 MR. MARAVELL: Madam Chair, just a
10 point of order. Do we need to withdraw the
11 original point of order or not? Do we need to
12 withdraw Jay's original point of order before
13 we proceed? So there's --

14 CHAIR RICHARDSON: No.

15 MR. MARAVELL: -- he made a point
16 of order and there's no ruling and we don't
17 need to withdraw it?

18 CHAIR RICHARDSON: No, because we
19 converted it into a subsidiary motion. So the
20 Chair did not rule on the point of order.

21 MR. MARAVELL: Okay. That's fine.
22 I just want to make sure everybody's clear.

1 CHAIR RICHARDSON: Discussion on
2 the main motion? Harold?

3 MR. AUSTIN: Lisa, have we done
4 your part yet? I've lost track.

5 DR. BRINES: I believe I did.
6 Thank you.

7 MR. AUSTIN: Thank you. I'll turn
8 this over to Joe to handle the discussion for
9 the Handling Subcommittee. Thank you, Joe.

10 MR. DICKSON: And, yes, tragacanth
11 gum. Let me find it here in my notes. And
12 Dr. Brines has already given the introductory
13 piece of this. I couldn't remember,
14 seriously.

15 So as Dr. Brines recounted, the
16 substance was originally reviewed and added to
17 205.606 in May 2008. At the time the
18 petitioner and the committee noted that there
19 were extremely limited growing regions for the
20 plant from which this material is extracted
21 and there was no organic gum in production at
22 that time.

1 We reviewed the material and at
2 the spring meeting encouraged any current
3 users of the material or certifiers of such
4 users to come forward and testify and show us
5 that there was continued demand for this
6 substance. We did not hear from any users
7 until yesterday. One of the certifiers
8 relayed a message from one of her clients.
9 Through the certifier that client submitted a
10 letter to the subcommittee detailing his
11 technical reasons for using this particular
12 gum in a mint product.

13 Based on that information and this
14 narrative of this particular producer who
15 makes a single product that is entirely
16 dependent on this material, I do believe that
17 we have seen a demonstration of continued
18 demand for the use of this gum.

19 MR. AUSTIN: Thank you, Joe.
20 We'll open it up for discussion at this time.
21 Are there any questions, any discussion?

22 CHAIR RICHARDSON: Zea?

1 MS. SONNABEND: I have a question
2 about that letter, if it's appropriate. Is
3 agar on the National List? Because that's
4 what he said his product contained besides
5 gellan gum. I mean, besides tragacanth gum.

6 MR. AUSTIN: Yes, agar is on the
7 List.

8 MS. SONNABEND: Is on the National
9 List.

10 MR. AUSTIN: Yes.

11 MS. SONNABEND: Okay.

12 MR. AUSTIN: We reviewed it when
13 we first got on. I did, yes.

14 MS. SONNABEND: Thank you. Sorry.

15 MR. AUSTIN: I was the lead on it.

16 Is there any further discussion or
17 -- Nick?

18 MR. MARAVELL: Yes, Joe, you said
19 you reviewed this information. Was it written
20 or was it verbal? I mean, we heard it at the
21 podium.

22 MR. AUSTIN: Yes, for

1 clarification I would inform the Board that we
2 were presented with this information earlier
3 today.

4 MR. MARAVELL: Oh.

5 MR. AUSTIN: All of the Board
6 members should have received a copy of it in
7 front of you.

8 MR. MARAVELL: This is the first
9 time I've seen it. It must have missed my
10 seat. Okay. All right. That clarifies it.
11 Thank you.

12 MR. AUSTIN: Zea?

13 MS. SONNABEND: I guess I think
14 this example of getting this letter this
15 morning and not before points out a flaw in
16 starting out a new process like this.
17 Obviously the notice didn't get around to this
18 person in the last comment period and because
19 the system of the new policy is new, I think
20 that might happen to us for the next while.
21 It could have already happened with sherry and
22 marsala. We don't really know.

1 But because of that, while I might
2 not be inclined to vote for this if I had more
3 complete information, I will give it the
4 benefit of the doubt and say that this is
5 probably worth keeping until such time as we
6 can do more thorough investigation in the next
7 round of sunset and the procedures are more
8 clear.

9 MR. AUSTIN: I think for the
10 benefit of the Board and I think for the
11 gallery as well it was the original intent of
12 the subcommittee when we moved this forward,
13 and you can see that -- no, I guess you can't
14 see it with this, but we were leaning towards
15 keeping this on and then as we got into the
16 public comment period, the lack of any
17 comments coming back in had led the
18 subcommittee during our discussions on our
19 calls to begin to lean towards allowing this
20 to move off of the list and technically delist
21 it and allow it to sunset until we heard the
22 commentary yesterday and then this new piece

1 of information provided for us.

2 So originally we were going to
3 leave it on and then we heard absolutely
4 nothing until yesterday. In the written
5 comments there was nothing coming until we saw
6 this. So that was kind of our original
7 intent. So I think just for clarity we've
8 kind of moved both sides of the spectrum on
9 this, which I think is really what openness
10 and transparency about this entire process is
11 all about.

12 CHAIR RICHARDSON: Nick?

13 MR. MARAVELL: Madam Chair, just
14 an observation. Again, just if I were a
15 farmer reading the Handling Committee
16 recommendation on this; it reads very similar
17 to the recommendation on gellan gum, I would
18 not know the true intent of the subcommittee.
19 And so this is just an observation.

20 CHAIR RICHARDSON: Other comments?
21 Jay?

22 MR. FELDMAN: Okay. I'm trying to

1 understand what the subcommittee did, so maybe
2 it's obvious to others, but a search of the
3 medical literature shows no new safety
4 information or other medical data related.
5 Does that mean you all did a checklist? What
6 was the process in this review? Madam Chair,
7 I'm trying to get an understanding of whether
8 we're still using checklists, how we're going
9 about doing these reviews.

10 MR. AUSTIN: Joe, you want to
11 clarify that?

12 MR. DICKSON: Yes. Jay, we did
13 not use a checklist in the sunset review of
14 this material. As a subcommittee, with our
15 expertise in various areas, we looked at
16 Medline, we looked at various regulatory
17 documents, we conducted a review of this
18 material without the use of a formal
19 checklist.

20 MR. AUSTIN: I would point out
21 that during this process that the use of a
22 checklist is voluntary. I mean, it's not

1 mandatory that we use one.

2 Any further discussion? Nick?

3 MR. MARAVELL: Yes, I'm a slow
4 reader. I tend to agree with Zea. I mean,
5 I'm inclined to go ahead and approve this, but
6 I think that -- Excuse me?

7 CHAIR RICHARDSON: Speak up.

8 MR. MARAVELL: Oh, I'm sorry. I
9 agree with Zea. I'm inclined to approve this,
10 however, I think the circumstances -- we
11 really haven't had a chance to digest this
12 material. I understand his specific
13 predicament and that very much moves me, but
14 we also have to make sure that we've reviewed
15 this and we feel comfortable with it. And I
16 just want to make another observation. I just
17 barely feel comfortable with it, but hopefully
18 we will have prevented at least one person's
19 catastrophe.

20 CHAIR RICHARDSON: Are we ready
21 for the question? Oh, sorry, Colehour.

22 MR. BONDERA: I actually feel

1 similar to what Nick just expressed and I
2 would request or suggest that this vote get
3 deferred at least until tomorrow so that
4 there's some chance to have a look at this
5 document that was just stuck on our table, at
6 a minimum.

7 MR. AUSTIN: I think that's a fair
8 request. Madam Chair?

9 CHAIR RICHARDSON: That we table
10 this until tomorrow at a set time? Is that
11 the general will of NOSB, that we wait to vote
12 on this until tomorrow?

13 (No audible response)

14 CHAIR RICHARDSON: Is there anyone
15 that would object to us moving this until
16 tomorrow at a set time, which will be more or
17 less sometime in the afternoon.

18 MR. AUSTIN: I think that would
19 afford the entire Board the opportunity to
20 read the new information.

21 CHAIR RICHARDSON: Okay. Good.
22 Seeing no objection to this, this material

1 will be considered, taken up tomorrow for the
2 vote. So we move onto the next material?

3 MR. AUSTIN: All right. The last
4 of our 2015 --

5 MS. ROSEN: Point of order, Jean?
6 Excuse me, Madam Chair. Don't you need to
7 remove the motion if you're going to table it,
8 the original motion to remove?

9 CHAIR RICHARDSON: That's an
10 interesting question and I don't have a
11 perfect answer to that. It seems to me it's
12 an active motion that we're tabling until it
13 gets reconsidered tomorrow.

14 MR. AUSTIN: As the chair of the
15 Handling Subcommittee, I will withdraw that
16 motion and -- should we withdraw it?

17 PARTICIPANT: It's active.

18 MR. AUSTIN: It's active? Okay.
19 Well, it's just been tabled until tomorrow
20 then.

21 Okay. All right. Moving on. The
22 last of our 2015 sunset review materials,

1 gellan gum. Lisa?

2 DR. BRINES: Thanks, Harold. The
3 substance gellan gum is currently included on
4 the National List at Section 205.605(a) as a
5 non-synthetic substance. It's listed as gellan
6 gum, CAS No. 71010-52-1 with the annotation
7 "high acyl form only." The substance was
8 originally petitioned in 2004 and added to the
9 list in 2010. And in support of the original
10 review a technical report was developed and is
11 available on the NOP's Web site. Thank you.

12 MR. AUSTIN: Thank you, Lisa. At
13 this point I'd like to turn it over to Joe to
14 handle the presentation for the Handling
15 Subcommittee, please.

16 MR. DICKSON: Thank you, Harold.
17 I wanted to start this out by summarizing some
18 of the written and oral comments that we've
19 heard about gellan gum over the last couple of
20 days. I think we've had quite an extensive
21 discussion of the material with the public in
22 a number of key issues related to its sunset.

1 First of all, we received
2 confirmation from many commenters including
3 numerous current users, certifiers and the
4 primary manufacturer of the material
5 confirming its current use and attesting to
6 its essentiality. A number of companies have
7 actually reformulated their products to
8 replace carrageenan with gellan gum and its
9 current use is widespread in dairy and
10 non-dairy beverages and nutritional supplement
11 beverages, among other products. We also
12 received detailed additional background from
13 its manufacturer during oral comments as to
14 its manufacturer essentiality, technical
15 function and its use as an alternative to
16 carrageenan.

17 Some commenters expressed
18 reservations that there are GMO varieties of
19 Pseudomonas elodea, the bacterium used to
20 produce gellan gum, however, I believe that
21 these concerns are addressed by the fact that
22 the use of GMO organisms would constitute an

1 excluded method and multiple certifiers have
2 confirmed the compliance of all ingredients,
3 or have confirmed that they confirm the
4 compliance of all ingredients as a routine
5 part of inspection, certification and document
6 review.

7 We also received confirmation
8 today from former Handling chair Julie Weisman
9 that the 2008 Board had full access to the now
10 redacted parts of the petition, as did the
11 authors of the technical review.

12 Finally, some commenters noted
13 that the Handling Subcommittee did not
14 consider the use of ancillary substances in
15 the review of the substance, specifically
16 noting that isopropyl alcohol is used in
17 gellan gum's production but has not been
18 specifically reviewed. I'd like to respond
19 very clearly that this material was considered
20 by this and the 2008 subcommittee and that it
21 is not an ancillary substance, but rather a
22 processing aid that is not present at any

1 meaningful level in the finished product.

2 Gellan gum is a non-synthetic
3 substance in wide use with a clear narrative
4 of essentiality and an important role in
5 making a wide variety of organic products
6 possible. For all these reasons I believe
7 that its continued use is justified and
8 supported. That's my summary. Thank you.

9 MR. AUSTIN: Any discussion or
10 questions?

11 CHAIR RICHARDSON: Discussions and
12 questions? Yes?

13 MR. MARAVELL: Just an observation
14 that if the industry is indeed, which it
15 appears to be doing, shifting away from
16 carrageenan and going into gellan gum, I think
17 this represents a good example of cooperation
18 within the organic community. And I think
19 this is something that should be applauded and
20 we should try to work out more often, so I
21 plan to vote in favor of this. I think we did
22 a good job of dealing with some of the issues,

1 the microorganism issue, the redacted material
2 issue. And this shows cooperation. This
3 shows good intent. And this is the way we'd
4 like to see things happen. So that's just an
5 observation, Madam Chair.

6 CHAIR RICHARDSON: Are we ready
7 for the question? Jay?

8 MR. FELDMAN: Was there a
9 checklist for this?

10 MR. DICKSON: There was not a
11 formal checklist used as part of the sunset
12 review.

13 MR. FELDMAN: And do you know if
14 when the subcommittee reviewed this that the
15 Consumers Union's comments were considered?

16 MR. DICKSON: They definitely
17 were.

18 MR. FELDMAN: Okay.

19 CHAIR RICHARDSON: Zea?

20 MS. SONNABEND: The Consumers
21 Union comments provided no citations that we
22 could refer to to justify their positions, and

1 that was one reason why we considered them but
2 then dismissed them as undocumented. I mean,
3 specifically for gellan gum, not consumer
4 expectation.

5 MR. FELDMAN: Right.

6 CHAIR RICHARDSON: We're ready for
7 the question?

8 (No audible response)

9 CHAIR RICHARDSON: The motion on
10 the floor is to remove from the National List
11 gellan gum. Be sure you understand what the
12 no vote means. If you vote no, it means it
13 stays on the List. If you vote yes, then you
14 have removed it. Are you ready for the
15 question?

16 MR. AUSTIN: Point of
17 clarification. The original motion before us
18 was made by Joe Dickson for the record and the
19 second was John Foster.

20 CHAIR RICHARDSON: Thank you. The
21 voting will start with Joe.

22 MR. DICKSON: No.

1 VICE-CHAIR FOSTER: No.
2 MR. STONE: No, ma'am.
3 MR. FELDMAN: Yes.
4 MR. AUSTIN: No.
5 MS. FULWIDER: No.
6 MS. SONNABEND: No.
7 DR. WALKER: No.
8 MR. MARAVELL: No.
9 MR. BONDERA: Yes.
10 DR. TAYLOR: Yes.
11 MR. THICKE: No.
12 MS. BECK: No.
13 MS. FAVRE: No.
14 CHAIR RICHARDSON: Chair votes No.
15 MR. STONE: I'll get it right this
16 time. Three yes, twelve no. Motion fails.
17 CHAIR RICHARDSON: I was thinking
18 of giving us a break, but Mac says you don't
19 need one. So we'll just go out as you need to
20 and come back so we can keep going with these
21 next bunch. So you can blame him, not me.
22 MR. AUSTIN: Okay. Still staying

1 with the Handling venue, that completes our
2 2015 sunset materials. Now we're going to
3 move on into the review of the 2016 sunset
4 materials. And there are 10 of those.

5 I will remind everybody that this
6 is the first posting of these materials for
7 public commentary points and for information
8 gathering points of reference only. There
9 will not be a vote on any of these substances
10 at this point.

11 We're going to change the
12 arrangement slightly on our presentation.
13 Since the 2016 sunset materials also starts
14 our process of ancillary substance review,
15 microorganisms is our guinea pig, so to speak.
16 And with that, we will move forward with that.

17 Lisa, if you could present your
18 reference information on microorganisms,
19 please?

20 DR. BRINES: Yes, thank you,
21 Harold. The listing for microorganisms
22 appears at Section 205.605 of the National

1 List under paragraph (a) for non-synthetic
2 substances. Technical reports are available
3 for this substance including one from 2003 and
4 one that was commissioned in 2014 in support
5 of this sunset review. It was added to the
6 National List with annotation in 2006. Thank
7 you.

8 MR. AUSTIN: Thank you, Lisa.
9 With that, I'll turn it over to Zea to present
10 the Handling Subcommittee's perspective and
11 presentation.

12 MS. SONNABEND: Thank you. Since
13 this was the first posting for this material
14 for 2016 sunset, and Michelle does have it up,
15 we had commissioned a TR and we took the
16 information on the TR. And in our request for
17 additional information to the community we put
18 the points that we particularly were looking
19 for supplemental information on beyond what
20 was in the TR. And that most particularly had
21 to do with the ancillary substances that we
22 are tasked with reviewing along with the

1 active microorganisms.

2 There is a table in the TR. I
3 believe it's table 3, which is a longer
4 version of this list. We went through the
5 list of ancillary substances and removed the
6 ones that are already on the National List
7 that don't have a specific limitation on use
8 because those already can be used without
9 further review. And so what's left here is a
10 combination of the ones from the TR and ones
11 that we sought to gather from certifiers.

12 Now, we got relatively few
13 comments back on the microorganisms based on
14 this first posting. I wish we had heard
15 particularly from more certifiers with how
16 many of their clients use them and what the
17 range of uses was out there. We did hear from
18 a few of you, and thank you very much, but
19 would have liked to hear from more. And I'm
20 sure we will in the second comment period.

21 From the comments that we did hear
22 back there are a few clear points that we need

1 to work further on or that we want to address
2 in this discussion. One of them is the
3 definitions of what a microorganism actually
4 is. There's a small annotation in the rule
5 itself which simply says "any food-grade
6 bacteria, fungi and other microorganism."
7 This could be made clearer and will be made
8 clearer in our summary that we do for the
9 second posting.

10 For instance, the TR covered
11 bacteriophage and bacteriophages are debatable
12 as microorganisms, and plus their uses are
13 sometimes quite different from those of the
14 other microorganisms in foods. And so, I
15 think we need to take a closer look at whether
16 these really should be included in the
17 category of microorganisms or not.

18 Also, there is a lot of confusion
19 in the community because, well, the National
20 List is confusing, but there are some sort of
21 duplicate listing such as -- dairy cultures is
22 really a subset of microorganisms. And then

1 there are some products that are derived from
2 microorganisms but not the microorganisms
3 themselves. And so, this listing needs to
4 have a little more definitional work done on
5 which things are in and which things are not
6 included because they have a separate listing
7 on the National List. So we will be working
8 on that and try to get our terminology
9 corrected when we issue the summary.

10 People brought up the need for
11 criteria for defining "fermentation." These
12 people who brought it up seem to think that
13 the NOSB is capable of dealing with everything
14 and that ACAs and material review
15 organizations are not to be trusted to deal
16 with this, but my reaction is that the
17 definition in the rule that includes
18 naturally-occurring biological processes
19 includes the metabolism of substrates by
20 microorganisms and the isolation steps that
21 happen subsequently.

22 The decision trees given with the

1 Classification of Materials Guidance help MROs
2 and ACAs further distinguish which isolations
3 and which criteria for feed stocks can be used
4 in how microorganisms are produced. I feel
5 confident that the certifiers and MROs can do
6 a much better job of providing this than us
7 and they have access to the information that
8 is usually confidential from the manufacturers
9 about those feed stocks and isolation and
10 purification techniques.

11 So I'm considering this to be
12 covered other than perhaps -- more training in
13 how to do materials review for the ACAs and
14 MROs will occur after the Classification
15 Materials Guidance and Permitted Substances
16 List becomes final and this issue can be
17 covered through training on that list and
18 procedures.

19 Then the ancillaries. In general,
20 we made it very clear in the ancillary
21 substances policy that we adopted that if no
22 ancillary substances were listed or review

1 during our process, none would be allowed in
2 the products. This did not count for 2015
3 substances, although we did not find any
4 ancillary substances in them. But in the 2016
5 substances the only ones that we identified as
6 having ancillaries were the microorganisms.

7 Just because we did not say no
8 ancillaries in every single substance there,
9 that means that we did not know of any. The
10 community could have brought them forward in
11 public comment, and they did not. And so
12 therefore, unless ancillary substances are
13 noted in the TR or in our summary that comes
14 forward at the next time, it will be
15 considered that ancillary substances would not
16 be allowed in those products.

17 Now, I just want to talk about
18 what we did to try and identify all the
19 ancillary substances. Besides sending the TR
20 back for a second round of revision so that we
21 could have a more clear and comprehensive list
22 identifying the ancillaries by functional

1 categories, sending a plea out to certifiers
2 and the organic community to turn in any
3 further ancillary substances from which many
4 certifiers cooperated and sent in all their
5 spec sheets that they are used on behalf of
6 their clients. We looked through dozens and
7 dozens of these spec sheets and MSDSs to
8 determine if there were additional ancillary
9 substances used in the microorganisms. We did
10 not find any beyond these.

11 We were accused by Beyond
12 Pesticide and NOC of not having a complete
13 list, however, they did not provide any
14 additional ones. When I asked Terry for it,
15 I got back something that just had annotations
16 on the list we already had with the National
17 List substances added back in but no brand new
18 ones.

19 Cornucopia stated that some
20 chemicals could be added to protect
21 microorganisms from oxidation including sodium
22 chloride and calcium chloride and others, but

1 they did not provide evidence that these were
2 actually in use in the organic community. And
3 so, hopefully they will do that before the
4 second posting if they would like to have
5 those particular things reviewed.

6 We did not receive any other
7 public comment of specific ancillaries that
8 were missing in this chart.

9 Now, some of these ones on the
10 chart have been petitioned before to be
11 ingredients in food and they were turned down
12 as ingredients, but that does not mean that
13 they should not be considered as ancillary
14 substances where they occur as a fraction of
15 a percent in any formulation. And no evidence
16 was presented that we should not allow these
17 things in such a use. I expect there may be
18 for our next posting, but it has not been
19 submitted so far.

20 So, we provided this chart and the
21 TR with the expectation that those of you who
22 object to particular things on the chart would

1 provide evidence why they should not be
2 allowed. If the TR did not find evidence, it
3 is up to you who object to the substance to
4 point out evidence against these things. It
5 is not up to us to find that evidence.

6 All we heard about, as I said, was
7 previous Board actions on some of these, and
8 we will look back into those ones of those
9 that had TRs done on them and were rejected as
10 ingredients to see what type of evidence was
11 presented, but we were not able to do this
12 before the first posting.

13 Oh, and I guess I should say that
14 a few people said we shouldn't relist
15 microorganisms, but they didn't really say why
16 the microorganisms themselves were a problem.
17 They only said it because of either
18 ancillaries or because of the procedure for
19 sunset. So that's where we stand with the
20 review. Thank you.

21 MR. AUSTIN: Thank you, Zea. Are
22 there any questions at this time from the

1 Board? Jay?

2 MR. FELDMAN: Thank you. I wonder
3 if there's any way of getting the TR folks to
4 -- since they indicated that what they were
5 provided the subcommittee or the NOSB with was
6 examples of materials, is there any way to go
7 back to them and get them to investigate a
8 fuller list or a more complete list?

9 MS. SONNABEND: You mean the few
10 things we added from the spec sheets since the
11 TR was done?

12 MR. FELDMAN: Yes, I mean --

13 MS. SONNABEND: Because this chart
14 in the posting has about three more things
15 that we found from the spec sheets, but
16 they're in these -- no new categories.
17 They're all in the same category.

18 MR. FELDMAN: Okay. Also I'm
19 wondering, it sounds like by the time we get
20 to the second posting the Board will be
21 voting, right? After the second posting the
22 Board will be voting?

1 MR. AUSTIN: Correct.

2 MR. FELDMAN: So you really need
3 this information before the actual notice goes
4 out to be able to incorporate it in if there
5 is additional information, right?

6 MS. SONNABEND: That's why we did
7 a first posting.

8 MR. FELDMAN: Right. So maybe all
9 the groups that were identified as needing to
10 get back to you hopefully will get back to
11 you.

12 MR. AUSTIN: And that is one of
13 the nice things with the two-step process for
14 public commentary is we can go out during the
15 first posting and ask those specific questions
16 and hopefully we get -- for this listing we
17 would have gotten those answers back already.
18 But any other questions, comments? Colehour?

19 MR. BONDERA: Yes, thank you, Zea
20 and thank you, Jay, for your comment because
21 it's actually highly correlated with what I
22 was going to say. Although to add to what you

1 all just said, I think that I'll just remind
2 everybody on the program that the Policy
3 Development Subcommittee did put forth a
4 proposal, a recommendation that was approved
5 by the NOSB so that there is an electronic
6 means for the public to be commenting between
7 meetings. And it doesn't have to be this
8 other format like Zea just said.

9 Because what I had written down
10 was, "before the second posting." Well, there
11 isn't an established means to do so except for
12 somebody to send a letter or email to a member
13 of the subcommittee, because the Program
14 hasn't been able to take our recommendation
15 and turn it into -- they haven't been thus far
16 able to create a means to do that. And I
17 think that that's a missing piece in this
18 puzzle, frankly, in terms of the public being
19 able to between the two postings communicate.

20 And so I just want to put that in
21 the record, that it's kind of, in my opinion,
22 a high-level need especially with this double

1 process with sunset issues. So I really think
2 it's worth paying a lot of attention to the
3 fact that organizations or individuals don't
4 have an established easy means to do what is
5 being now requested in this new sunset
6 process, even though of course they can. I
7 know it's not impossible to do it, but I'm
8 just --

9 MR. AUSTIN: Thank you, Colehour.
10 Miles?

11 MR. McEVOY: Yes, the NOSB
12 recommendation on public communication I think
13 was the one that you were referring to that we
14 support the concept of that of having
15 basically an open docket for NOSB matters.
16 The problem for us is one of resources and
17 implementation of kind of the mechanisms for
18 doing that and the resources that would be
19 required by us to support that particular
20 effort. So the current system is to have the
21 regulations.gov take all the comments from the
22 NOSB so both members of the public and the

1 NOSB can see all the comments.

2 In order for us to keep that open
3 all the time it requires us to do a fair
4 amount of work, and it's a matter of juggling
5 all the other things that we have to do to see
6 how we could do that. We're also looking at
7 it in terms of the money that we got for
8 information technology, if there's something
9 in that, but our priority with that money is
10 to work on the organic integrity database to
11 get the list of certified organic operations
12 more up to date. So that's kind of a long
13 rambling answer to that.

14 But we do have the mechanism of at
15 any time folks can provide comments at
16 nop.guidance@ams.usda.gov. So there's always
17 a way for comments to be received. And the
18 downside of that is that those are comments
19 that are then just to the Program, and then
20 the Program looks at those and would then have
21 to somehow redistribute it out to the NOSB,
22 and it's not as transparent. But there is at

1 least that mechanism for in between time.

2 And I do know that Lisa wanted to
3 make a comment on the ancillary substances
4 component of this, if that's okay.

5 MR. AUSTIN: Okay. Lisa?

6 DR. BRINES: Yes, just a
7 clarification because there's two reviews that
8 are occurring simultaneously. So there's the
9 sunset review for the microorganisms listing
10 which needs to occur on certain time frames in
11 order for us to complete the sunset process.
12 Separately there's the ancillary substance
13 review. Any proposals that might come from
14 that could occur in conjunction with sunset,
15 which is how the review is occurring now for
16 efficiency. But that review for ancillaries
17 could conclude at a subsequent NOSB meeting if
18 needed.

19 So I just wanted to as a
20 clarification point out that those two
21 reviews, though we're discussing them
22 simultaneously, are distinct processes. And

1 that was explained in our memo to the Board on
2 February 3rd. Thank you.

3 MR. AUSTIN: Thank you for that
4 clarification. Mac?

5 MR. STONE: We heard from the ACA,
6 individual certifiers, OTA, consumer groups.
7 they're communicating a lot of this with their
8 customer base, their individuals. We're
9 obviously building this airplane while we're
10 flying it and we're all in it together. So I
11 think that it's sort of a wake-up call and
12 people are going to work, Zea, to sort of get
13 the word out. It is a new process and none of
14 us want it to crash.

15 MR. AUSTIN: Any further
16 questions? Jay?

17 MR. FELDMAN: I'm trying to
18 understand this guidance process because last
19 time we were told about guidance on the
20 bioplastic, biodegradable mulch, it sounded
21 really good. It sounded like there would be
22 a collaborative process and there would be

1 some real guidance to the MROs and how to make
2 a determination on degradation of the
3 bioplastic, and that didn't work out. So on
4 an issue this complicated how do you envision
5 creating a system that's uniform in how MROs
6 made determinations on allowable
7 microorganisms?

8 MR. AUSTIN: Go ahead, Zea.

9 MS. SONNABEND: Since you're
10 looking at me, I think -- but I think what you
11 have is a question for the Department, because
12 they would do the training that would come out
13 in conjunction with the Classification of
14 Materials Guidance. It's not up to the NOSB
15 to do that.

16 On the biodegradable mulch it
17 wasn't for lack of trying. I tried to put on
18 the work plan several times.

19 MR. FELDMAN: No, I thought in
20 your --

21 MS. SONNABEND: And I think it
22 should be on our work plan.

1 MR. FELDMAN: No --

2 MS. SONNABEND: But this should be
3 done between the NOP and the certifier MRO
4 community, I think.

5 MR. FELDMAN: I'm trying to get at
6 whether the NOSB is providing adequate
7 guidance or making an adequate decision
8 vis-á-vis its decision on sunset and maybe the
9 possibility of a petition that would help
10 clarify some of these details around the
11 listing of microorganisms. It sounded to me
12 like you needed to do some petition work in
13 there possibly on the listing for --

14 MS. SONNABEND: I'm not sure what
15 you refer to isn't clear. I mean, I think we
16 need to do some work on the definition, but I
17 think we've been provided that in public
18 comment and we just need to synthesize the
19 public comments with the information in the
20 TR.

21 MR. FELDMAN: Okay. But at the
22 end of the day on the listing that we have

1 that it will be voted on --

2 MS. SONNABEND: Well, I'm not
3 necessarily proposing a change in the
4 annotation, which is very broad, but I'm
5 proposing in our summary we will say these are
6 the things we've reviewed and consider to be
7 in this category.

8 MR. AUSTIN: I'll remind us all
9 that during this process we cannot make
10 annotations to a material that's under sunset
11 review.

12 MR. FELDMAN: That's why I
13 mentioned the petition process, because there
14 has been some concern that some of these
15 annotations, because they are broad and may
16 need to be narrowed in some respects, would
17 require an annotation change. And the Board
18 was waiting on an expedited petition process
19 so that that could be achieved.

20 So just in your presentation you
21 touched on a lot of areas that are yet to be
22 resolved as a part of the sunset discussion

1 and I worry about guidance, I worry about
2 consistency across MROs, I worry about the
3 broadness of the annotations on some of the
4 sunsets and I worry that the Board doesn't
5 have the mechanism it needs to respond to the
6 new science and the new input information that
7 it gets to modernize some of these listings.

8 So that's a bigger conversation,
9 but it was all a part of your presentation in
10 one way or another.

11 MS. SONNABEND: I agree that -- so
12 certain streamlining of the National List so
13 that maybe dairy cultures and microorganisms
14 could be moved would be a good idea, but
15 sometimes the logistical way of doing it is
16 just way too overwhelming to try and
17 undertake.

18 MR. FELDMAN: Right.

19 MS. SONNABEND: And that's true of
20 a number of the things on the National List.
21 And then of course anyone could petition at
22 any point if they need some clarification or

1 another, but I don't feel that we need
2 clarification on this particular listing in
3 order to move forward from the input we've
4 received on the first posting.

5 MR. AUSTIN: Okay. Let's continue
6 moving forward. Any other discussion items
7 with this?

8 Hearing none, let's move onto our
9 next material on the 2016 Handling sunset
10 materials. The next one will be egg white
11 lysozyme, and Tracy will bring this forward on
12 behalf of the Handling -- excuse me, Lisa will
13 give the NOP's presentation, then Tracy.

14 DR. BRINES: Thank you, Harold.
15 The listing for egg white lysozyme currently
16 is included on the National List at Section
17 205.605(a) as a non-synthetic substance. It's
18 currently listed with CAS No. 9001-63-2. This
19 substance was added to the National List in
20 2006 for technical information. The substance
21 is addressed in a 2011 technical report for
22 enzymes, as well as a 2003 Technical Advisory

1 Panel report for enzymes, plant and fungal.

2 Thank you.

3 MR. AUSTIN: Thank you. Tracy?

4 MS. FAVRE: Thank you. Okay.

5 Public comment around egg white lysozyme.

6 It's generally a product that's used as an
7 anti-microbial. It's currently listed, as she
8 said, as a non-synthetic substance allowed in
9 handling.

10 There were several public comments
11 regarding egg white lysozyme. Generally
12 comments against for relisting the material
13 felt like egg white lysozyme produced from
14 commercially-produced eggs presented risks to
15 the environment and the public because of the
16 use of GMO feed and heavy metals in the
17 conventional egg production.

18 Several commenters remarked on the
19 lack of a specific TR for egg white lysozyme
20 and felt that the general one on enzymes was
21 not sufficient to address the issues around
22 conventionally-raised eggs.

1 A few questions were raised
2 regarding the possibility of using organic
3 eggs for egg white lysozyme.

4 CCOF remarked that it is commonly
5 used in the wine industry and that they
6 currently have 12 clients for the material in
7 use indicating that there is demand for it.

8 And finally, there were some
9 comments made regarding the fact that egg
10 white lysozyme is primarily used to prevent
11 spoilage and therefore used as a preservative
12 and for that reason should not be allowed.
13 Thank you.

14 MR. AUSTIN: Thank you, Tracy.
15 Any discussion?

16 Seeing none -- Nick?

17 MR. MARAVELL: Yes, that last
18 provision that Tracy just referred to I think
19 needs some clarification in general. I don't
20 know if the Program can provide it, but my
21 understanding -- and I could be wrong here,
22 Tracy -- is that only refers to synthetic

1 substances. But if someone could clarify
2 that, that synthetic substances can't be used
3 primarily as preservatives for color and taste
4 enhancers, et cetera.

5 And I forget the exact section of
6 the regulation that that's in, but you may
7 have that. But I was just wondering if there
8 was some clarification. So if we're looking
9 at a non-synthetic substance, would that
10 section apply, I guess is my question.

11 MR. AUSTIN: Tracy?

12 MS. FAVRE: Frankly, I was only
13 reporting generally the categories of comments
14 rather than remarking on their accuracy or
15 not, but that's a good point.

16 MR. AUSTIN: Any further
17 discussion?

18 Seeing none, we'll continue to
19 move on. Our next material to present will be
20 L-malic acid. Joe, if you would take point on
21 that, please? Excuse me. Lisa?

22 DR. BRINES: We'll get it by the

1 end. The listing for L-malic acid is
2 currently included on the National List at
3 Section 205.605(a) as a non-synthetic
4 substance. It was added to the National List
5 in 2006 and the most recent technical report
6 is available from 2003. Thank you.

7 MR. AUSTIN: It's good that we're
8 straight across the room and we have eye
9 contact. That's excellent.

10 Okay. Joe, over to you.

11 MR. DICKSON: Thank you, Harold.
12 On L-malic acid, just to quickly summarize the
13 public written and oral comments that we
14 received. We did hear from a number of food
15 manufacturers who are using L-malic acid
16 currently, the Hain Celestial Group in
17 particular. Two certifiers confirmed to us
18 that they have many current clients using the
19 material.

20 A few commenters had technical
21 concerns about the TR that was used. Beyond
22 Pesticides and NOC both expressed concerns

1 about whether the correct form of malic acid
2 was addressed in the technical report and the
3 subcommittee will look very seriously at those
4 concerns between now and the spring meeting.

5 MR. AUSTIN: Any discussion?

6 Seeing none, we will move onto the
7 next material. Next material on our list is
8 activated charcoal. Lisa?

9 DR. BRINES: Thanks, Harold. The
10 listing for activated charcoal is currently
11 included on the National List at Section
12 205.605(b) as a synthetic substance. The
13 current listing reads, Activated charcoal, CAS
14 Nos. 7440-44-0; 646365-11-3, only from
15 vegetative sources for use only as a filtering
16 aid. The substance was added to the National
17 List with its current annotation in 2006 and
18 a previous technical report is available from
19 2002. Thanks.

20 MR. AUSTIN: Thank you, and I'll
21 take the lead presentation on this material
22 for the Handling Subcommittee.

1 In utilization of the current
2 sunset process, and this the first posting for
3 public commentary period, we did post four
4 specific questions to try to garner
5 information for the subcommittee and the Board
6 during this review process.

7 There were 11 specific comments on
8 activated charcoal. All but one of the
9 commenters were in favor of relisting. Three
10 were support of relisting with an annotation.
11 The annotation would be for use only to filter
12 water and require steam activation, which is
13 I've previously said, under this process we
14 cannot make any annotations under a material
15 that's under sunset review at this time.
16 Hopefully in the future.

17 CCOF made a comment that they have
18 13 clients that currently use it, and I think
19 we've had a lot of other commentary during the
20 week, during oral that had talked in support
21 of it.

22 Ciranda, Inc. mentioned that their

1 usage has increased during this current sunset
2 cycle.

3 OMRI suggests that they allow
4 steam-activated charcoal as a source and as a
5 non-synthetic material and thought that we
6 should take a look at asking for public
7 comment back on how much of activated charcoal
8 that is steam-activated generated is there out
9 there and available.

10 Cornucopia suggests that we have a
11 new technical review, but take no position to
12 relist or delist at this time.

13 The public comments from the
14 organic stakeholders such as handlers,
15 certifiers, distributors, processors were that
16 this material was still pretty much essential.
17 It seems that the use during this current
18 cycle has increased and that at this time
19 there does not appear to be a suitable
20 alternative that exists.

21 There was not a TR requested at
22 this time and currently at the moment there

1 has not been a current checklist updated at
2 this moment as well.

3 Any discussion? Seeing none,
4 we'll continue to move on. The next material
5 is paracetic acid. Lisa?

6 DR. BRINES: Thanks, Harold. The
7 current listing for paracetic acid appears on
8 Section 205.605(b) of the National List as a
9 synthetic substance. The listing reads
10 paracetic acid/peroxyacetic acid, CAS No.
11 79-21-0, for use in wash and/or rinse water
12 according to FDA limitations for use as a
13 sanitizer on food contact surfaces.

14 The substance was added to the
15 National List with its current annotation in
16 2006 and a previous technical report is
17 available from 2000 for its processing use.
18 Thank you.

19 MR. AUSTIN: Thank you. I'll turn
20 it over to John to lead the Handling
21 discussion.

22 VICE-CHAIR FOSTER: Well, I think

1 the gods were smiling when they assigned
2 paracetic acid to me. Actually it's one of my
3 last materials for review. So because there
4 was relatively -- we had a handful of public
5 comment. There was overall general agreement
6 it was appropriate to retain that on the
7 National List. The worst comments were that
8 it was a reluctant agreement that it should
9 retain on the National List. So that was
10 really the extent of the differences of
11 opinion.

12 In general, people recognized that
13 it was far superior in the areas of the
14 suitability criteria to other materials such
15 as chlorine compounds, so the committee was
16 fairly uniform in their -- actually I think
17 very uniform in their agreement that it should
18 be retained on the List. In the interest of
19 time I'm going to cut it off there.

20 MR. AUSTIN: Any discussion?

21 Nick?

22 MR. MARAVELL: Yes, and this is a

1 very minor point and it's for Lisa. It would
2 be helpful for us when you put the listing
3 down, or whoever puts the listing down, that
4 you could actually put the section number next
5 to the listing as well. And I'll just comment
6 that you read the listing correctly, but I'm
7 not sure of all of what's in the listing is
8 actually listed in our book right here.

9 So I'm just saying it would be a
10 helpful check and an easy reference for us if
11 we want to go back and find it right away
12 rather than having to go down the list and
13 find it. Minor point.

14 DR. BRINES: Thanks.

15 MR. AUSTIN: Michelle, I think
16 when we put our agenda together, I think what
17 Nick is referring to is that we have it here
18 so that it's an easy reference point.

19 Nick, is that correct?

20 MR. MARAVELL: What I was
21 referring to was the material that we are
22 looking at in our book which has the sunset

1 2016 review summary. And maybe this is more
2 directed to Michelle. I assumed Lisa helped
3 put this together since she was reading that,
4 but in the summary information just put the
5 section number so if we want to go into the
6 reg we don't have to look down the list. And
7 just a note that she read it correctly, but
8 all the words were not in the book. That's
9 all.

10 MR. AUSTIN: Okay. Tracy, you got
11 a comment?

12 MS. FAVRE: I'm not quite sure,
13 but there is actually a -- under the
14 recommendation to relist, it does have the
15 section of the regulation in there.

16 MR. AUSTIN: Thank you, Tracy.
17 Any further discussion or comments?

18 Hearing none, we will continue to
19 move on.

20 Okay. On this next one I'm going
21 to list the three materials that are boiler
22 amines. And then, Lisa, we'll have you read

1 all three of those and then we'll turn them
2 over, because Jennifer and Tracy worked on the
3 three of these. So we're going to make that
4 kind of a joint presentation as we go forward.
5 The three materials will be cyclohexylamine,
6 diethylaminoethanol and octadecylamine. Lisa?

7 DR. BRINES: Thanks, Harold. Each
8 of these substances appears on Section 205.605
9 of the National List under paragraph (b) for
10 synthetic substances, and I'll read each
11 listing in full for the record.

12 First is cyclohexylamine, CAS No.
13 108-91-8, for use only as a boiler water
14 additive for packaging sterilization.
15 Secondly, diethylaminoethanol, CAS No.
16 100-37-8, for use only as a boiler water
17 additive for packaging sterilization. And
18 finally, octadecylamine, CAS No. 124-30-1, for
19 use only as a boiler water additive for
20 packaging sterilization.

21 For each of these substances a
22 technical report was commissioned in 2001, and

1 those are posted. Substances were each added
2 to the National List in 2006. Thank you.

3 MR. AUSTIN: Thank you, Lisa. I
4 believe, Tracy, you were going to take the
5 lead on this and then, Jennifer, you're going
6 to add additional commentary? Thank you.

7 MS. FAVRE: Thank you, Harold. So
8 cyclohexylamine, diethylaminoethanol and
9 octadecylamine are all boiler additive amines.
10 As Dr. Brines said, we did have technical
11 reviews on each of those. In addition, we had
12 the OMRI boiler additive white paper document
13 that we all reviewed as part of this
14 discussion.

15 Generally on public comments
16 across the board the comments were against the
17 relisting in the boiler additive materials.
18 Several comments cited the availability of
19 alternative including steam alone for
20 packaging sterilization.

21 Most comments remarked on the
22 hazardous nature of the materials and felt

1 that their use was inappropriate for organic
2 handling. And comments came from a variety of
3 stakeholders including the general public,
4 consumer groups and industry manufacturers.

5 The one comment that we did get
6 sort of mitigating the negative comments was
7 that there might be a disproportionate impact
8 on smaller processors and to allow an
9 appropriate time for transition from the
10 boiler additives to the other technology that
11 would allow them to switch over. Thank you.

12 DR. TAYLOR: And Tracy covered
13 most of the points. I'd just like to add that
14 Cornucopia commented that a current TAP review
15 needed to be completed based on the fact that
16 the TAP review itself took place in 2001, I
17 believe.

18 Alternative practices. Did you
19 talk about that? Okay. They did mention the
20 steam generator as alternative practices.
21 Smucker's, as well as Cornucopia and OTA, were
22 provided written comments on an alternative

1 practice.

2 And as Tracy also mentioned, I'll
3 say again, that generally the public indicated
4 that these substances were toxic to all
5 organic food production systems and they urged
6 the removal of these materials from the
7 National List. Thank you.

8 MR. AUSTIN: Any discussion?
9 Thank you, Jennifer. Thank you, Tracy. Any
10 discussion?

11 Seeing none, hearing none, we'll
12 continue to move on. Sodium acid
13 pyrophosphate. Lisa, if you could give the
14 NOP statement on that, please?

15 DR. BRINES: Thanks, Harold.
16 Sodium acid pyrophosphate is included at
17 Section 205.605 of the National List under
18 paragraph (b) for synthetic substances. The
19 listing reads sodium acid pyrophosphate, CAS
20 No. 7758-16-9, for use only as a leavening
21 agent. I did note that the annotation was not
22 included in the packet, so we'll have that

1 corrected for the next version.

2 The substance was added to the
3 National List in 2006. A technical report is
4 available from 2001 that addresses sodium
5 phosphates as a group. Thank you.

6 MR. AUSTIN: Thank you. I'll turn
7 it over to Joe Dickson to lead the
8 presentation and discussion on this, please.

9 MR. DICKSON: Thank you, Harold.
10 Let me just find my SAPP document here.

11 So sodium acid pyrophosphate,
12 heretofore referred to as SAPP. To summarize
13 the public comment, we heard from several
14 current users of the material and trade
15 associations such as IFAC, hearing that from
16 a manufacturer perspective, relisting is
17 critical because it is the only leavening
18 agent with certain technical properties.

19 On the flip side we heard from
20 several consumer groups that there are
21 alternatives out there. And I think we have
22 some kind of subjective territory around

1 essentiality and technical effect to discuss
2 between now and the spring meeting and at the
3 spring meeting. I think that will be a really
4 interesting discussion.

5 We heard from several
6 manufacturers who are using it and at least
7 two certifiers with multiple clients who are
8 using the material. Additionally, we also
9 heard from Beyond Pesticides and NOC that both
10 organizations had concerns about this
11 technical review as well and whether it was
12 correctly focused on this use of the
13 substance.

14 MR. AUSTIN: Thank you, Joe. Any
15 discussion or comments?

16 Seeing none, we will move onto our
17 last material for the day for Handling,
18 tetrasodium pyrophosphate. Lisa?

19 DR. BRINES: Tetrasodium
20 pyrophosphate is currently included on the
21 National List at Section 205.605 under
22 paragraph (b), synthetic substances. The

1 current listing reads as follows. Tetrasodium
2 pyrophosphate, CAS No. 7722-88-5, for use only
3 in meat analog products.

4 This substance was added to the
5 National List in 2006 and in support of its
6 review an additional limited scope technical
7 report was developed for this sunset review.
8 There's also a Technical Advisory Panel report
9 from 2002, which is also available. Thank
10 you.

11 MR. AUSTIN: Thank you. Zea, if
12 you would take care of the Handling
13 presentation, please?

14 MS. SONNABEND: Thank you.
15 Tetrasodium pyrophosphate, here-wise known as
16 TSP, has been on the National List since
17 2002. In looking back at the older
18 information, we noticed that a large amount of
19 the petition regarding the manufacturing
20 process and the specific things that it was
21 used in was confident where CBI redacted.

22 The 2002 TAP shed some light on it

1 that it was clearly a synthetic substance, but
2 did not really get at what things it was
3 actually used in and indicated that it failed
4 to meet several of the criteria for review,
5 and yet it was voted onto the list anyway.

6 So we commissioned a limited scope
7 TR to specifically address the alternatives,
8 to try and get more information about the
9 specific uses and why it would be the viable
10 choice and why. And then we also raised the
11 concern about it being used as a texturizer
12 for something that would be extremely
13 processed, even though it would start from an
14 organic source.

15 Our preliminary discussion around
16 this substance made us inclined to remove this
17 substance in actuality since the TR came back
18 with many, many alternatives, both alternative
19 vegetarian protein sources and alternative
20 ways of processing protein.

21 As far as public comment, we heard
22 only one comment in favor of keeping it, from

1 the International Food Additives Council.
2 Although they state that this would
3 significantly impact the quality and
4 availability of analog meat products if we
5 removed it from the List, as you heard when
6 they gave comment, they were not able to give
7 specific examples in either their written or
8 their verbal testimony. We heard from no
9 users who use this and we heard from no
10 certifiers who have clients who use this.

11 This is a processing aid, not an
12 ingredient, and therefore it would not appear
13 on a product label. And as such, it would be
14 very hard for someone doing a search to try
15 and identify which areas it was used from
16 public information.

17 So we did hear from three
18 organizations and one individual against it:
19 Beyond Pesticides, Consumers Union and
20 Cornucopia. They agreed with our assessment
21 that there are plenty of alternatives and
22 there are some potential reasons to think that

1 it would not meet the criteria.

2 So moving forward we will take a
3 look at this further, but I do not feel we've
4 gotten any compelling evidence to change our
5 inclination to remove it from the List.

6 MR. AUSTIN: Thank you, Zea. Any
7 discussion or comments?

8 I would just clarify for the sake
9 of record and to, I guess, further iterate the
10 first step of the sunset process, the new
11 phase of it. During our preliminary review,
12 as Zea stated, for TSPP, it is kind of the
13 sentiment of the Handling Subcommittee that
14 our inclination will be to look at this one
15 for removal from the National List and allow
16 it to sunset off.

17 We're also considering that same
18 approach to the three boiler amines as well.
19 We're asking for stakeholder input back to see
20 if ammonium hydroxide would be an adequate
21 replacement for these three amines and if
22 there's any other processes out there that

1 might also be substitutes.

2 So for clarity and transparency, I
3 just wanted to let you know that that is the
4 tentative position of the Handling
5 Subcommittee on this preliminary review.

6 And with that, Madam Chair, that
7 ends the Handling presentation for this
8 afternoon.

9 CHAIR RICHARDSON: That's all? I
10 mean, nothing else?

11 MR. AUSTIN: We could keep going.
12 We have 104 2017. Be careful.

13 CHAIR RICHARDSON: Okay. All
14 right. We can start on next year's now? Oh,
15 okay. Thank you, Harold. You didn't do too
16 bad a job there. Good job, lad.

17 I would now like to turn it over
18 to the chair of the CACS Subcommittee to take
19 her report. Carmela?

20 MS. BECK: All right. Thank you,
21 Madam Chair.

22 So the Compliance, Accreditation

1 and Certification Subcommittee worked on one
2 discussion document this past semester, and
3 that was the assessment of soil conservation
4 practices.

5 And so, the NOP issued a memo to
6 the NOSB on April 25th, 2014 tasking us with
7 development of this discussion document. And
8 the origin is that there were concerns raised
9 regarding the appropriate use of soil
10 conservation practices on organic farms. And
11 so, as we're all aware, 205.200 requires that
12 production practices on organic operations
13 must maintain or improve the natural resources
14 of the operation.

15 So some continued background is
16 that the NOP was hoping to evaluate the
17 compliance of how the regulation has
18 implemented the soil conservation provisions.
19 And so, we opted to publish the 10 questions
20 primarily to get feedback from certifiers and
21 the general public regarding how they assess
22 soil management practices and to determine

1 what gaps there might be in these assessments.

2 And so, we received a total of 12
3 comments, and there were 11 organizations and
4 there was 1 individual. And there's a lot of
5 text on here. You'll find that many of the
6 commenters' text is reflected in the general
7 themes. But overall there was a reiteration
8 that soil conservation, as we heard earlier
9 today, is the cornerstone of organic farming,
10 that soil conservation practices are
11 documented in organic system plans, and
12 there's a general understanding that
13 certifiers and inspectors are well-versed in
14 the regulation and that they're well-qualified
15 to determine the compliance with 205.200.

16 Let's see. There was also
17 comments expressing that inspectors have
18 adequate training and that continued education
19 is a requirement. Alternately, there was a
20 comment that said certification personnel were
21 lacking particular conservation expertise and
22 education and that there was an opportunity

1 for training to be developed.

2 And overall there also was a sense
3 that soil conservation problems aren't
4 necessarily an issue and that in the event
5 that it is an issue, it's the common practice
6 that certification agencies would issue
7 non-compliances when applicable and there are
8 opportunities to request that said operations
9 would work with NRCS and/or the RCD to develop
10 a compliance plan.

11 So overall there was a preference
12 for continued reliance on a combination of
13 qualitative inspection tools over the
14 quantitative tools that were suggested in the
15 document. The qualitative examples that we're
16 familiar with that inspectors implement
17 include the visual observation, grower
18 interviews, review of harvest records, testing
19 for organic matter levels, inspections that
20 are scheduled at different times of the year,
21 and then year-to-year evaluations, and soil
22 aggregate formations.

1 So there was also a common theme
2 that folks wanted us to focus on the broader
3 topic of biodiversity and not just focus on
4 the narrow soil conservation practices. And
5 in the subcommittee we had this conversation
6 about whether or not to broaden the scope, and
7 we determined that we would stick to what the
8 request was in the NOP memo asking us to look
9 at soil conservation assessments.

10 So there were also some
11 opportunities that were identified or food for
12 thought for us to take back to the
13 subcommittee to consider as we move forward on
14 this document. And so, there's a lot of text
15 there. So there's a need to improve
16 consistency among certifiers and inspectors.

17 There was a commenter that said
18 that additional education would need to be
19 developed in the event that new requirements
20 were enacted. And the other common theme was
21 that there is actually an opportunity now to
22 develop new trainings and educational

1 opportunities.

2 And then there was a request that
3 we don't just make mention of the NRCS, but
4 make mention of other organizations that could
5 complement the work that we do or with whom we
6 could partner to see how we could learn from
7 their quantitative tools.

8 Let's see. So then there was also
9 a couple comments that said that the NRCS and
10 crop consultants actually needed some work
11 themselves to better understand our systems.
12 And so there is an opportunity there to
13 provide them with educational materials.

14 And then some more innovative
15 thinking came out of CCOF where they talked
16 about perhaps looking at conducting a soil
17 assessment inspection dedicated solely to that
18 every few years to capture what might not be
19 captured in the one snapshot of an annual
20 inspection that takes place.

21 And then also Nate made reference
22 to the Northeastern University National Soil

1 Project to look at their testing. So that's
2 something that we can bring back to the
3 subcommittee.

4 Oh, and I guess that concludes my
5 presentation, ma'am. Jean, that concludes my
6 presentation. Sorry.

7 CHAIR RICHARDSON: That was an
8 excellent report. Thank you. Much
9 appreciated.

10 MS. BECK: So are there any
11 questions that we can -- yes.

12 MR. THICKE: I just have a
13 comment. Thanks. It was a good report and
14 good work here.

15 I think it's good to work with
16 NRCS, but we also have to recognize that NRCS
17 is very prescriptive and isn't very holistic
18 in their thinking. And so, I mean, that's
19 maybe not a good way to put it. And organic
20 systems are very comprehensive and complex and
21 variable and we can't put those prescriptive
22 things in there. But we can learn a lot from

1 them, I think, and we can use some of their
2 tools, and I think they can learn a lot from
3 us. So working together is a good thing.

4 However, I think that just making
5 soil conservation very visible maybe through
6 communications with the National Organic
7 Program and with the certifiers it will help
8 a lot. Because farmers, no one wants to have
9 erosion problems. We really aware of it and
10 we don't like that at all. And just knowing
11 it's higher on the radar is going to make a
12 difference, I think.

13 CHAIR RICHARDSON: Mac?

14 MR. STONE: Yes, to follow up on
15 that, Francis, we think of erosion as a plowed
16 field or the dirt between the rows corn or
17 something, and organic farmers are the last
18 one to want to see any kind of erosion and
19 probably obey the cultural rules of contour
20 farming, et cetera, as well as anyone.

21 But also to Francis' point, when
22 we have creek crossings for cattle and lanes

1 to get cattle into different grazing paddocks
2 and heavy use areas and there's lots of other
3 places that erosion can occur. And NRCS does
4 have some great tools and cost share funds and
5 all sorts of things. So I really urge the
6 partnership -- and there's things we can learn
7 and work together.

8 And of course any farmer can get
9 caught with their pants down if the big storm
10 comes in when you've got open ground in
11 planting season or something, but there are a
12 lot of resources and tools within NRCS and FSA
13 that we should work together on.

14 And to finish, certifiers, from
15 being through many inspections and -- at our
16 farm and having done inspections on farms,
17 reviewers -- that these certifiers have eyes
18 in the back of their heads and they can tell
19 for several years farmers that are doing it
20 well.

21 And they can instruct inspectors
22 to look for certain things because they can

1 see things on paper that a lot of us wouldn't
2 see. So again, a shout out to certifiers,
3 that they're a real asset to helping farmers
4 and work together.

5 CHAIR RICHARDSON: John?

6 VICE-CHAIR FOSTER: I think
7 Francis hit -- probably my main message is the
8 value that we can get from very active
9 collaboration with the NRCS.

10 And I'm sure there's other more
11 local organizations that do some of this work
12 that may not have a national profile, but
13 maybe very high profile in a region or a
14 valley or some place that's had these kind of
15 issues. And across all agriculture, not just
16 organic agriculture.

17 It's another place. It's going to
18 be really interesting because we can learn a
19 lot about how to apply best practices from all
20 farms, not just organic farms. I think
21 anytime we can do that and have the
22 conversation, it's yet another place that

1 organic practices may be able to encroach a
2 little bit into the conventional space also.

3 And I've said before on record, I
4 think the value of little tidbits of organic
5 ways that sneak into conventional is a very
6 powerful thing and one I don't think we talk
7 about enough, that the benefit that organic
8 has is true. On the ground that's been
9 converted to organic practices, yes, but if
10 all of conventional ag took one percent
11 improvement from organic practices and applied
12 it across the 97 percent of agriculture in
13 America, that's a huge benefit, and this could
14 very well be an entry point for that.

15 And then I also wanted to clarify
16 something Carmela said. Why we stuck with the
17 scope of work that the NOP provided was that
18 -- and we had good, good thorough
19 conversations about this in subcommittee --
20 was that the topic of a much broader issue was
21 too much to handle, really, trying to tackle
22 all of soil management, what that means for

1 crop production cycles and implements.

2 And that was too big a piece. We
3 felt like it was appropriate, the scope of
4 request was appropriate and we wanted to make
5 sure we could deliver something that was
6 tangible in the areas that we were asked.
7 That's why we limited it to that scope.

8 CHAIR RICHARDSON: And I think we
9 should also add -- just a sec, Nick -- is that
10 we also -- I'm also on that subcommittee -- is
11 that we will be turning this into a proposal
12 during this spring semester ready for the
13 April meeting. So we'll have a proposal
14 format to be voted on based on public input
15 and our work.

16 Nick?

17 MR. MARAVELL: Carmela, I think
18 one of the take-aways here is if you mention
19 NRCS, you got a hot button here. And we've
20 heard some very pointed and good information.

21 NRCS is capable of being helpful
22 and for a long time the organic farmers have

1 sort of flown under the radar in terms of
2 NRCS, and that's because they don't understand
3 our systems. And when you accept their fixes
4 or their tools, you also accept some strange
5 restrictions that don't necessarily apply in
6 any way to an organic system.

7 And the Department has been
8 working on that to try and turn that around,
9 but what I'm hoping is that through this
10 process both sides can learn and that we can
11 help turn that around a little bit.

12 And then maybe what John is saying
13 is that a lot of that will find its way into
14 the conventional farming community as well.
15 Because while organic farmers have good reason
16 to fly under the radar on some of these
17 issues, a lot of the conventional farmers are
18 trying to do the same. And if there were
19 things that were more easily implementable and
20 more forward looking, I think there would be
21 much better communication and cooperation
22 between the farming community and the NRCS on

1 some of these issues.

2 So hopefully this will be an
3 opportunity -- maybe Betsy should be involved
4 more closely with this, too, so that it has
5 some impact within the Department. I mean,
6 there's a real opportunity here.

7 CHAIR RICHARDSON: Other comments
8 for Carmela's committee?

9 Okay. Hearing none -- I can't
10 believe it. You mean we can go home now?

11 I'll just remind the Board members
12 that you need to meet down in the lobby in
13 order to leave by 6:15. And to everybody here
14 I would like to adjourn this meeting. Thank
15 you for your patience. My apologies -- sorry?
16 Recess. There you go. See, I'm tired. No,
17 I'm not going to adjourn it.

18 We're recessing it until tomorrow
19 morning at 8:30. And I would like to thank
20 you all very much for your tolerance of
21 sitting through without a proper break today,
22 but I think we needed to have that

1 conversation on the record and I appreciate
2 your patience with us. Thank you. See you
3 tomorrow.

4 (Whereupon, the above-entitled
5 matter went off the record at 5:17 p.m.)

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C E R T I F I C A T E

This is to certify that the foregoing transcript

In the matter of: National Organic Standards Board

Before: USDA

Date: 10-29-14

Place: Louisville, KY

was duly recorded and accurately transcribed under
my direction; further, that said transcript is a
true and accurate record of the proceedings.



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UNITED STATES DEPARTMENT OF AGRICULTURE

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NATIONAL ORGANIC STANDARDS BOARD MEETING

+ + + + +

THURSDAY, OCTOBER 30, 2014

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The National Organic Standards Board met in Grand Ballroom B, Galt House Hotel, 140 N. 4th Street, Louisville, Kentucky, at 8:35 a.m., Jean Richardson, Chairperson, presiding.

PRESENT:

JEAN RICHARDSON, Chairperson
JOHN FOSTER, Vice Chairperson
MAC STONE, Secretary
HAROLD AUSTIN
CARMELA BECK
COLEHOUR BONDERA
JOE DICKSON
TRACY FAVRE
JAY FELDMAN
WENDY FULWIDER
NICK MARAVELL
ZEA SONNABEND
JENNIFER TAYLOR
FRANCIS THICKE
C. REUBEN WALKER

STAFF

MICHELLE ARSENAULT, Advisory Committee
Specialist
LISA BRINES, NOP National List Manager
EMILY BROWN ROSEN, AMS NOP Specialist,
Standards Division
MILES MCEVOY, AMS NOP Deputy Administrator
CARRIE RICCI, Office of General Counsel

A G E N D A

Livestock Subcommittee (LS). 4
 Tracy Favre, Chairperson
 Present Subcommittee proposals and discussion
 documents. Summarize with written comments

Topics:

Proposal: Vaccines from Excluded
 Methods (GMO Vaccines)
 Verbal Report: Aquaculture Review
 History.

Crops Subcommittee (CS).47
 Zea Sonnabend, Chairperson
 Present Subcommittee proposals and discussion
 documents. Summarize with written comments

Topics:

Verbal Update: Inerts.47
 Discussion Document: Contamination
 Issues in Farm Inputs Literature
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Subcommittee Workplans 148

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Presentation of Plaques for Outgoing
 Members. 173
 Other Business 209

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

2 8:34 a.m.

3 CHAIR RICHARDSON: Well to start
4 off this morning, John Foster, as Vice Chair,
5 is going to give us a few words of
6 inspiration, or something.

7 (Laughter.)

8 VICE CHAIR FOSTER: Jean, when you
9 said, was I ready, I didn't know if you meant
10 ready, like ready-ready. All right. So this
11 is one of my favorite poems from one of my
12 favorite authors, and there's a few nice key
13 words in it that I think will resonate with
14 everyone in the room. This is D.H. Lawrence,
15 for those of you who are again keeping track.

16 The magnificent here and now of
17 life in the flesh is ours and ours alone, and
18 ours only for a time. We ought to dance with
19 rapture that we should be alive and in the
20 flesh, and part of the living incarnate
21 cosmos. I am part of the sun as my eye is
22 part of me. That I am part of the earth, my

1 feet know perfectly and my blood is part of
2 the sea. My soul knows that I am part of the
3 human race. My soul is an organic part of the
4 great human soul, as my spirit is part of my
5 nation. In my own very self, I am part of my
6 family. There's nothing of me that is alone
7 and absolute except my mind, and we shall find
8 that the mind has no existence by itself. It
9 is only the glitter of the sun on the surface
10 of the waters.

11 CHAIR RICHARDSON: Thank you,
12 John. That was lovely. The first order of
13 the day is the Livestock Subcommittee, Tracy
14 Favre, Chairperson.

15 Livestock Subcommittee Report

16 MS. FAVRE: Thank you, Jean. Good
17 morning, everyone. I hope you managed to
18 survive running the gauntlet of teenage
19 hormones and blue corduroy this morning as you
20 came down the hallway.

21 First order of business for us
22 this morning is going to be the discussion

1 document proposal, the livestock vaccines made
2 with excluded methods. Jean was our lead on
3 that, so Madam Chair, I'll turn that back over
4 to you.

5 CHAIR RICHARDSON: Thank you.

6 Well, this wasn't an easy one and it isn't an
7 easy one, and it's not going to go on being
8 easy for the next few years, I think. I'll
9 first of all run through the public comments
10 that we've received for this round, because
11 obviously there's been several reports that
12 we've put out over the last two and a half
13 years or so.

14 We have received about 150 written
15 public comments, which give us a very useful
16 body, I think, of public comment for us all to
17 consider, and I really thank everyone very
18 much for the comments that came in, because
19 the amount of detail that we had in those
20 comments, I think, will be very useful to us
21 as we try to wrestle with this issue.

22 So there were many -- to summarize

1 the comments, there were many individuals who
2 sent reminders that the public does not expect
3 GMOs in organics, and we all agree on that.
4 There are no GMOs in organics and should not
5 be.

6 There were about 120 individuals
7 who agreed with the comments made by Beyond
8 Pesticides, that the NOSB shouldn't send this
9 back -- should not send it on to the NOP, but
10 that we on the NOSB should continue to work on
11 a definition of excluded methods.

12 There is concern that the NOP, on
13 its own, isn't going to be able to deal with
14 this, because it involves a much wider range
15 of stakeholders, and that the Secretary of
16 Agriculture should however be asked to develop
17 a list of approved vaccines, and I'll talk a
18 bit more about that in a minute or two.

19 There's also concern that because
20 the USDA also promotes genetic engineering, it
21 means that there may be sort of a conflict in
22 their ability to deal with it, and let's see.

1 The National Organic Coalition was similar to
2 those of Beyond Pesticides, and they
3 recommended also that the guidance should come
4 from the NOSB and not the NOP.

5 The Center for Food Safety agrees
6 with the NOSB that a comprehensive system of
7 classifying the available vaccines is needed,
8 and that certainly is one of the main
9 messages, I think, that we still have to
10 continue working on over the next year through
11 the NOP, in order to avoid the risk of
12 producers accidentally or unintentionally
13 using a prohibited technology.

14 Everyone agrees that we need a
15 definition, a new definition of excluded
16 methods. The Center for Food Safety does not
17 agree with the use of GMO vaccines even during
18 emergencies, and the CFS also reminds us that
19 consumers seek out organics specifically to
20 avoid GMOs.

21 One commenter in the written
22 materials, speaking on behalf of the poultry

1 industry, expressed serious concern that the
2 poultry industry needs to have the ability to
3 use a GMO vaccine, if necessary, against some
4 salmonella strains, and certainly we heard
5 that in an oral comment with California soon
6 to be requiring one of the salmonella GMO
7 vaccines to be used as part of their
8 salmonella control policies.

9 While it's easy for me to remind
10 the poultry industry that they can certainly
11 petition the NOSB for a GMO vaccine, I know
12 that that takes time. But that is something
13 that is on the books and it could be done, and
14 it's part of the system in place right now.
15 But it is obviously a time-consuming thing to
16 do.

17 Certainly, the salmonella was the
18 one area -- it's not all the salmonella, but
19 one of the salmonella strains was certainly
20 the one sort of serious hole in the vaccine
21 list that we found when Nick and I were
22 working on the working group.

1 For everything else, we found that
2 it was possible -- that we are aware of was
3 possible to have non-GMOs. But the salmonella
4 is the sticking point. The Farmworker Support
5 Committee asks that we work towards a
6 definition of excluded methods.

7 MOSES agreed with allowing GMO
8 vaccines in federal and state emergencies, and
9 they would suggest also allowing GMO vaccines
10 if there were no non-GMO vaccines available
11 that served the same purpose.

12 Cornucopia supports the Livestock
13 Subcommittee's report and recommendation that
14 the NOP develop guidance necessary to help the
15 certifiers in their work.

16 Three certifiers provided
17 comments. PCO expressed support for the
18 recommendation and stated the following: the
19 success of any guidance regarding GMO vaccines
20 is inextricably linked to a thorough
21 definition of excluded methods.

22 PCO goes on to suggest that future

1 NOP guidance should be done in conjunction
2 with the Materials GMO Ad Hoc work on excluded
3 methods terminology. While there is some
4 overlap, there is also some differences
5 obviously with vaccines as opposed to seed.
6 But we obviously can consider that.

7 MOSA, Midwest Organic Services,
8 expressed widespread concern that for
9 certifiers who have to review the vaccines
10 used by their clients, and the need for
11 clarity now regards excluded methods, and they
12 ask for a trade name list of vaccines made
13 with excluded methods.

14 NOFA Vermont asks the NOSB to work
15 collaboratively with the NOP on the issue.
16 Organic Valley Crop Cooperative said, we
17 appreciate the work and research the Livestock
18 Subcommittee put into the vaccines report and
19 proposal, and look forward to guidance from
20 the NOP.

21 They added we asked the NOP to
22 consider the effects of the California egg

1 safety rule on organic farmers shipping eggs
2 into California. The Alliance for Natural
3 Health wants the NOSB to work for
4 clarification. OTA supports the vaccine
5 document and recommendations and states,
6 quote, the OTA agrees that the prohibition on
7 excluded methods in organic production must be
8 affirmed by appropriate guidance on avoiding
9 excluded methods in all aspects of the organic
10 industry, including Livestock vaccines.

11 The OTA thanked the Livestock
12 Committee for the work, and especially for the
13 history of the work done to date as we move
14 forward.

15 So that's just a synopsis of the
16 comments for this one. The comments from all
17 the previous reports we have done were
18 incorporated into the report which went on the
19 Federal Register. Just to sort of respond to
20 some of the concerns, I think working up a
21 list is -- it's not -- even that's not easy,
22 and there are lots of reasons for it.

1 But I mean I think that the NOP
2 needs to work with the right folks to try to
3 get that to happen. Perhaps they should set
4 up a new working group next year when they've
5 had time to think through which pieces of it
6 to work on in sequence, because when you
7 looked at the ---

8 When we looked at the APHIS's CVB,
9 which regulates the vaccines, what we found
10 was that the CVB tracks the vaccines that are
11 made through biotechnology, but their
12 evaluation of whether a vaccine produced
13 through biotechnology, what that exactly
14 means, doesn't actually align very well with
15 the organic standard for excluded methods.

16 So even though we have a list with
17 all kinds of symbols next to it, which you can
18 more or less translate and more or less use as
19 a certifier, it really isn't a perfect match.
20 So that would be one of the areas in which the
21 NOP should try to work with the CVB, to see if
22 they can get a better alignment for the

1 technological -- the biotechnology as opposed
2 to the excluded method definition.

3 CVB does review the use of
4 biotechnology. However, if only the cell line
5 is used to culture the vaccine seed as a
6 genetic insertion, deletion or mutation, then
7 the vaccine itself is not considered to be
8 recombinant.

9 So there's a sort of a, you know,
10 a nuanced difference there that makes the --
11 makes the way in which you might write a list
12 really very complicated to do. But it doesn't
13 mean we shouldn't keep on trying to do it.

14 The other thing that I -- let's
15 see, that I thought was important to sort of
16 highlight was related to what we found, as we
17 worked through the committee, was the use of
18 transposons in vaccine production.

19 The working group considered that
20 if transposons would fit into the allowance
21 for traditional breeding techniques, then the
22 working group couldn't be clear at what point

1 traditional breeding techniques are divided
2 from the modern or non-traditional breeding
3 techniques.

4 So is there a point in time at
5 which all techniques before that time are
6 considered traditional, and all new techniques
7 developed after that time are not considered
8 traditional. So the definition of excluded
9 methods allows traditional breeding
10 techniques. So the distinction then becomes
11 important for organic producers. We don't
12 have sort of a date there which we have really
13 talked about to agree on, at which point we
14 can then move forward and determine which of
15 the techniques fall within this definition or
16 within a new definition.

17 So I wish it was easy, but the
18 easy things have been done already. We just
19 have the difficult ones facing us ahead. So
20 with all these things going on, I think that
21 I can sum up sort of by saying that we still
22 need a list that is an interim useful list

1 that certifiers can use, and I think that that
2 is something that the NOP could in fact be
3 working on.

4 We need to remind the poultry
5 producers that they can petition for an
6 exception although -- and that may be -- even
7 though that takes a long time, that may be
8 worthwhile doing, and perhaps we should
9 consider suggesting that the NOP additionally
10 sets up a new working group next year some
11 time, that we can work on specific issues of
12 the excluded methods definition and see how
13 that goes.

14 But it isn't easy, and I don't
15 think right now that there's anything further
16 really that the NOSB can do. So I really
17 would like to see the NOP take a shot at
18 developing appropriate guidance, and I know
19 Miles really wants to get this back on his
20 plate. Comments? Do we have any discussion?
21 Colehour, you had a question?

22 MR. BONDERA: Yes, thank you. I

1 guess you made a comment in your presentation,
2 and I think that I have -- I probably came in
3 here with it, so I'm probably carrying it
4 around a little bit.

5 So it was just a little snippet of
6 something you said, and I'd like you to expand
7 on it, which is related to the excluded
8 methods definition issues, which is a broader
9 category.

10 My opinion is that this vaccine
11 component fits within that, and I'm wondering
12 if you could address or talk about how an
13 excluded methods working group, for example,
14 would not only be on excluded -- on vaccines
15 per se, but on the more broad topic that we
16 had presented from the Materials Committee, in
17 terms of how this fits into the bigger picture
18 of excluded methods, and you did mention at
19 least one comment related to that subject.

20 I think from my perspective, you
21 know, putting the pieces together is a
22 critical component, and working on them

1 separately, my experience is they seem to get
2 sometimes lost and not associated.

3 I think since we as a group have
4 been working on this, that's one of my
5 questions and concerns is, can we put this all
6 together and how it's going to come all
7 together. So a little bit unclear to me. So
8 I don't know if you can expand or address that
9 a little further. Thank you.

10 CHAIR RICHARDSON: Well, I'll
11 probably ask Zea to add in some comments here
12 from her working group and obviously I've been
13 sitting in on that and reading the materials
14 from the GMO Working Group and the excluded
15 methods discussion.

16 And to some -- to a large extent
17 obviously, when eventually we come up with a
18 new definition of excluded methods, whenever
19 that is, it will apply, I would assume, across
20 both plant and vaccine materials.

21 But I think that there's enough of
22 a difference that we still have to be looking

1 and working right now on getting the --
2 working on using the present definition of
3 excluded methods to try to get a list in the
4 short-term, so to speak, because it's going to
5 be a long time before there is in fact a new
6 definition.

7 I think from the way I look at the
8 genetics, is that there's enough of a
9 difference that it doesn't entirely fall all
10 within the same -- the same sort of motif, if
11 you will, as the seeds one that Zea's been
12 working on.

13 But Zea, I wonder if you can add
14 what you think and your perspective as to
15 whether we should roll these two things in
16 together.

17 MS. SONNABEND: I do think long
18 term for sure. But as you say, it's going to
19 be quite a long time until we have a
20 definition, much less get into the weeds on
21 the exact methods.

22 I do know, and to complicate

1 matters, I do know that the feedback we
2 received from the first discussion document,
3 particularly regarding the transposons and
4 transduction techniques, which was mostly from
5 FiBL in Switzerland and they had it in their
6 chart, and they said it depends.

7 They gave, you know, a few
8 examples of what it depends on. But that's
9 not an answer we can work with right now. So
10 we're going to have to sift through it and
11 it's not there yet.

12 CHAIR RICHARDSON: Yes, Nick.

13 MR. MARAVELL: Yes. I'd just like
14 to make a few observations and also concur,
15 Jean, with what you just said, that if we try
16 to take the GMO vaccine issue and roll it in
17 with the definition of excluded methods, at
18 this very moment, it will result in a delay of
19 moving forward with the -- with the immediate
20 need to identify which vaccines do seem to be
21 permissible.

22 The other sort of minor historical

1 observations are that going back to a time of
2 traditional breeding or vaccine-making, if I
3 remember correctly, in our work, we discovered
4 the first GMO vaccine in the mid-80's out of
5 ARS. So it's been going on a long time. So
6 if you're looking for a date, it takes you way
7 back.

8 A second observation is it is
9 possible and has been for well over 100 years
10 to develop vaccines without excluded methods,
11 including for poultry.

12 So I just, you know, would make
13 the point to the organic community, as well as
14 to the Board, and not to make a pun, we've got
15 a little bit of a chicken and egg scenario
16 here, that if we aren't firm in our review of
17 this issue, there'll be no incentive to simply
18 create vaccines that don't use excluded
19 methods that organic poultry producers could
20 take advantage of.

21 CHAIR RICHARDSON: Miles.

22 MR. McEVOY: This is a complicated

1 issue, and it goes back. I just wanted to
2 remind you of the NOP's response to this issue
3 back in, I think it was in 2010, and this is
4 based on the recommendation that came out of
5 the NOSB in 2009.

6 I just want to read from the memo
7 to the Board at that point. On November 5th,
8 2009, the NOSB made a recommendation to
9 clarify that vaccines produced through
10 excluded methods or GMOs are allowed under
11 205.603, and do not need to be individually
12 petitioned for allowance on the National List.
13 So that was the recommendation from 2009.

14 Further, the NOSB recommended that
15 vaccines produced from non-excluded methods be
16 located and used before those produced by
17 excluded methods. So we go on to say that the
18 preamble to the National Organic Program final
19 rule states that the Act allows use of animal
20 vaccines in organic livestock production,
21 given the general prohibition on the use of
22 excluded methods.

1 However, we believe that animal
2 vaccines produced using excluded methods
3 should not be allowed without an explicit
4 consideration of such materials by the NOSB,
5 and without an affirmative determination from
6 the NOSB that they meet the criteria for
7 inclusion on the National List.

8 It is for that reason that we have
9 not granted this request of commenters, but
10 rather provided an opportunity for review of
11 this narrow range of materials produced using
12 excluded methods through the National List
13 process.

14 The NOP's understanding is that
15 excluded methods are prohibited under Section
16 205.105(e), except for vaccines. Further,
17 this exception applies to vaccines that are
18 produced through excluded methods only if
19 those GMO vaccines are approved according to
20 205.600(a).

21 Vaccines are listed under
22 205.603(a)(4) under Biologics Vaccines. The

1 NOSB has not reviewed vaccines in accordance
2 with 205.600(a). The listing under
3 205.603(a)(4) of biologics vaccines does not
4 include the allowance of GMO vaccines.

5 The NOP requested a legal review
6 from USDA's Office of General Counsel to
7 determine whether vaccines produced through
8 excluded methods are currently allowed under
9 205.603(a)(4). The OGC opinion supports the
10 position that GMO vaccines are allowed only if
11 they are approved according to 205.600(a), and
12 that has not occurred.

13 The NOP recommends that the NOSB
14 review GMO vaccines under the provisions of
15 205.600(a). The NOP suggests that the Board
16 request a technical review for biologics
17 vaccines, including the status of genetically
18 modified vaccines and assessment of the
19 economic impact of using commercially
20 available criteria for non-genetically
21 modified vaccines.

22 After the Board completes the

1 evaluation according the OFPA criteria, it may
2 submit a recommendation to NOP to add GMO
3 vaccines to the National List of Allowed and
4 Prohibited Substances.

5 So I just wanted to remind you
6 that that kind of started -- this is -- this
7 process started quite a long time ago, with
8 the recommendation from 2009.

9 There was probably a lot of work
10 done to get to that point from that
11 recommendation from 2009. The Board and the
12 GMO Vaccine Task Force has done a lot of work
13 on this issue, and received a lot of really
14 great information about where to go from here.

15 But we're still sort of at a very
16 difficult situation. It's difficult to know
17 how to go forward. What we're looking for is
18 more specific recommendations, guidance from
19 the NOSB about how to approach this issue of
20 GE vaccines.

21 Currently they're not authorized
22 by the regulations. The challenge is, is that

1 how do we determine whether a vaccine is an
2 excluded method or not? There's a lot of
3 information in the report that was submitted
4 previously by the Board, and what I'm hearing
5 now is that the Board wants us to make that
6 distinction, rather than getting that guidance
7 from the Board of how we should make that
8 distinction.

9 We can do that. We did that with
10 cell fusion, for instance. It would take us
11 some time and resources to put that guidance
12 together. But frankly, we'd prefer to have
13 that recommendation come from the Board, of
14 where to make that distinction about what's a
15 GE vaccine, what's an excluded method vaccine.

16 The other thing to consider in all
17 of this is we have a lot of things to do, and
18 I think one thing I've learned over the last
19 five years is that we can't do it all, and
20 that -- so therefore we're trying to focus on
21 what we feel is the highest priorities, and
22 for us, getting the animal welfare

1 recommendations implemented, it's going to
2 take a lot of work, a lot of resources and
3 that's really going to be our focus.

4 To work on this particular issue,
5 it's not like it's not an important issue.
6 But it would take us resources, and so yes,
7 it's just a challenge when we can't get it all
8 done, and having some understanding of what
9 the priorities of the Board are for our work
10 would help us in terms of prioritizing our
11 work.

12 CHAIR RICHARDSON: Well, let me
13 try and reply to that, and I'm sure then Nick
14 will jump in, is that, you know, we kind of --
15 we did the best we could. Nick and I were on
16 these phone calls, on the working group, with
17 wonderful geneticists from APHIS.

18 We worked through these lists and
19 looked at all the little letters that say
20 whether it's an R or recombinant or vector or
21 whatever the heck it might be. Then we
22 reached and we were sort of assured by one of

1 these folks, including NOP staff, excellent
2 in-depth conversations, and we thought we were
3 making some progress and we were going to be
4 able to come up with a useful, functional,
5 boots on the ground list.

6 And then, quite suddenly, there
7 was this whoa, two things, two problem --
8 well, three problem areas. One is that all
9 the -- because all the vaccines are -- they're
10 generally done as sort of -- as groups, and
11 they change regularly in the mixes that
12 they're using around the country, slight
13 variations.

14 Even though they may all be
15 perfectly good non-GMO vaccines, it would be
16 complicated to sort of break them up into
17 their component parts and they -- and then it
18 was determined that Nick and I, as ordinary
19 human beings out here, we were the public and
20 we couldn't really have access to that
21 information which belongs to APHIS and all the
22 good folks that do the work over there.

1 So as NOSB members, we could not
2 get access to that type of information, not
3 available to us. Then you add in the bit that
4 even if you could get access to that
5 information and start creating a list, as we
6 looked into it further, the NOP staff person,
7 Scott was working on this at the time, then he
8 began to realize that the transposon issue --
9 so when we discussed that with APHIS, in terms
10 of the vaccines we, like Zea, sort of came to
11 a like, I don't know. That's kind of a gray
12 area, it really all depends. And so it was a
13 sort of impasse. We, NOSB persons, could no
14 longer really get the information we needed in
15 order to develop a list.

16 And then you come across then the
17 third sort of main factor, and that is even
18 when you do get there and they're working on
19 the list, even if we could get privy to that
20 priority CBI information from the
21 manufacturers, you're still faced with the
22 fact that the definition itself isn't a

1 workable definition for the -- for APHIS and
2 the geneticists to work with, because of the
3 lack of congruity between the way they're
4 doing it now and our NOSB definitions.

5 So from the point of view of just
6 ordinary volunteer Board members, there really
7 is not much more that we can do as a Board.

8 So it has to go back to the government to
9 begin to determine which groups of people need
10 to be brought into a group to come to various
11 agreements that are both short-term getting a
12 list and the longer-term coming up with a
13 definition of excluded methods.

14 So if I thought that we could work
15 on this, I would keep it in the subcommittee.
16 But I really can't recommend it. I mean we'll
17 be spinning our wheels, right? Nick, why
18 don't you jump in here?

19 MR. MARAVELL: Well, I'd just like
20 to add a little bit to the history here, about
21 the response of the NOSB to this issue. At
22 our Albuquerque meeting we had, you know, a TR

1 in hand on GMO vaccines.

2 We had the Livestock Committee
3 make a recommendation, a very specific
4 recommendation, to send forward to the NOP,
5 and in Board discussion, many of the incipient
6 issues that Jean has just alluded to became
7 clear, the public response it became clear
8 that the TR only went so far and that our
9 knowledge, the Board said, let's find out what
10 the shape of the beast is before we take it
11 on, and did not feel comfortable going
12 forward.

13 I think that was a wise decision,
14 rather than shooting in the dark. We really
15 did attempt to respond to the 2010 request to
16 us to provide guidance back to the program,
17 and we received public comment and we got a
18 technical review.

19 Sometimes you just can't get what
20 you'd like to get, and I think, though, that
21 with all the work that's been done, that we
22 have sort of concluded that perhaps this could

1 be an issue for poultry producers. That
2 narrows the field down quite a bit.

3 There are all sorts of other
4 issues that Jean alluded to, with the fact
5 that you stack up your vaccinations. You give
6 a six-way or a five-way or an eight-way
7 vaccine so that you don't traumatize your
8 animals. You give them one shot instead of
9 eight shots for eight different vaccinations.

10 Those are always changing, and if
11 a GMO slips into that formulation, then what
12 you thought you used last year, you can't use
13 again this year. I've got to tell you,
14 farmers, you know. They go, they get what the
15 vet says. They'll buy it off the shelf, the
16 livestock store.

17 You're not going to know, you
18 really are not going to know. So we have
19 tried our best, we really have. We took to
20 heart and it's just a very difficult situation
21 to deal with. I would say, to keep it within
22 the NOSB would be approaching the definition

1 of insanity.

2 So and I for one will probably go
3 there. Yes, so -- and we also do not have the
4 resources to go further. We would need
5 significant resources to pursue this. This is
6 a big topic. It requires a lot of technical
7 expertise. So I wish we could have gone
8 further.

9 CHAIR RICHARDSON: Mac.

10 MR. STONE: Did you learn enough
11 to know the trend? Is there -- is the
12 development going towards more propensity, if
13 that's the right word, for GMO development or
14 not necessarily or which ones are on?

15 CHAIR RICHARDSON: No, I don't
16 really think that there's a trend. I mean the
17 salmonella's the big thing. I think that if
18 there was a sudden emergency in some -- I know
19 we talked about rabies at one point as being
20 an issue, or those outbreaks of swine
21 whatever, that you might need to do something.

22 But that would be an emergency

1 situation. But by and large, no. I mean it's
2 a vast amount -- the vast number of vaccines
3 that are being used are basically traditional
4 and that's the way it's going to stay, because
5 they're very effective. Nick, you want to add
6 to that?

7 MR. MARAVELL: Yes. I think you
8 might say it's analogous to the seed
9 industry. There was a tremendous promise for
10 GMO seed development, and it's the latest
11 thing and that's where the graduate programs
12 were focused, and that's where the talent was
13 going, et cetera.

14 But then it became clear that, you
15 know, GMO seed was not the silver bullet. If
16 it was, we all would have known it by now.
17 World hunger would have gone away, et cetera,
18 et cetera.

19 And so I think we saw the same
20 phenomena going on, and we have had testimony
21 both here and in committee calls, where some
22 purveyors of vaccines have said in effect they

1 can bring a vaccine to market quicker and
2 equally as targeted without GMO technology.

3 Part of the quickness is simply
4 regulatory. They don't have the same type of
5 regulatory hurdles. So you know, it's hard to
6 say. Mac, I know you've put a lot of time and
7 effort into this too, and it depends on who
8 you ask.

9 CHAIR RICHARDSON: Yeah. I simply
10 could add that when we did a -- the ACA did
11 a survey, and certainly I got a lot of
12 feedback after the last meeting, where I'd
13 asked for feedback from farmers and from
14 certifiers.

15 I don't really find any evidence
16 of non-GMO vaccines being used. I have to
17 admit -- I mean again, I'm going to say the
18 exclusion being probably that salmonella in
19 the poultry industry. But otherwise, it
20 doesn't seem to me like it's a serious issue
21 of GMO vaccines being used, right.

22 Other questions or concerns? So

1 I'd like to see us just give it back to Miles,
2 so to speak, although that motion might be
3 worded differently for the record. He's not
4 looking in the least bit happy. So can we --
5 Madam Chair, would you like to call the
6 question?

7 MS. FAVRE: Yes. Let's call the
8 question on this, and I believe we have a
9 seconded motion currently. Let me look to see
10 who's --

11 CHAIR RICHARDSON: Yes, there was
12 a seconded motion, motion by Jean Richardson,
13 seconded by Colehour Bondera. The motion is
14 to -- the Livestock Subcommittee requests the
15 NOP review this document and provide guidance
16 to the NOSB certifiers and MROs on the use of
17 vaccines made with excluded methods in organic
18 livestock production. Want to do a roll call
19 vote? Yep. So we start with John.

20 VICE CHAIR FOSTER: Yes.

21 MR. STONE: Yes ma'am.

22 MR. FELDMAN: Yes, with two

1 reservations.

2 MR. AUSTIN: Yes.

3 DR. FULWIDER: Yes.

4 MS. SONNABEND: Yes.

5 DR. WALKER: Yes.

6 MR. MARAVELL: Yes.

7 MR. BONDERA: Yes.

8 DR. TAYLOR: Okay, yes.

9 MR. THICKE: Yes.

10 MS. BECK: Yes.

11 MS. FAVRE: Yes.

12 MR. DICKSON: Yes.

13 CHAIR RICHARDSON: Chair votes

14 yes.

15 MR. STONE: Fifteen yes, zero no's

16 or 14-1/2, Trace.

17 MS. FAVRE: Well, Miles is not

18 happy with this. Well, he can't have it all

19 his own way.

20 So thank you, Jean. We appreciate

21 that. Next on the agenda for the Livestock is

22 just a verbal update on where we stand on a

1 document that we're creating within the
2 Livestock Subcommittee to discuss.

3 We've informally called it the
4 bread crumb trail for aquaculture. Following
5 our meeting in San Antonio, which went so
6 swimmingly well, no pun intended, we
7 recognized that there was a good chance that
8 the aquaculture issue might be around and
9 causing consternation for Livestock or
10 subcommittee members, wherever it ends up,
11 long past the time that this current cohort of
12 Board members is working on it.

13 So I know in my work with
14 aquaculture, one of the things that was
15 difficult to get my head around was the
16 context of all the work that had been created
17 previously to my time on the Board, and the
18 conversations that influenced the positions
19 and the discussion and the documents and the
20 recommendations that had come from the
21 previous Board members.

22 So in an effort to sort of capture

1 that and remind us all where previous Boards
2 had been, we embarked on this effort to put
3 together this bread crumb trail document,
4 discussing sort of the history as we can
5 capture it for aquaculture to date, with the
6 idea that this document would sort of provide
7 an executive summary overview.

8 It won't have the detail probably
9 that some of you would be satisfied with and
10 would like to see. But the intent is to sort
11 of provide that reference point for future
12 Board members, as they continue to debate and
13 discuss the petition materials for
14 aquaculture.

15 We had hoped to have something for
16 us in time for this meeting. That didn't
17 happen. It's actually still in draft form
18 within the Livestock Subcommittee. The intent
19 is to make whatever tweaks we need to within
20 the Livestock Subcommittee, and then circulate
21 it more widely through the whole NOSB, in time
22 for a draft discussion document, for lack of

1 a better term, that will go out for public
2 comments, in order for folks to give their
3 feedback for the spring meeting.

4 And we chose to do the discussion
5 to document. We could have actually kept this
6 internalized, just sort of a memo internally,
7 because it really is intended to just give us
8 some oral history, written history. But we
9 wanted to provide stakeholders an opportunity
10 to weigh in.

11 At this point it's very factual.
12 It's sort of a time line. It doesn't discuss
13 the pros and cons or the wailing and gnashing
14 of teeth that went into where the
15 recommendation ended up.

16 So I'm hopeful that once we put
17 our mark onto it and it goes out for public
18 comment, that everybody will have a chance to
19 put their stamp on it. So look for that with
20 the submission of the documents in order -- in
21 time for the spring meeting.

22 That's where we stand. We wanted

1 to let people know that even though the
2 materials are currently on the back burner as
3 we discussed at the spring meeting, we won't
4 actively work on those materials again until
5 the draft standards are out.

6 But we did want to let the public
7 know that there is some recognition that this
8 has been a long time coming, and that we are
9 trying to capture the institutional memory as
10 we have it right now, and that we are doing
11 some work on it. So that's where we stand on
12 that. Madam Chair, I believe that concludes
13 the presentation on that if we want to open it
14 up for discussion.

15 CHAIR RICHARDSON: Any questions
16 to Trace on the Aquaculture report as it's
17 developing? Mac.

18 MR. STONE: I just want to thank
19 Tracy for persevering through difficult
20 conversation and then taking time to sort of
21 wrap that up and capture the questions that
22 were at the last meeting, and get those in the

1 record, because it will get cold on us. So I
2 just want to thank you for a lot of due
3 diligence.

4 CHAIR RICHARDSON: Thank you.
5 Miles.

6 MR. McEVOY: Yeah. Just to get
7 back to the recommendation on GMO vaccines,
8 thank you very much for the recommendation.
9 We'll be certainly conferring with the
10 Livestock Subcommittee as we work on that
11 guidance, so we might have further
12 discussions, so we could help to clarify where
13 the line is of what's an excluded method in
14 regards to vaccines.

15 CHAIR RICHARDSON: Thank you,
16 Miles. Jennifer.

17 DR. TAYLOR: (off mic) I know that
18 -- I looked at our document. Have you had a
19 chance to review this document that we
20 received from the Food Safety in regard to
21 pervasive impacts? But given this kind of
22 information that we see from the Food Safety,

1 that actually documents the escapes and the
2 under-reported incidents, I'm hopeful that we
3 can take this kind of information, this kind
4 of scientific information that's been compiled
5 for us about the adverse effects on marine and
6 river ecosystems and wild fish.

7 And that we could take this
8 information within the Committee and then also
9 at the program level, and call into question
10 the desirability of ocean-based fish farming
11 to be organic. I suggest that the Board take
12 an opportunity to advise the Secretary to
13 withdraw plans to go forward with the
14 regulations for organic ocean-based fish
15 farming.

16 MS. FAVRE: Thank you for those
17 comments, Jennifer. I'll remind you that we
18 were instructed by the program, at the time
19 that we undertook the materials, that the
20 standards are actually working through
21 clearance, and although we might have an
22 opportunity influence the implementation of

1 those standards through the way that we might
2 annotate materials, we don't currently have
3 the opportunity to revise the standards.

4 I'm sure under the public comment
5 period, public comment, feedback, as well as
6 our feelings from the Board, would be taken
7 into consideration by the program. So thank
8 you.

9 DR. TAYLOR: Great, thank you.

10 CHAIR RICHARDSON: Colehour.

11 MR. BONDERA: I guess to follow up
12 on Jennifer's question, I personally would
13 like a little bit more clarity, and I don't
14 know, Jean, if Jean needs to weigh in or the
15 program does. But can somebody sort of expand
16 on what you just said, I think Tracy, in terms
17 of how or if we, the NOSB, could recommend
18 reconsideration of the recommendation that was
19 made, to bring it back to a review in terms of
20 yeah, I understand that it's already been made
21 and it already has been moved forward on.

22 But if there is new information

1 and it does merit reconsideration, what is
2 that process? Is that process just us
3 responding to something once a rule is put
4 out, or does the NOSB have the capacity to
5 take some other action, to make a
6 recommendation for reconsideration of a
7 recommendation that we made in the past?

8 I would like a little bit more
9 expansion on that concept at this point in
10 time please. Thank you.

11 MR. McEVOY: Yeah. The NOSB has
12 what used to be called a work plan, an agenda
13 for the work that they're going to do in the
14 upcoming -- Mac describes it as an upcoming
15 semester or next year, and that's on the
16 agenda for discussion later today.

17 Certainly, the NOSB can come up
18 with their concepts of what they want to work
19 on, and there's the required things in terms
20 of petitions and sunsets, and there's a number
21 of other ideas that Board members feel are
22 important to work on.

1 I think in terms of aquaculture
2 particularly, and it's likely better for
3 discussion this afternoon, we do have final
4 recommendations from the Board that we're in
5 the process of writing proposed rules on.

6 They were done by the Board over a
7 period of years as a number of
8 recommendations. I think it would be not a
9 good concept to go -- to not allow us to
10 finish the process of putting out a proposed
11 rule for public comment and finish that
12 process.

13 Once that is complete, then maybe
14 that would be the appropriate time for the
15 Board to take up looking at the final work,
16 based on the recommendations that were
17 previously done.

18 MS. FAVRE: Thank you, Miles. I
19 just want to add that I can appreciate the
20 frustration of those of us that might not
21 agree with the current proposed standards that
22 came out of the Board.

1 I agree with Miles that the proper
2 vehicle by which to do that is to let the
3 process move forward, to avail ourselves of
4 the public comment period, add our voices as
5 a Board or a subcommittee with our
6 recommendations, and we said pretty clearly
7 and got the feedback from the public pretty
8 clearly at the meeting in San Antonio that the
9 materials themselves should be evaluated in
10 the framework of the standards.

11 I think we have an opportunity to
12 influence the implementation of those
13 standards through our recommendations and
14 proposals for the materials themselves to get
15 started, and that might be a more appropriate
16 vehicle for us to influence the outcome. Just
17 my opinion.

18 Are there any other questions or
19 comments on the aquaculture document?

20 (No response.)

21 MS. FAVRE: Madam Chair, that
22 concludes the Livestock Subcommittee report.

1 Thank you.

2 CHAIR RICHARDSON: Thank you. The
3 next item on the agenda is Crop Subcommittee.
4 Zea.

5 Crop Subcommittee Report

6 MS. SONNABEND: Thank you.
7 Welcome to the Crop Subcommittee. The first
8 thing on our agenda is a verbal update on
9 inerts, which will be given by Emily Brown
10 Rosen, as representing the Inerts Working
11 Group.

12 MS. BROWN ROSEN: Good morning
13 everyone. Nice to see everyone bright and
14 chipper after that exciting game last night.
15 That should put us all in a good mood today,
16 if you're on the right side.

17 All right. So we've been giving
18 an update every meeting on what's going on
19 with the Inerts Working Group, and so I'm
20 trying to get a little -- whoops, okay. Our
21 Inerts Working Group consists of these members
22 from the Board. We have Jay Feldman, Zea

1 Sonnabend, from NOP staff myself and Lisa
2 Brines.

3 And then from EPA we have two
4 people, Chris Pfeiffer and Kerry Leifer from
5 the Biopesticides and Registration Division.
6 So they have been very helpful to us.

7 This is, you know, you've seen
8 this before. But this is the chart, or a
9 little background information that's kind of
10 a complicated topic. The Organic Foods
11 Production Act does allow the use of inerts.

12 It specifically provides that
13 inerts used in pesticides may be used in
14 organic, as long as they're classified by EPA
15 as not of toxicological concern.

16 So that's basically all. It says
17 enough, but -- and that's where it's up to --
18 it's been up to the past Board and continuing
19 action as what is not of toxicological
20 concern.

21 That NOP definition is really a
22 rephrasing of the EPA definition of inert

1 ingredients, and this means it's basically any
2 ingredient that's not considered active in a
3 pesticide, that's intentionally added to a
4 pesticide product.

5 But concern from the community,
6 you know. For a long time from the
7 environmental community is that these -- some
8 of these inert ingredients in fact are not
9 actually inert. They're just not -- they may
10 have some other undesirable consequences, but
11 they're not maybe necessarily the active
12 ingredient that kills the pest.

13 So currently on our National List
14 we have an allowance on our list for inerts of
15 minimal concern, only those that are classed
16 as List 4 by EPA, and they're allowed for
17 pesticides in crops and livestock.

18 We also have a listing for List 3
19 that are allowed only in passive pheromone
20 dispensers, which would be generally like your
21 traps that are used for monitoring, or for
22 mating disruption.

1 Both of these items are subject to
2 sunset review. The List 4's are up for 2017
3 as part of the big review of 2017, and the
4 List 3's are still -- they're sunsetting the
5 following year, 2018.

6 The issue in this case is that
7 this list system, EPA class lists inerts as
8 List 1, 2 or 3, and this is an old system that
9 they have phased out. That was an initial
10 grouping, and they no longer maintain that.

11 So we are operating with this
12 list, which is just a static, obsolete list
13 that you can still -- it's still posted on the
14 Internet, but it's not being changed or added
15 to, and it was last updated by EPA in 2004.

16 And so we have manufacturers now
17 petitioning the Board. We have a number of
18 petitions sort of on hold that, you know,
19 might be better in some cases than some of the
20 ones on List 4 now. But we don't really --
21 they're not grandfathered into the list that
22 we're using.

1 So just to run through how long
2 we've been working on this. I know it's been
3 a long time. Initially, April 2010 there was
4 an NOSB recommendation, and it's always been
5 a tough issue to grapple with. But at that
6 point the proposal said we should really see
7 if EPA can help us do this review for us or,
8 if not, what would be the options for
9 reviewing and listing them directly by the
10 NOSB or proposing to list them.

11 Then 2010, we had the 2012 sunset
12 review, and none of List 4 inerts were
13 renewed, and then the following December the
14 first Inerts Working Group was established,
15 and we started meeting with EPA. At that
16 time, you know, we actively pursued the idea
17 of collaborating with EPA, and the people we
18 were dealing with on the Committee said no,
19 no, no, this is your rule.

20 It's AMS. NOP is going to have to
21 be responsible for this list, and we're not
22 going to be able to just, you know, do it for

1 you. I mean that was kind of our first line
2 of defense. Maybe they could help us do it or
3 set up a special process for us.

4 So then we went down the route of
5 -- well, there was another NOSB recommendation
6 which proposed this policy, to review all the
7 known inerts that are currently in use, group
8 them together and do technical reviews, and
9 then put all of them on the National List.

10 So we started collecting
11 information. The working group developed a
12 list of known inerts. We were able to get
13 lists of inerts that are currently going to be
14 in use, that were provided to us by a couple
15 of material review organizations without --
16 you know, without any identification as to
17 what exact products are in, just to give us a
18 snapshot at that time of what's being used,
19 and then try to develop a plan to work on
20 reviewing them and public notification.

21 This list turned out to have about
22 127 items on it. Then starting in about May

1 2013, or a little before then, we started --
2 the NOP staff started meeting with EPA staff.
3 We became aware of a different program in a
4 different branch of EPA that's called Design
5 for the Environment.

6 This is a voluntary labeling
7 program that is fairly new, and they had just
8 at that point started up with a new program.
9 They've been doing -- they set up criteria and
10 they have been developing lists of products,
11 mainly like cleaning and sanitizing products,
12 that are safer for the environment.

13 But as an offshoot of that, they
14 also developed -- they started publishing a
15 list of ingredients that they have reviewed,
16 according to a very complex and strict set of
17 standards for safety and environmental impact,
18 and this is called the Safer Chemical
19 Ingredient List, and they also have been
20 publishing criteria for this, which you can
21 all go to their website and see.

22 It's quite detailed, and right now

1 they have over 650 chemicals listed on this
2 Safer Chemical List. So we started talking to
3 them, and they're very interested in working
4 with us on this issue.

5 They actually took a look -- the
6 staff there took a look at this list that
7 we've compiled so far, and told us that at
8 least 48 of these 127 are already on this
9 Safer Chemical Ingredient List.

10 They thought that about maybe 15
11 or 20 had been reviewed or would not qualify
12 for that list, and you know, there would be
13 others they didn't know yet what they would
14 be. But there was a lot of interest there in
15 working with us. So it caused us at the NOP
16 staff to go back to our initial concept of
17 reviewing all the ingredients and doing all
18 these technical reviews and then putting them
19 on the list, and then having to -- it might be
20 a different way to handle this concern.

21 So we've been exploring with --
22 since April, this is what we've been doing.

1 We've been exploring the concept further of
2 collaborating with this group. I'll check
3 with the lawyers at OGC, just to see how they
4 felt about us having some kind of --

5 You know, how this would work out
6 in the long run, could we do this, could we
7 have a collaborative program. It took a
8 little while to get them to look at it, but
9 they agreed that this would be a very
10 worthwhile thing. It meets the overall goals
11 of streamlining government and working, you
12 know, not duplicating actions, and they
13 thought it could be very valuable.

14 So where it stands now is that
15 people, we are trying to set up a meeting.
16 The DFE people wanted more background
17 information to take to their higher
18 management, and we are planning to have a
19 meeting between a little bit higher levels of
20 AMS and EPA, and then trying to figure out how
21 this would work, get some -- you know, get
22 more ideas on paper and see if we could set up

1 a designer program and then follow through on
2 it.

3 So once we have that meeting and
4 have more information, we were planning to
5 collaborate further with NOSB, describe the
6 ideas more concretely, and discuss the
7 options, and then the logical next step after
8 that would be to provide public notice of
9 where we're headed, probably ask for more
10 information from the public and manufacturers,
11 to capture inerts that we may not have on our
12 list and find out you know what -- well just
13 also get public feedback on the whole process.

14 So it's, you know, it's kind of
15 complicated because there's a lot of moving
16 parts and steps to go through here, to make
17 some change here, and we recognize that we're
18 still also, you know, on this sunset path here
19 with inerts.

20 So in addition to that track, the
21 Crops Committee did request a technical review
22 for one of the categories that had come up on

1 this list, the nonylphenol ethoxylates or
2 they're often called NPEs.

3 So this is a group that's kind of
4 has a lot of literature published about and
5 it's, you know, of concern. So we thought
6 we'd at least get that track rolling, of some
7 inerts review, while we're pursuing another
8 option that might be an overall, maybe a more
9 balanced or more comprehensive method of
10 reviewing the inerts in inorganic production.

11 So that's my update, and I'm -- if
12 you've got any questions, I'd be happy to
13 answer them.

14 MS. SONNABEND: Thanks, Emily.
15 I'm just going to add one small point, which
16 is that over the last few years, several inert
17 ingredients have petitioned, through the
18 regular petition process, and I for one feel
19 really bad that, you know, those companies
20 which have taken the trouble to write the
21 petition and just generally disclose
22 everything about their inert, we've not been

1 able to act quicker on those, because they
2 shouldn't be -- they should be rewarded for
3 cooperating fully with the program.

4 So I've been pushing in the Inerts
5 Working Group, if there's any way we can do
6 those first or somehow, you know, get those
7 reviewed in a more timely way than the others.
8 So that's something I'm still going to be
9 aiming for, while at the same time trying to
10 make this actually happen.

11 CHAIR RICHARDSON: Nick had a
12 question.

13 MS. SONNABEND: All right.

14 MR. MARAVELL: Yeah. I was just
15 wondering, there's been a lot of work put into
16 this Inerts Working Group. So my question is
17 actually addressed to Jay, and I was wondering
18 Jay, do you think that you will be able to
19 continue or do you want to continue your
20 participation in this working group?

21 MR. FELDMAN: Well, I think it
22 would be nice for the working group to involve

1 outside people. It doesn't necessarily have
2 to be me, but I think it's a good idea. There
3 are a lot of people who could contribute to
4 this process.

5 So I'd be happy to do that, but I
6 think there are a lot of people that could be
7 chosen. I think it would be helpful to do
8 that. Zea, may I make or Madam Chair, may I
9 make a comment on this? Okay.

10 Last night we were at dinner, and
11 an older gentleman came over to the table and
12 was doing some magic tricks for us. He asked
13 Colehour to pick a card from the deck, and
14 Colehour hesitated.

15 The gentleman said "Hurry up and
16 decide before I die," and that's sort of how
17 I feel. You had to have been there, right, to
18 see this guy. He was rather elderly.

19 MR. BONDERA: He was awesome.

20 MR. FELDMAN: That's sort of how I
21 feel about this whole process, although I
22 should say I do appreciate the program's

1 receptiveness conceptually to this process,
2 and the acknowledgment that it has to be done.
3 We're struggling with getting it done in a
4 timely way, so that we can move things along.

5 One of the most important things
6 we could do right now, which wasn't really
7 mentioned here Emily in your presentation, is
8 to ask manufacturers that are producing
9 materials for use in organic production,
10 whether the list that has been generated by
11 the -- sorry, by the Inerts Working group, is
12 a complete list.

13 So that EPA does this all the time
14 as you know through data calling notices. I
15 believe it was the intent of the Inerts
16 Working Group to publish such a list, which
17 really are materials that fit into the
18 categories that were already released to the
19 public.

20 At the Providence meeting in 2012,
21 we actually in our presentation listed the
22 categories that were developed as a result of

1 that list being generated. So all we would do
2 is in a sense fill in that list, publish it in
3 the Federal Register and put out notices
4 through the certifiers, through the
5 environmental or through the organic
6 community, and request the community of
7 registrants in a sense -- these are materials
8 that are registered for the most part with EPA
9 in some way -- to help the working group and
10 thus this Board identify the list as being
11 complete or incomplete in some way.

12 In that way, when the Board goes
13 and reviews these materials in the future, it
14 knows that if it's not on this list and under
15 review, then those inerts cannot be used. So
16 you've got a finite list, and they can all be
17 petitioned and we can go through that process
18 or the Board can go through that process.

19 So I don't know if that's still
20 part of the process, Emily, and if that could
21 be expedited in some way so that when the
22 Board or when the working group is ready to

1 move on these things, it has the framework, it
2 has the full list of materials, at least, for
3 a starting point to begin the actual review.

4 MS. BROWN ROSEN: Yes. I didn't
5 explicitly say that, but you know, we would
6 have to do a Federal Register notice to
7 announce, and we haven't decided exactly what
8 format that would be. But most likely that
9 would be effective to give advance notice.

10 I think our EPA colleagues advised
11 that would be a good way to, you know, get
12 everything, you know, assure that when you do
13 get to rulemaking, that you've provided an
14 opportunity for people to come to the table.
15 I think that is a good point, yes.

16 MR. FELDMAN: Right. The other
17 thing I wanted to -- thank you -- the other
18 thing I wanted to note for the Board, you saw
19 that little colloquy we had with Neudorff
20 yesterday, the manufacturer of the ferric
21 phosphate product Sluggo.

22 That -- and you heard, this is

1 something everybody should take note of, I
2 think. You heard the manufacturer say that
3 they are searching and moving towards safer
4 inert ingredients.

5 One of the things this process
6 does and you should be aware of, and you may
7 already be, that when a Board like this
8 discusses matters of this nature in public and
9 publishes lists for public input,
10 manufacturers start voluntarily moving on
11 their own to find safer products.

12 They look for Design for the
13 Environment, they look for the 25(b) program,
14 which is a safer pesticide program within EPA.
15 They look for -- it creates incentive for them
16 to search around for safer inert ingredients.
17 So there's the regulatory part of what the
18 Board does, but there's also the public
19 conversation that has -- incentivizes
20 manufacturers to find safer materials for
21 their products.

22 So the longer this stays in the

1 Inerts Working Group, the longer this does not
2 get out into the Federal Register, and really
3 give the opportunity to the manufacturing
4 community, the opportunity to weigh in, have
5 the conversation, understand what this Board
6 passed as a matter of policy back in 2010.

7 The longer we wait on all of that,
8 the slower this process will be. So I would
9 just again really appeal to the program, to
10 bump this up as a higher priority within all
11 the other important priorities and things
12 you're doing, and move this along. Thank you.

13 MS. SONNABEND: I think what Jay
14 is suggesting is in part going to happen by
15 our commissioning the TR for the NPEs, and at
16 the point that that TR comes back, those
17 issues will very much be made public for the
18 formulating community to see that they may
19 need to start looking for alternatives.

20 It's not out of the question if
21 DFE process is slow for us to ask for TRs for
22 other groups that we've identified within the

1 process. Okay. We're ready to move on,
2 unless there's more inerts comments.
3 Colehour, you had one?

4 MR. BONDERA: Yeah. I'll be very
5 quick. I just -- I haven't been on the NOSB
6 since 2010, but when I came on, I felt certain
7 that oh, a relatively new person, Jay, is
8 participating in this. This will be done
9 before he goes off, no problem.

10 And so from my experience and
11 observation it's slow. I understand
12 bureaucratic processes. I understand these
13 governmental issues. But I'm not exactly
14 repeating what Nick was asking, but it really
15 resonates with me in terms of continuity, and
16 actually moving this process along, because I
17 think that if Jay is not continuing to be
18 involved, then some other person or other
19 organization represented in this working
20 group.

21 I just think that the learning
22 curve and the slowness, my observation and

1 experience is we're going to add a few more
2 years to this very slow process. So I really
3 encourage whoever is in the deciding
4 positions, to recognize that continuity and
5 moving forward by continuing as is viable with
6 the existing members would not slow things
7 down, but at least allow them to continue.

8 So I encourage Jay and Beyond
9 Pesticides to continue to be involved, so that
10 this doesn't keep going to quote-unquote the
11 next sunset and the next sunset, etcetera,
12 etcetera. Thank you.

13 MS. SONNABEND: Okay. Our next
14 step is our discussion document on
15 contamination issues in farm inputs. In that,
16 we turn to Jay.

17 MR. FELDMAN: Thank you. So y'all
18 have seen the document that the Crops
19 Committee's been working on, in protecting
20 against contamination of farm inputs. We
21 appreciate all the public comments we received
22 on this. This is an important topic, I know,

1 for the community.

2 So we have a short presentation,
3 which will sort of summarize what the intent
4 of the subcommittee is and some of the public
5 comments that we've received. These are the
6 issues that are driving this project, heavy
7 metal contamination of manure, compost, mined
8 minerals and fish products; neonicotinoid
9 residues that could harm pollinators when
10 taken up by plants; insecticide residue such
11 as bifenthrin that can be detected in compost;
12 excessive foreign materials in compost and
13 green waste; antibiotic residues and manures
14 that can result in tetracycline-resistant
15 bacteria; genetically engineered plant
16 material that may or may not break down in
17 compost.

18 These are important issues that
19 are out there in the environment. We're not
20 saying these are problems for the organic
21 community. However, these are issues that
22 need to be questioned or at least considered

1 in looking at inputs that organic producers
2 may choose to use.

3 The pathways for contaminants that
4 may enter the organic production system
5 products and eventually consumers, is through
6 fertilizers and soil amendments, irrigation
7 water, genetically engineered plant material
8 and contamination in the field.

9 In terms of fertilizers and soil
10 amendments, there's the potential for heavy
11 metals, pesticides, antibiotics are among the
12 contaminants that arrive in organic materials
13 used for compost and mulch. There's the
14 potential for herbicide contamination in a
15 particular problem -- or is a particular
16 problem because it damages plants.

17 Again potentially, manure from
18 animals raised in non-organic agriculture may
19 contain residues of antibiotics fed to the
20 animals that may or may not decompose using
21 compost, and contaminants may be in pesticides
22 and fertilizer products.

1 So we went out as a subcommittee
2 to seek public input in the following areas:
3 Contamination incidents in the past,
4 contaminants of concern, contamination
5 pathways of concern, expert and other
6 resources that would assist the subcommittee
7 in its goal of ultimately proposing a process
8 for addressing contamination, or I should say
9 prevention of contamination of inputs that may
10 be brought onto the farm.

11 The concept is and obviously this
12 is open to ongoing discussion, is that the
13 Crops Subcommittee would proceed by inviting
14 expert speakers to upcoming meetings of the
15 subcommittee. Between the fall, this meeting
16 and the spring meeting, the subcommittee may
17 select an area of focus.

18 At the spring -- so of all the
19 issues that were raised in these previous
20 slides, obviously the best way to go at this
21 is to identify an area of focus and begin with
22 that, and then proceed through the rest of the

1 list as necessary.

2 So at the spring 2015 meeting, the
3 subcommittee plans to present a paper
4 examining the state of knowledge on the first
5 identified focus area, based on literature
6 reviews, current practices in organic and
7 conversations with experts.

8 A discussion document and a set of
9 research priorities will accompany the paper.
10 The discussion document will pose several
11 possible strategies to the public for comment,
12 including monitoring protocols, testing
13 protocols, mitigation strategies, possible
14 annotation changes for materials.

15 These are all possible areas of
16 consideration. The subcommittee will propose
17 an approach to the priority contaminant
18 cluster utilizing input from experts.

19 Now in terms of the comments
20 received so far during this process, 15
21 organizations and 89 individuals wrote during
22 this last comment period in support of the

1 process undertaken by the Crop Subcommittee,
2 and we see here the list of organizations that
3 weighed in on this, including farm,
4 environmental, health, farm worker
5 organizations.

6 So a broad range of organizations
7 that supported the Crops and the NOSB going
8 forward with this. Then we did receive a
9 comment. As you heard in public testimony
10 during this meeting, one organization, CCOF,
11 does not support the process.

12 Quoting from their written
13 comments, "Existing organic standards,
14 certifier oversight and regulatory guidance
15 are sufficient to safeguard the organic food
16 supply from possible input contamination." So
17 that's an argument that we already have the
18 systems in place to address this issue.

19 Other comments we received from
20 Crop. "After consulting with our staff
21 agronomist, there is one more class of
22 contaminants that we are concerned about, that

1 is not addressed in the document, and that is
2 hormones.

3 "Hormone treatment in conventional
4 livestock is prevalent. We feel it is
5 something we should be concerned about,
6 particularly with manure." So another
7 possible topic for focus by the Crops
8 Subcommittee.

9 Other suggested areas of focus
10 came in. GMOs and farm inputs, specifically
11 corn gluten. GE and wheat contamination. OTA
12 mentioned seed-borne contaminants and several
13 commenters mentioned herbicide contamination.

14 This is a big part of moving
15 forward, identifying experts. The
16 Subcommittee's already identified a number of
17 experts. These are suggested additional
18 experts, with some misspellings here, sorry.
19 You can see the names there, including public
20 interest groups and university researchers,
21 and of course OMRI being a tremendous source.

22 We've already had a presentation

1 from OMRI at the subcommittee level. So that
2 concludes the presentation. Thank you.

3 MS. SONNABEND: Thank you Jay, and
4 there were two more experts recommended that
5 I think you didn't catch from NOFA Vermont on
6 their compost residue. But we'll go back and
7 capture them before the -- before we proceed.

8 MR. FELDMAN: Thank you.

9 MS. SONNABEND: Comments? Miles.

10 MR. McEVOY: Yeah. This issue of
11 contaminants in composts has been something
12 that certifiers have dealt with for a long
13 period of time.

14 When I was at Washington State
15 Department of Agriculture, we had significant
16 problems with clopyralid and Picloram in
17 compost that was affecting both organic and
18 conventional production, and there were
19 restrictions put on those pesticides, so that
20 it led to less contamination in the compost,
21 not just for organic producers but for all
22 producers in the state.

1 So I would suggest that
2 potentially the Washington State Department of
3 Agriculture, with their experience in dealing
4 with pesticide residues in compost. I know
5 California, CDFA has had similar issues in
6 some of the compost that they've had, with
7 bifenthrin residues in compost.

8 I think this is an area that we
9 might be able to really utilize the influence
10 of the NOSB to really affect some change
11 outside of just our direct authority in the
12 National Organic Program by working with EPA.

13 Because at least on the pesticide
14 contaminants, that EPA is the one that
15 registers or regulates these compounds that
16 potentially are negatively impacting
17 producers, both organic and conventional,
18 gardeners as well, and having them be part of
19 that discussion.

20 So that this information can get
21 in front of them and potentially have some
22 changes on a national level, so that we can

1 mitigate these kinds of negative impacts.

2 VICE CHAIR FOSTER: Thank you,
3 Miles. Zea, was there any further discussion
4 on this topic?

5 MS. SONNABEND: Yeah, go ahead.
6 Are you discussing?

7 VICE CHAIR FOSTER: I was just
8 stepping in for Jean while she's out, asking
9 if there was further discussion on this
10 particular topic, or if we're ready to move on
11 to the next.

12 MS. SONNABEND: So you call on
13 people? I don't call on people as chair?
14 Okay.

15 VICE CHAIR FOSTER: I'm happy to
16 do it. Nick was first, then Jennifer.

17 MR. MARAVELL: Yeah. Jay, are you
18 -- are you expecting out of this process that
19 there would be a need for a rule change or a
20 need for guidance, or you're not sure?

21 MR. FELDMAN: Not sure. I mean,
22 you know, I'm a big promoter of rule changes,

1 because that's something the Board can
2 actually influence. If there could be a
3 collaborative process with the program to come
4 up with guidance, I think ideally that would
5 be a quicker, although not that much quicker,
6 process.

7 But I think that remains to be
8 determined by the Board, as to what the most
9 efficient way to work with the, you know,
10 grower community, producer community to ensure
11 that the contamination doesn't occur.

12 VICE CHAIR FOSTER: Is that
13 Jennifer up next?

14 DR. TAYLOR: Okay, thank you. I
15 just wondered, would we also have an interest
16 in looking at the contamination impact on the
17 nutrient density? Some of the contaminants
18 are contamination through like the glycosides
19 also impact, have residue. Will then impact
20 the nutrient density of the crops, mixed
21 crops.

22 So that could be an added category

1 or if that is an added interest, as we look at
2 contamination.

3 VICE CHAIR FOSTER: More thoughts,
4 considerations, questions?

5 MR. FELDMAN: No. Jennifer's
6 suggesting that we add a category to look into
7 the impact on contaminant, I'm sorry, of
8 contaminants on nutrient density of crops, and
9 you know, that's another suggestion. I think
10 that the committee should look at that.

11 VICE CHAIR FOSTER: Thanks for
12 clarifying, Jay. Are there other questions or
13 considerations on the topic? Mac.

14 MR. STONE: We heard some pretty
15 compelling testimony a couple of days ago
16 about the impact to, in the greenhouse the
17 other day. So maybe this is one of those, the
18 gravitas of this conversation, Jay, just like
19 on -- we can have regulatory and official
20 action. But if we can elevate the
21 conversation, if Betsy in her work, Miles
22 working through the Secretary's office can add

1 that to the work with the EPA and whatever.

2 So if we have this conversation,
3 that may help faster or elevate the
4 conversation would be something we could do
5 outside of any regulatory authority.

6 The certifiers do a great job of
7 helping their clients to avoid these types of
8 things, and when clients hear the horror
9 stories like we heard the other day, I think
10 they're pretty aware of it. But if we can
11 elevate it at the national level, I think it's
12 something we can try to do.

13 VICE CHAIR FOSTER: Miles.

14 MR. McEVOY: Yeah. One more thing
15 I would add to this whole discussion with
16 contaminants in compost or other inputs is
17 that it would be nice to have the -- the
18 principle that the solution doesn't fall on
19 the backs of the organic farmers, that it's
20 not more burden, regulatory burdens on them to
21 solve this problem, that to solve this
22 problem, it really should be done outside of

1 on the backs of organic farmers.

2 VICE CHAIR FOSTER: Thank you,
3 Miles. Other comments? Seeing none, Zea, do
4 you want to move on the next agenda item?

5 MS. SONNABEND: Okay. Now we're
6 ready to start the 2015 sunset reviews, and so
7 I'm imagining the same ground rules and
8 approach as yesterday, and Jean, we don't need
9 to repeat that again, right?

10 CHAIR RICHARDSON: Right.

11 MS. SONNABEND: So we can just
12 start in with the first one, which is
13 sulfurous acid, and that would be Colehour.

14 MR. BONDERA: Okay, thank you.
15 Sorry. Jay, you need to ask Lisa to read.

16 MS. SONNABEND: Thank you. Sorry,
17 Lisa.

18 MS. BRINES: No problem. The list
19 for sulfurous acid is included on the National
20 List at Section 205.601, paragraph (j)(9),
21 listed as a synthetic substance with the
22 following list.

1 Sulfurous acid, CAS No. 7782-99-2,
2 for on farm generation of substance utilizing
3 99 percent purity elemental sulfur, per
4 paragraph (j)(2) of this section. This
5 substance was added to the National List in
6 2010, following a petition from 2008 and
7 previous technical reports are available from
8 both 2010 and 2014. Thanks.

9 MR. BONDERA: So sulfurous acid,
10 like it says, we're moving along and this is
11 pretty much what you just got presented by
12 Lisa. So our evaluation criteria we went
13 through, and like it shows, we did have some
14 public comment questioning our -- the first
15 answer, in terms of if that should be a yes or
16 a no.

17 This is what the Subcommittee
18 concluded, but it didn't work, I guess, sorry.
19 I've tried to summarize to some degree, and I
20 admit in advance that I have left things out
21 and/or chosen things that may or may not be
22 exactly what we could have. But I think that

1 my goal was to try to bring this together.

2 The Crop Subcommittee members who
3 supported a renewed listing, like it says,
4 pointed out that there are other organic
5 options, but they're not deemed as efficient
6 or as effective. The impact on crop quality
7 and potential environmental impact when using
8 alternative materials can also be a concern,
9 and that we must support, excuse me,
10 producer's needs.

11 Members who opposed the renewed
12 listing identified that it can be -- sulfuric
13 acid can be substituted with alternatives,
14 including cultural practices and biological
15 controls, that since it's a synthetic product
16 and a tool designed for non-organic
17 agriculture, it's not consistent with organic
18 or sustainable production systems, and the
19 quote-unquote need may reflect unsustainable
20 farming practices.

21 And although we have received
22 public comment and it's true that there is

1 some international standards that do allow
2 sulfurous acid in crop production, that
3 generally speaking that's not the way it is.

4 You know, we have gone through
5 this process for the previous meetings, so the
6 initial posting had eight comments, and I
7 hesitate to even point out numbers, because
8 I'm not going to be exact.

9 But we had the comments in favor
10 of relisting and comments opposed to relisting
11 of sulfurous acid. Like I said, that's sort
12 of the ratio. The second review or second
13 posting, however we want to characterize this
14 process, didn't really affect the content of
15 what we were presenting.

16 However, I estimated that there's
17 over 24 comments favoring relisting, and I'll
18 point out we all received on our table here
19 the results of a survey from quoting more
20 exact numbers of producers that are favoring
21 relisting.

22 But I just -- you know, and we

1 received a number of those opposed to
2 relisting like we had. But we also received
3 over a 100, and again I'm not going to cite
4 who's counting how, that requested that the --
5 so quite a number, a significant number, that
6 requested a recommendation be sent back to the
7 Subcommittee and reconsidered, rather than
8 move forward given the process at hand.

9 Some of the public comments, and
10 again this is a somewhat randomized sampling,
11 so I'm not going to be able to quote or cite
12 all of them. But just I chose a few that I
13 thought were characteristic or important
14 enough public comments that came in.

15 From CCOF: "Sulfurous acid is
16 necessary to California organic crop
17 production, and severe drought heightens the
18 need for sulfurous acid in California."

19 Again, that's California certified organic
20 farmers. So that's focusing on that topic.

21 We heard testimony, live testimony
22 from Reiter Brothers, from Abernathy, and he

1 said in his written: "Sulfurous acid benefits
2 our plants and soils. It's not a fertilizer,
3 but it allows our fertilizers to be more
4 effective by improving our water and soil
5 quality."

6 So I think that those are relevant
7 and important, and you know, to add to what I
8 already said, this survey from Organic Trade
9 Association points out that responses came
10 from western United States, Mexico and Saudi
11 Arabia.

12 I think when I was putting this
13 together and looking at -- this is the results
14 of their survey but, you know, I was noticing
15 that a lot of the comments had come from the
16 -- the written comments we received had come
17 from California. I'm going to get the states
18 wrong, but they were western states, all of
19 them, Utah.

20 So I think, you know, pointing out
21 that it includes Mexico and Saudi Arabia is
22 not unimportant. Public comments against

1 relisting. Cornucopia said "More research is
2 needed to understand its modes of action in
3 different soils. The potential emissions of
4 sulfur dioxide into the air and the
5 occupational safety hazards of sulfur
6 burners."

7 That goes back to that comment
8 that I made, in terms of impacts on human and
9 environment, which I think is not irrelevant
10 to consider. Its manufacture is fossil-fuel
11 dependent. Quote-unquote "Enables
12 unsustainable agricultural practices to
13 continue." That comes from Cropp Cooperative.

14 And from CATA, Farmworkers Support
15 Committee: "We urge the NOSB to refer the
16 motion back to Subcommittee, based on the lack
17 of supporting rationale." So I just say all
18 of that to show you that there's a range of
19 understandings and consideration at hand, and
20 I'm going to wrap this up.

21 But I do want to, you know, just
22 summarize what the Subcommittee did in this

1 process. Like it says in what you received,
2 based on the Subcommittee's review, the
3 Subcommittee proposes removal of the substance
4 from the National List, based on the criteria
5 that were cited, 6158(m)(7), its compatibility
6 with a system of sustainable agriculture.

7 So there was a motion to remove
8 sulfurous acid from the National List, and
9 there's the vote. Four were for that, three
10 were opposed to that, and I think I just want
11 to share with you, and it also is in what we
12 distributed, but I don't have it up on a
13 slide.

14 But I just want to read to you the
15 minority statement on -- because when you look
16 at that vote, you know, that's a tight vote.
17 The minority statement was "While the minority
18 of the Crop Subcommittee agrees with the
19 majority, that the full NOSB should vote on
20 sunset materials, in voting against the motion
21 it is following what we believe are a required
22 procedure of AMS, USDA, as established by the

1 September 16th, 2013 Federal Register notice,
2 which states that motions to remove be
3 justified by criteria established by OFPA.

4 "Because of concerns that a change
5 in NOSB procedures should be disclosed to the
6 public before taking effect, the minority does
7 not accept the compatibility criteria from
8 U.S.C. 6158(m)," what I already cited, "that
9 was provided in this case."

10 "Furthermore, AMS NOP has said
11 that no action by the NOSB maintains the
12 sunset material on the National List." So I
13 just feel that it's worth considering the fact
14 that I think like our chair Zea said, you
15 know, are we looking at the material, or are
16 we contemplating the reality, which is the
17 process that we are engaged in?

18 I personally feel that we can't do
19 them in an isolated manner. So my final
20 slide, I think, speaks a plethora for it,
21 which is enjoy the sunset.

22 VICE CHAIR FOSTER: Beautiful.

1 MR. BONDERA: Thank you.

2 MR. McEVOY: Point of
3 clarification, that the last statement is not
4 accurate, that no action by the NOSB, the
5 material would sunset and be invalid.

6 MR. FELDMAN: Madam Chair, I rise
7 to a parliamentary inquiry?

8 CHAIR RICHARDSON: Please.

9 MR. FELDMAN: It's friendly.

10 CHAIR RICHARDSON: Be friendly.

11 MR. FELDMAN: It's friendly. I
12 just want the Board, the question I'd ask you,
13 Madam Chair, is whether the person making the
14 motion, in this case a motion to remove, can
15 speak against his motion.

16 So in this case, John Foster made
17 the motion in Subcommittee to remove this
18 material from all discussions in subcommittee.
19 It was clear that John did not support the
20 removal of this material, and it would be
21 improper at this time for the maker of the
22 motion to speak against the motion. Robert's

1 Rules of Order, page 393, lines 19 through 26.

2 CHAIR RICHARDSON: Yes, you're
3 correct. So in order to do this, you would
4 need to put forward a new motion.

5 MS. SONNABEND: But he hasn't
6 spoken against the motion.

7 MR. FELDMAN: He hasn't spoken
8 against it.

9 CHAIR RICHARDSON: He hasn't
10 spoken against it, this is true. But you
11 could withdraw the motion and start again with
12 a fresh motion if you wanted to. You don't
13 want to do that?

14 MR. FELDMAN: No.

15 CHAIR RICHARDSON: You just don't
16 want him to speak against the motion. Very
17 good.

18 MR. FELDMAN: Sorry John.

19 CHAIR RICHARDSON: Zea and then
20 Nick.

21 MS. SONNABEND: I would just --
22 since we're in discussion, this is a point of

1 discussion. I would like to point out that it
2 seems incredibly hypocritical that the
3 minority would question the compatibility
4 motion as being -- the compatibility criteria
5 as being valid, when almost all of the
6 evidence presented by the minority highly
7 questions the compatibility criteria and the
8 compatibility of this material.

9 So I entirely think that the issue
10 of compatibility in this case is well-
11 supported in the summary document, and is a
12 valid criteria to consider removal from the
13 National List. If you're not going to vote to
14 remove it, that means you think it's
15 compatible, and so therefore your vote is on
16 the record as such, should you choose to do
17 that.

18 CHAIR RICHARDSON: Nick.

19 MR. MARAVELL: Yes. Taking a
20 refrain from last night at our dinner, I'm a
21 little bit older than you are, Colehour and
22 Zea, and before I die, I would just like to

1 know, maybe under the old system or whatever,
2 what did the Subcommittee really think and who
3 was supporting a removal from the National
4 List?

5 Or not who, but I mean what was
6 the sentiment? I'm confused.

7 CHAIR RICHARDSON: Well let's just
8 first start with the motion on the floor.
9 There is a motion on the floor, which was made
10 by John Foster, seconded by Harold Austin, to
11 remove this material from the National List.

12 So if we could then go back and
13 perhaps ask the -- does the chair want to do
14 this, Zea, to discuss the scope of discussion
15 and what that vote actually meant? Zea.

16 MS. SONNABEND: Okay. I think I
17 -- I think the whole committee believes that
18 the full Board should be voting on sunset
19 materials.

20 Miles told us at the spring
21 meeting that the only way to do that, and he
22 actually said it again yesterday, the only way

1 to do that is to bring a motion to remove
2 before the Board, the full Board.

3 So in order for the full Board to
4 be able to vote, we have brought a motion to
5 remove before the full Board. The fact that
6 the minority did not like this procedure led
7 them to vote against it. But then they put
8 this minority opinion, because they wanted --
9 they thought they wanted to make it clear that
10 they supported voting before the full Board,
11 but they just didn't think this was the way to
12 do it.

13 But this is the way we've been
14 given to do it. So allowing my statement, I
15 said yesterday this is what we're doing.

16 CHAIR RICHARDSON: Nick.

17 MR. MARAVELL: What I'd like to
18 avoid -- thank you Zea -- is let's say John
19 wants to contribute to this conversation, and
20 yet it would appear that he would not be able
21 to. I would think that the same would
22 probably apply to Jay, no, because Jay voted

1 in a different way.

2 But what I'm saying is have we
3 muzzled ourselves here? I mean I would really
4 like to hear the full texture of the
5 Subcommittee deliberation, because as you can
6 see from the public comments, this raises some
7 very important issues.

8 It's a very difficult decision to
9 make, and I'm just not really clear where the
10 Subcommittee comes out on the substance. I
11 think what we have here is process colliding
12 with substance. Is there some way to get to
13 the substance?

14 CHAIR RICHARDSON: Harold.

15 MR. AUSTIN: Okay. As the
16 individual that seconded the motion, I am
17 allowed to speak, according to Jay, right.
18 Okay, all right. The Crops Committee on this
19 motion, this was actually one of the first
20 materials that we came -- we had to come to
21 grasp with the new process.

22 And I think as we talked a little

1 bit yesterday, there's a lot of wrinkles that
2 we need to take and try to figure out how to
3 do this in a way that makes it clearer, a lot
4 more clarity, so that the audience understands
5 what we're talking about, the public
6 understands, but more importantly the Board
7 understands.

8 So that when we're in this
9 position, that we have an idea. This was one
10 of the first ones, and so I think, as I
11 alluded to yesterday, we kind of changed on
12 how we voted during the Handling
13 Subcommittee's presentations, so that our
14 votes more reflected the overall sentiment of
15 the Subcommittee.

16 We did not have that luxury in
17 Crops, because Crops, this was our first
18 attempt to deal with it. While I have the
19 mic, I will say that this particular material,
20 I think we've heard a lot -- we are into
21 discussion at this point, are we not Madam
22 Chair?

1 We've heard a lot of discussion in
2 support of this material. I think the overall
3 sentiment of the Crops Subcommittee was that
4 -- from the majority position was that this
5 material was needed. I think it's a great
6 example of something that has been allowed for
7 use, that really does take and coincide with
8 the very basic fundamental feel, what we
9 really look at when we're talking about
10 organic, and that's soil health.

11 Because everything that we do,
12 organically out on the farms, begins with the
13 health of the soil. At the end of the day, we
14 want to improve it. We want to leave it in a
15 better position and condition than it was when
16 we started.

17 This is a material that does
18 afford the farmers in the drier western areas
19 and some of the south as well, that
20 opportunity. With the waters and the soil
21 conditions that we have, it's very difficult.
22 A lot of our water pH is 8.2, 8.3. Our soil

1 is 7.5 to 7.8.

2 This material, as we've heard
3 through written public testimony on oral
4 presentations yesterday, helps to alleviate
5 some of those difficulties that the growers
6 are faced with. So for me, as the second of
7 the motion, I'm going to vote against the
8 motion, because I think this is something that
9 should stay on the National List, for the
10 growers to be able to continue to utilize.

11 CHAIR RICHARDSON: Mac.

12 MR. STONE: Nick, I think some of
13 the confusion is the quote "minority opinion
14 actually voted -- there were more votes in the
15 minority opinion," and that's where it gets
16 confusing here when I analyze this, what we
17 get here.

18 But we're allowed to use sulfur
19 and pH for blueberries, and this seems like a
20 -- from what I hear, it's a viable way to
21 manage soil fertility in these alkaline soils.
22 I too intend to vote no, to allow it to stay

1 on the list.

2 CHAIR RICHARDSON: Francis.

3 MR. THICKE: As a member of the
4 Crops Committee and as a soil scientist, my
5 analysis is that we've got to remember first
6 of all we're farming. This is being used for
7 farming in desert conditions using alkaline
8 water. Now we can argue whether or not we
9 should farm in deserts.

10 But if we're going to farm in
11 deserts under these conditions, then this
12 product will make farming more sustainable,
13 because it will help improve soil quality. It
14 will help improve plant quality, and it will
15 help reduce the number of inputs needed. So
16 I'm going to vote to list it, to relist it.

17 CHAIR RICHARDSON: Other
18 questions, comments? The motion on the --
19 yes, Carmela.

20 MS. BECK: In line with Francis
21 and Harold, I firmly believe that it
22 contributes to sustainability, and that it

1 complies with the OFPA criteria. I think we
2 heard substantial testimony from growers,
3 attesting to the need for this product, and
4 that -- again that it only contributes to the
5 soil. Thank you.

6 CHAIR RICHARDSON: Other comments
7 on the motion on the floor? Nick.

8 MR. MARAVELL: This product was
9 added in 2010 to the National List. I was
10 just interested in the Subcommittee's
11 assessment or impression, what sort of change
12 have we seen? What happened before 2010 and
13 what is happening now after 2010?

14 I understand the soil chemistry
15 works. I understand that, but what was -- is
16 there any qualitative difference for the
17 organic community pre-2010, when this material
18 was not approved and now? In other words,
19 what are we seeing as an overall difference,
20 because there are -- there were many comments
21 raised about, you know, how this fits into an
22 overall picture of agriculture.

1 CHAIR RICHARDSON: Zea.

2 MS. SONNABEND: Yes, I can address
3 the answer to your question. When before the
4 NOP rules came in and this technology was just
5 starting to be adopted, we looked at it in
6 CCOF as the machinery, not as an input.

7 So we -- and since it was sulfur
8 and since sulfur was allowed for other uses,
9 we had approved it. When we got issued a non-
10 compliance by the early NOP, and we had to
11 tell a grower who had made a big investment in
12 the machines that they had to stop, and at
13 that point, the petition was developed.

14 At that point, not wanting to have
15 unfair competition, we pointed out that
16 Washington State, where Miles was in charge,
17 also allowed it, so they had to stop allowing
18 it also. But to the extent that it had not
19 been ruled on by certifiers but was shown to
20 be beneficial, that's what happened.

21 VICE CHAIR FOSTER: Thank you,
22 Zea.

1 MR. McEVOY: I'd just like to add
2 to that that I think that it might be similar
3 on the international standard that was noted.
4 As we saw with the biodegradable mulch
5 situation, under the European organic
6 standards, they don't specifically have
7 biodegradable mulch listed.

8 But biodegradable mulch is allowed
9 in a lot of European organic farming systems,
10 because of the different way that they look at
11 materials and substances. So I think that we
12 could go back and check with the EU
13 Commission. But I would guess that the way
14 that they're going to look at it is that this
15 is a water treatment.

16 It's not applied to the field, so
17 therefore it doesn't have to be on their
18 particular list. That's how some certifiers
19 were looking at it before the NOP ruled on
20 this in the mid-2000's.

21 CHAIR RICHARDSON: Harold. We are
22 running late. I should just point that out to

1 everybody.

2 MR. AUSTIN: Okay. Just briefly
3 also, to help answer Nick's question. With
4 the addition of this to the list, and the
5 ability for the growers to be able to utilize
6 it, it's reduced the amount of physical inputs
7 that have had to be used in place of this,
8 reduction of the amounts of citric acids,
9 soil-applied sulfur, a lot of different things
10 that have happened, because this really truly
11 is a water treatment.

12 So by being able to treat the
13 water, we're also treating the soil at the
14 same time. It's allowed for increased --
15 especially for blueberries and some of the
16 tree fruit, it's allowed for an increased
17 amount of acreage to transition and move into
18 the organic status, rather than the
19 conventional.

20 So it has helped grow the organic
21 farming segment in those crops, by the ability
22 to be able to treat the water and be able then

1 to compete, and without all of the inputs. It
2 really truly is environmentally a significant
3 step in the right direction from plant health,
4 soil health.

5 CHAIR RICHARDSON: Jay.

6 MR. FELDMAN: The Crop
7 Subcommittee did review the material as
8 required in the Federal Register notice
9 September 16th, 2013. I concur with the
10 minority opinion, that that review was
11 sufficient for the Subcommittee not to act on
12 that material, but to simply review that
13 material.

14 By not acting, I'm referring to
15 adopt a motion. Therefore, it's not required
16 that the full Board act on that motion, except
17 to accept the review and consider the review
18 of the Subcommittee. Therefore that no
19 action, meaning no motion is required at the
20 full Board level. I just want to clarify that
21 for the program.

22 Given that there was no

1 justification provided for the criterion that
2 was cited here in the majority position, I
3 can't -- I don't see this process as
4 fulfilling the requirements as outlined in the
5 Federal Register notice.

6 Although I see this material as
7 relatively innocuous, and having great benefit
8 as we've heard over the last several days, in
9 my mind this is a classic example of the need
10 for a rigorous sunset process, so that growers
11 can come back on a five-year basis and share
12 with the NOSB what is happening, and the
13 public can know that the review of that
14 material is going to be the most rigorous, and
15 the public can be assured that all the
16 stakeholder groups have come together, through
17 a sunset process that requires a vote by the
18 full Board to relist the material.

19 For that reason, Madam Chair, I
20 will be voting against this. My vote, I
21 realize, will not hurt or have any negative
22 impact on growers that are currently dependent

1 on this, and for that I am grateful.

2 CHAIR RICHARDSON: Zea.

3 MS. SONNABEND: I would just like
4 to point out that I couldn't disagree more
5 with Jay about the criteria not being
6 provided. In the motion to remove the lack of
7 satisfying OFPA criteria, 6158(m)(7), which is
8 compatibility with a system of sustainable
9 agriculture.

10 On the evaluation checklist
11 provided by the minority, the box for
12 compatibility and consistency is checked "no."
13 Thus supporting this criteria being put
14 forward in the motion to remove.

15 CHAIR RICHARDSON: The motion on
16 the floor is to remove sulfurous acid from the
17 National List. Are there further questions?
18 Nick?

19 MR. MARAVELL: Zea, just to
20 clarify. Are you saying that the checklist
21 that we're looking at is the minority
22 position?

1 MS. SONNABEND: Yes.

2 MR. MARAVELL: Could I hear from
3 the minority? Is that your understanding?

4 MR. FELDMAN: Yes. The minority
5 developed that information as part of the
6 deliberations in the Subcommittee, and there
7 were issues of compatibility in agricultural
8 systems, as outlined in the checklist.

9 MR. BONDERA: I'm sorry. In
10 development of the --

11 CHAIR RICHARDSON: Colehour.

12 MR. BONDERA: I'm sorry, thank
13 you. In development of the checklist, which
14 went through the whole subcommittee, was
15 reviewed by the whole subcommittee and we
16 could have changed the checkboxes, upon
17 discussion, that was what was presented to the
18 Subcommittee and after the fact, it turns out
19 you're referring to minority or majority votes
20 that occurred after the checklist was
21 prepared.

22 It's not as if the checklist was

1 prepared by a certain group of people after
2 the vote happened. So I just want to make
3 sure that this process is represented
4 accurately, which is that the checklist was
5 prepared, and I was responsible for preparing
6 the checklist, and it turns out that my vote
7 is in the minority.

8 But the checklist isn't
9 representative of the minority position per
10 se. It wasn't questioned or changed by
11 anybody who voted in the majority. So I think
12 we're getting very lost in process here. I'm
13 sorry, Zea. You added to that by saying
14 that's the minority opinion.

15 That's not accurate. It's the
16 Crop Subcommittee's position, and the
17 checklist that we, the Crop Subcommittee,
18 prepared. Yes, I took the lead on that, but
19 that doesn't mean it's my positions. Thank
20 you.

21 CHAIR RICHARDSON: The motion on
22 the floor is to remove sulfurous acid from the

1 National List. I sense we might be ready to
2 vote. Mac.

3 MR. STONE: No ma'am.

4 MR. FELDMAN: Yes.

5 MR. AUSTIN: No.

6 DR. FULWIDER: No.

7 MS. SONNABEND: No.

8 DR. WALKER: No.

9 MR. MARAVELL: I abstain. I don't
10 quite understand what I'm voting on.

11 MR. BONDERA: Yes.

12 DR. TAYLOR: Yes.

13 MR. THICKE: No.

14 MS. BECK: No.

15 MS. FAVRE: No.

16 MR. DICKSON: No.

17 VICE CHAIR FOSTER: No.

18 CHAIR RICHARDSON: The chair votes
19 no.

20 (Pause.)

21 MR. STONE: I have three yes, 11
22 no's, one abstention, and even with the

1 abstention, there are still ten votes
2 necessary, and we achieved 11. Motion fails.

3 CHAIR RICHARDSON: Okay. I
4 suggest we take a 15 minute break at this
5 point. Come back at quarter to 11:00. We are
6 running, I would say, depending on how the
7 following discussions go, I would say at least
8 half an hour behind our schedule. See you
9 back here at quarter to 11:00.

10 (Whereupon, the above-entitled
11 matter went off the record at 10:31 a.m. and
12 resumed at 10:46 a.m.)

13 CHAIR RICHARDSON: If we could
14 take our seats please.

15 [TRUMPET PLAYING.]

16 CHAIR RICHARDSON: All right. On
17 that wonderful note, I would like to move us
18 into this continuation of the Crop
19 Subcommittee, and right before we take up the
20 next set of materials, I would like to have
21 Deputy Administrator McEvoy introduce the
22 fourth of the new upcoming NOSB Board members.

1 I believe Paula is here in the room. Miles.

2 MR. McEVOY: Yeah. I have the
3 pleasure to introduce Paula Daniels, who's
4 been appointed to the National Organic
5 Standards Board starting in January of 2015.
6 So welcome Paula. If you could introduce
7 yourself to the Board. Thank you.

8 MS. DANIELS: Hello, and thank you
9 for having me here. It would be a great
10 pleasure to be part of a Board that has such
11 musical talent in commencing its meetings.
12 But I really am delighted to be here and be
13 part of this Board meeting.

14 It cannot go without notice that
15 there are about 60,000 Future Farmers of
16 America in Louisville, Kentucky today, and one
17 of the things that made me think about that in
18 relationship to this Board is that most of the
19 meetings that they're in are about marketing.

20 Then, you know, with all the
21 marketing meetings that they have and the
22 marketing plans that they're developing about

1 agriculture, to have the National Organic
2 Standards Board meeting down the hall I think
3 is of interest.

4 A lot of people think of organic
5 in many ways. One way that they think of it
6 as a way to market or at least to help people
7 understand what is -- how the food is
8 produced. That is something for sure that
9 America cares about.

10 Given the fact that organic has
11 grown in the way that it has over the years,
12 people care about how their food is produced,
13 as you all know. What they don't know about
14 is what goes into the decision-making of what
15 makes something organic, a label which is
16 pretty highly trusted.

17 The fact that you're having these
18 discussions here and the way they're taking
19 place, and the discussions that take place
20 everywhere from the barns to the ballrooms
21 here are a part of democracy that I really
22 cherish.

1 The ballroom discussion is only
2 one part of all of it, and it, you know, deals
3 with so much that people that are buying
4 organic and look at it as a label that helps
5 them understand what's happening. They don't
6 understand the discussions that are going on
7 in this room, but they're pretty significant,
8 and the struggle is valiant.

9 There's a quote that I have here,
10 that I just learned on Tuesday when I was in
11 Los Angeles, from the Mayor of Curitiba,
12 Brazil. "Better the grace of imperfection,
13 than perfection without grace." So the
14 struggle here, the devil in the details, I
15 think, is pretty important. The details show
16 quite a bit of deep philosophy at work, and
17 I'm privileged to be a part of it.

18 My background is that I'm with --
19 or had been, at least in terms of food policy,
20 with the Mayor's office, the Mayor of the City
21 of Los Angeles, and helped develop the Los
22 Angeles Food Policy Council, in which we were

1 bringing together the different groups from
2 across the food systems, farmers that are in
3 production, people from the Farm Bureau,
4 people in retail, people who care about food
5 security, all of the people across that
6 spectrum, all of which have different points
7 of view, but all of whom are struggling pretty
8 valiantly towards the same thing, which is a
9 healthy food system, and that's what this
10 organic, National Organic Program, National
11 Organic Standards Board is about. It's a very
12 righteous struggle.

13 And some have asked me how is it
14 that I come to this. I think you could say
15 maybe it came from starting the food policy
16 framework for the City of Los Angeles and
17 showing how an urban area hopefully can be a
18 leader in sustainable food production and
19 healthy food and good food for all, in a
20 region that produces quite a bit of it.

21 But I would say honestly, it came
22 to me probably from the time I was young, and

1 the fact that my family was raised -- we're
2 from Hawaii, and my father grew up on a sugar
3 cane plantation. I'm part Native Hawaiian,
4 and agriculture is a deep part of our family
5 history.

6 This struggle is righteous.
7 There's that word in Hawaii that Colehour
8 might know. Pono, which means righteousness,
9 integrity of action, and the motto of Hawaii
10 is something I just want to say hello to you
11 all with, because I think this is what this
12 struggle is about.

13 It is "Ua Mau ke Ea o ka Aina i ka
14 Pono." The life of the land is preserved in
15 righteousness. To me, that's what this
16 program is about. It's about the life of the
17 land, the sustainability of production
18 methods. "Ua Mau ke Ea o ka Aina i ka Pono."
19 Thank you for having me here, and I really
20 look forward to being part of this group.

21 (Applause.)

22 CHAIR RICHARDSON: Okay, great.

1 Before we go back to the Crop Subcommittee --
2 well, part of the Crop Subcommittee, as chair,
3 let me just state the following from Robert's
4 Rules of Order No. 40.

5 "By taking advantage of
6 parliamentary forms and methods, a small
7 minority can disrupt the business of a
8 deliberative assembly, having short sessions,"
9 which is what we have, and further that "using
10 parliamentary forms merely to obstruct
11 business, he or she should -- the chair should
12 rule them out of order or refuse to recognize
13 them."

14 So Robert's Rules has provisions
15 for some of the discussions that we're
16 struggling with over the last -- the
17 discussion of the last material. I enormously
18 respect Jay and all that he does, and I also
19 believe that there are clarifications that are
20 needed in the sunset process.

21 I think the discussion over the
22 last material and the discussion we had

1 yesterday on sunset is sufficient to indicate
2 that there are things in the process that need
3 to be clarified.

4 So I would very much appreciate it
5 if for the next two substances that we have to
6 look at, if we could refrain from dealing with
7 the process. The same issues are there, in
8 effect, and we just don't need to hash them
9 out, belaboring an obvious point.

10 I would prefer it very much if we
11 could stick to a discussion of the substance
12 of the motion, which is the substance material
13 that we're looking at. Over to you, Zea.

14 MS. SONNABEND: Thank you. The
15 next material on our agenda is sodium
16 carbonate peroxyhydrate, which doesn't lend
17 itself to a concise set of initials, but maybe
18 SCP, if we have to. Lisa.

19 MS. BRINES: Thanks, Zea. The
20 listing for sodium carbonate peroxyhydrate is
21 currently included on the National List as a
22 synthetic substance at Section 205.601(a)(8).

1 It's listed as follows:

2 "Sodium carbonate peroxyhydrate,
3 CAS No. 15630-89-4. Federal law restricts the
4 use of this substance in food crop production
5 to approved food uses identified on the
6 product label.

7 "The substance was added to the
8 National List in 2010 following a petition
9 from 2005, and in support of the review, there
10 are two technical reports available, one from
11 2006 and a newer edition from 2014." Thank
12 you.

13 MS. SONNABEND: Thank you, Lisa.
14 Okay. This material is a combination of
15 hydrogen peroxide and sodium carbonate, and
16 it's primarily used in ponds, irrigation lines
17 and in rice paddies to control algae. A new
18 TR was commissioned in 2014 to address some of
19 the alternatives and the use patterns of it,
20 because it had only been newly registered for
21 use in rice at the time it was first added to
22 the National List.

1 So there was not very much
2 previous experience with it, and we were
3 seeking in our first posting to get more
4 information on the subject, and also in the
5 TR. The TR did come up with some
6 alternatives, primarily from information from
7 other countries.

8 But of course the main alternative
9 in this country is the use of copper sulfate
10 or bluestone for control of algae in rice. We
11 received very little public comment directly
12 on the subject of the material, either for or
13 against.

14 We received additional information
15 from the petitioner, which addresses some of
16 the issues around alternatives, and also gives
17 some more efficacy information and other
18 information which I'm sure you all had the
19 opportunity to read in your packet.

20 Then we received some information
21 reposted from the first time, which we
22 addressed in our summary, and then some people

1 procedurally wanting to take it off the list
2 or to refer it back to Committee.

3 We did receive no comments from
4 users. Although CCOF shows 34 clients have it
5 on our OSP and we urged them several times to
6 turn in comments, but I think people are
7 reluctant to comment, seeing that their
8 comments have not -- they don't see any
9 results from their comments in the past. So
10 I think that they are somewhat reluctant to
11 comment.

12 In any event, new information
13 beyond what is in the summary was not
14 presented that was not procedural, and I feel
15 that we would be ready to proceed, based on
16 the information that we have. So a motion has
17 been put on the floor, and let's see. I have
18 to go back to my other thing.

19 The motion to remove, as we are
20 doing customarily, that based on our review,
21 the Subcommittee proposes removal of the
22 substance from the National List, based on the

1 following criteria in the Organic Foods
2 Production Act, 7 U.S.C. 6158(m)(7), the
3 compatibility with system of sustainable
4 agriculture.

5 The majority of the Subcommittee
6 found no concerns regarding the continued
7 listing of sodium carbonate peroxyhydrate, but
8 feels that the whole NOSB needs to consider
9 and vote on each material. So this motion is
10 put forward by me and seconded by Harold.

11 CHAIR RICHARDSON: Motion is on
12 the floor to remove whatever it is, carbonate
13 -- sodium carbonate peroxyhydrate.

14 Discussion.

15 (No response.)

16 CHAIR RICHARDSON: No discussion
17 on this substance. We can move to vote on it.
18 Is that correct? The first person will be
19 starting, Jay.

20 MR. FELDMAN: Yes.

21 MR. AUSTIN: No.

22 DR. FULWIDER: No.

1 MS. SONNABEND: No.
2 DR. WALKER: Yes.
3 MR. MARAVELL: Yes.
4 MR. BONDERA: Yes.
5 DR. TAYLOR: Yes.
6 MR. THICKE: No.
7 MS. BECK: No.
8 MS. FAVRE: No.
9 MR. DICKSON: No.
10 VICE CHAIR FOSTER: No.
11 MR. STONE: No ma'am.
12 CHAIR RICHARDSON: Chair votes no.
13 (Pause.)
14 MR. STONE: Five yes, ten no,
15 motion fails.
16 MS. SONNABEND: Thank you. Our
17 next material is aqueous potassium silicate,
18 which will be presented by Jay, but first Lisa
19 will tell us about it.
20 MS. BRINES: Thanks. There are
21 two listings for aqueous potassium silicate
22 that are under consideration under 205.601.

1 One listing at paragraph (e) as insecticides,
2 including acaracides or mite control, and one
3 listing under paragraph (i) as plant disease
4 control.

5 Both listings are identical and
6 read as follows: "Aqueous potassium silicate,
7 CAS No. 1312-76-1. The silica used in the
8 manufacture of potassium silicate must be
9 sourced from naturally occurring sand.

10 "The substance was added to the
11 National List in 2010 and there are two
12 technical reports available, one from the
13 original review in 2003, and a new report that
14 was developed in support of this sunset review
15 for 2014." Thank you.

16 MR. FELDMAN: Thank you. I guess
17 this is somewhat repetitive, but anyway two
18 listings that the Subcommittee is looking at:
19 601(e) as insecticides, including acaracides
20 or mite control. Aqueous potassium silicate,
21 the silica used in the manufacture of
22 potassium silicate must be sourced from

1 naturally-occurring sand, and 601(i), as a
2 plant disease control. I won't read the rest
3 of that.

4 Summary overview here is uses as
5 insecticide, acaracide and plant disease
6 control listings. We've already mentioned
7 technical reports in 2003 and 2014.
8 Petitioned originally in 2006. Passed NOSB
9 actions. The NOSB review and recommendation
10 for addition to the National List in 2007.

11 Regulatory background. Proposed
12 rule, including justification, was published
13 in '09, and added to the National List in
14 2010. So the sunset date is the end of next
15 year.

16 We received some public comments.
17 One grower and CCOF, so you did get one grower
18 out there. We got -- we received some in
19 opposition to the renewed listing, three
20 organizations and five individuals. Public
21 comments that came in included these topics.
22 When APS enters the soil from plant treatment,

1 it is indistinguishable from silicates already
2 present in the ground.

3 APS is used as a foliar
4 application not for roots. Management systems
5 can be used to build the silicate in the soil,
6 to improve the plant's resistance to disease
7 and reducing the likelihood of needing a
8 pesticide treatment.

9 However, when an infestation
10 occurs and a treatment is required, APS should
11 be an available option for organic growers.
12 Information is needed on accumulation of
13 silica in plants. International standards do
14 not allow aqueous potassium silicate in crop
15 production. Organic methods and soil
16 conservation make its use unnecessary.

17 The majority opinion held that, as
18 Zea already stated, the Crop Subcommittee
19 believes that the full Board should have an
20 opportunity to vote, and if the motion to
21 remove fails to receive a majority, the motion
22 will still be put forward to the full Board

1 for review.

2 The motion to remove is voted by
3 the full Board and needs to receive a two-
4 thirds majority. The minority position, which
5 we've heard previously, thought that this
6 review process could be conducted by the
7 Subcommittee and reported to the full Board,
8 and remain on the Board with the consent of
9 the chair.

10 The CS proposal, based on the
11 Subcommittee's review, the Subcommittee
12 proposes removal of this substance from the
13 National List, based on OPFA criteria, 7
14 U.S.C. 6158(m)(7), which is a compatibility
15 criterion, and let's see.

16 Commenters supporting relisting of
17 APS include one company, the manufacturer.
18 Commenters opposing relisting, one
19 organization. Commenters requesting that APS
20 be returned to subcommittee, based on the
21 process failures.

22 There's a risk -- this is a

1 summary of the comments that came in. Risks
2 of exposure are negligible. APS is a non-
3 toxic chemical. Correction was suggested to
4 the TR. Silicon reduces the availability of
5 toxic elements such as magnesium, iron and
6 aluminum.

7 Foliar application is superior to
8 silica soil amendment for disease control.
9 Those opposing the relisting commented initial
10 approval was based on insufficient review,
11 specific use. The fertilized disease control
12 insecticide should be clarified. Alternatives
13 are available. Information is needed on
14 accumulation of silicon plants. International
15 standards do not allow aqueous potassium
16 silicate in crop production.

17 You know, we're seeing the
18 comments on returning to committee as you've
19 seen in the other materials, and this explains
20 the reasoning, which we've already been
21 through with the previous materials. Thank
22 you.

1 CHAIR RICHARDSON: Thank you, Jay.
2 Question. Questions on the -- discussion on
3 the motion, sorry.

4 (No response.)

5 CHAIR RICHARDSON: No discussion
6 on the motion? Are we ready for the question?
7 Yes. I believe on this one, we would start
8 with Harold.

9 MR. AUSTIN: No.

10 DR. FULWIDER: No.

11 MS. SONNABEND: No.

12 DR. WALKER: Yes.

13 MR. MARAVELL: Yes.

14 MR. BONDERA: Yes.

15 DR. TAYLOR: Yes.

16 MR. THICKE: Yes.

17 MS. BECK: No.

18 MS. FAVRE: No.

19 MR. DICKSON: No.

20 VICE CHAIR FOSTER: No.

21 MR. STONE: No ma'am.

22 MR. FELDMAN: Yes.

1 CHAIR RICHARDSON: The chair votes
2 no.

3 (Pause.)

4 MR. STONE: Six yes, nine no,
5 motion fails.

6 MS. SONNABEND: Okay. We're ready
7 to proceed to the 2016 sunset materials. The
8 first one is ferric phosphate, and Lisa will
9 describe it and then Carmela will present.

10 MS. BRINES: Thanks. The listing
11 for ferric phosphate currently appears on
12 Section 205.601 of the National List as a
13 synthetic substance under paragraph (h). The
14 listing reads as "Slug or snail bait, ferric
15 phosphate, CAS No. 10045-86-0. The substance
16 was added to the National List in 2006,
17 following a petition from 2003.

18 "There are three technical reports
19 available in support of this substance, from
20 2004, 2010 and a supplemental TR from 2012."
21 Thanks.

22 MS. BECK: So this is the first of

1 two meetings to request information to support
2 or oppose the continued allowance on the
3 National List for ferric phosphate. On
4 January 7th, 2014, the Subcommittee determined
5 that no TR was needed because there had been
6 -- there was no new information available.

7 There were 47 public comments in
8 favor of delisting. The vast majority of the
9 commenters submitted a form letter in support
10 of removal. There were five public comments
11 in favor of relisting. OMRI submitted a
12 letter, indicating that they had 17 registered
13 products with ferric phosphate.

14 The arguments in favor of
15 delisting include the following. There was
16 opposition to relisting because ferric
17 phosphate alone is not essential because it is
18 not effective, and ferric phosphate in
19 combination with EDTA poses risks to soil
20 organisms and earth worms. It uses highly
21 toxic materials in manufacture, and is not
22 compatible with organic agriculture.

1 The arguments in support of
2 relisting include the following: Ferric
3 phosphate meets the three OFPA criteria. It's
4 not harmful to human health or the
5 environment. It's consistent with organic
6 farming and it's essential for the growers.

7 Organic farmers rely on ferric
8 phosphate-based snail and slug baits as an
9 effective pest management material, and no
10 less environmentally harmful alternatives
11 exist. CCOF also made mention of having
12 completed a literature -- having reviewed the
13 literature summaries that were cited in the
14 formal recommendation from the NOSB to the NOP
15 on a petition to remove ferric phosphate on
16 10/16/2012, and found that there was no
17 compelling evidence that EDTA causes
18 significant harm to earth worms.

19 Also, the last comment was that
20 the review of inerts will be addressed by the
21 Inerts Working Group. So that concludes my
22 summary of the comments.

1 CHAIR RICHARDSON: Zea, you want
2 to take questions on this?

3 MS. SONNABEND: I thought you were
4 taking questions.

5 CHAIR RICHARDSON: Okay.
6 Discussion, input on this material? This is
7 the first time we've discussed it at the Board
8 level. Input from anyone? Jay.

9 MR. FELDMAN: I'd just like to
10 make a suggestion to the Crop Subcommittee
11 that it consider reviewing the EDTA in the
12 context of its review of this material, as a
13 way of sending a message that the Board is
14 serious about the Inerts review, and because
15 the manufacturer has indicated that they are
16 already moving to an alternative material.

17 So I think it's a confluence of
18 factors that enable the Board to both make a
19 statement, that this is an important review in
20 terms of a material review, and at the same
21 time, work with the manufacturer to verify
22 that the timing would work for them.

1 CHAIR RICHARDSON: Any other
2 discussion, comments, questions? Okay. Move
3 to the next material.

4 MS. SONNABEND: Okay, thank you.
5 Our next one is hydrogen chloride for
6 cottonseed delinting, which will be presented
7 by John, after Lisa tells us about it.

8 MS. BRINES: Thanks, Zea. The
9 current listing for hydrogen chloride appears
10 on Section 205.601 of the National List under
11 paragraph (n). It's listed as seed
12 preparations, hydrogen chloride, CAS No. 7647-
13 01-0, for delinting cottonseed for planting.

14 "This substance was added to the
15 National List in 2006, following a petition
16 from 2002. There are two technical reports
17 available, one from 2003 and a new limited
18 scope technical report that was commissioned
19 for this sunset review." Thank you.

20 VICE CHAIR FOSTER: So this is the
21 first, as with the prior material, is the
22 first meeting where this is being discussed,

1 first posting. It will be revisited at the
2 next meeting. On this posting, there were
3 roughly 60 or so comments, 50 or so from
4 public interest groups and those that they
5 inspire.

6 Of the remaining, in those there
7 were several substantive comments. Of the
8 remaining ten, a lot of somewhat more
9 technically relevant comments that was very
10 helpful from both public interest groups as
11 well as industry members, including some
12 farmers.

13 They generally all included fair
14 assessments about the viability of mechanical
15 alternatives at a commercial scale at the
16 moment, which appears to be not quite ready
17 for commercial use, but does show some genuine
18 promise.

19 All agreed on the hazards of the
20 substance, and all agreed that mechanical
21 delinting would be preferable when it does
22 reach a commercially viable scale. Comments

1 from those directly involved with cotton
2 production or processing affirm the need for
3 further research and development of mechanical
4 methods and the Subcommittee strongly urges
5 those involved with those to swiftly find a
6 viable, commercial-scale process.

7 CHAIR RICHARDSON: Questions of
8 John on this material, discussion? Anybody?
9 Any other input? Yeah, Jay.

10 MR. FELDMAN: Just one quick
11 thing. I think this is a classic example of
12 a material that needs to be subject to a very
13 rigorous sunset process, because everybody
14 agrees it's hazardous. Everyone wants to move
15 toward an alternative, but the incentives just
16 aren't quite there. A rigorous process helps
17 incentivize the alternatives.

18 CHAIR RICHARDSON: John.

19 VICE CHAIR FOSTER: So I was
20 fortunate enough, when I was doing inspections
21 years ago, to be able to a fair number of
22 cotton inspections in different parts of the

1 country, and was trained in cotton gin
2 processing and organic cotton gin processing.

3 When I was -- prior to getting
4 into the organic space, I did a lot of
5 research on, oddly enough, pesticide use, and
6 cotton is one of the big -- conventional
7 cotton is one of the big users of conventional
8 ag-chemicals.

9 I actually used some information
10 from Beyond Pesticides at that time. Thank
11 you for that, Jay and company. So when I got
12 into the organic space of organic cotton,
13 there's just -- there's not that much of it.

14 So in my mind, you know, anything
15 that can facilitate organic cotton production
16 is going to make a huge footprint on the
17 overall pesticide load in the environment,
18 certainly in North America, and I would also
19 argue in other countries.

20 China, for example, has a
21 tremendous cotton industry. So if we can get
22 these -- if we can get these other methods in

1 place, I think that would serve everyone's
2 best interests.

3 CHAIR RICHARDSON: Nick.

4 MR. MARAVELL: Just an
5 observation, Madam Chair. This to me is an
6 excellent example of why annotation at sunset
7 can sometimes be a very reasonable policy
8 route, and I think everybody agrees with what
9 John just said, and when alternatives become
10 available, this would be phased out. That
11 could be handled in an annotation, such that
12 this is permitted in the event that
13 commercially viable alternatives are not
14 available.

15 CHAIR RICHARDSON: Thank you.

16 Other comments, questions. Zea.

17 MS. SONNABEND: I think that
18 concludes the section on the Crop
19 Subcommittee. Thank you, Madam Chair.

20 CHAIR RICHARDSON: Thank you, Zea.

21 What we need to move to next will be to take
22 up the motion from yesterday on tragacanth

1 gum. So I turn this over to Harold, Chair of
2 the Handling Subcommittee. Jay is trying to
3 pass around some VerMints, so I would like
4 this to be noted.

5 Handling Subcommittee -- Tragacanth Gum

6 MR. AUSTIN: All right. At this
7 time, the Handling Subcommittee would take and
8 recall our motion that was temporarily tabled
9 yesterday, to allow the Board to have time to
10 review the additional information that we were
11 given.

12 The motion before us is a seconded
13 motion, and it is to remove tragacanth gum
14 from 205.606(x). I don't believe we need to
15 redo Lisa's part at this time, since we've
16 already covered that. So at this point, I'm
17 going to turn it over to Joe as the lead on
18 this. Joe, any further commentary from
19 yesterday?

20 MR. DICKSON: I don't have any
21 further comments beyond what I said yesterday.
22 Do you want to check in with Nick Maravell,

1 who had asked that we table the voting, so
2 that he'd have a chance to read the letter
3 from the producer of the product in question
4 that's being passed around the table.

5 CHAIR RICHARDSON: Nick.

6 MR. MARAVELL: Yes. I have no
7 objections to keeping this on the list, having
8 reviewed the letter. I just hope one day, if
9 I'm the only user of a product, that this
10 Board will show the same compassion to me.

11 CHAIR RICHARDSON: Jay.

12 MR. FELDMAN: I have a question,
13 maybe for the program, on how the untimely
14 ruling works in a case like this. Is this new
15 information that is considered untimely or
16 not? How does that work, because this is
17 obviously -- Joe, this isn't information that
18 was considered by the Subcommittee, because it
19 wasn't available at the time.

20 And I was thinking that in a
21 perfect world, the Subcommittee would take
22 this information and evaluate what VerMint is

1 saying, relative to other alternative
2 materials in that type of product. That's
3 under the essentiality clause, which you
4 haven't really done, or have you?

5 MR. DICKSON: Well to clarify, I
6 mean there are two public comments. I mean
7 one was QAI at the podium, testifying
8 directly, that one of their certified clients
9 was dependent on the substance, and that to me
10 alone is sufficient to warrant the
11 essentiality of this.

12 The letter that we have, which was
13 submitted outside of the written comment
14 period, is supplemental to that, but I don't
15 believe the whole thing rests on this letter.

16 CHAIR RICHARDSON: I would like to
17 ask Miles, however, for clarification as
18 raised by Jay, because the sunset does say,
19 has this phrase that information would be
20 considered untimely for purposes of sunset
21 review if it comes in after the public comment
22 period is finished.

1 MR. McEVOY: Well, I think that
2 refers to if the information that comes in
3 would substantially change. If you wanted to
4 do something completely different, then there
5 are mechanisms in place, where you could do
6 those completely different things by
7 petitioning for either addition or removal or
8 changes to the annotation.

9 So any new information that comes
10 in that would -- there are many mechanisms
11 that the public and the Board can utilize to
12 continue to have discussions on a particular
13 material. The sunset process has a certain
14 timeliness that needs to be maintained, in
15 order for the process to work, because of the
16 deadline of the sunset date.

17 CHAIR RICHARDSON: Zea.

18 MS. SONNABEND: I perceive the
19 untimely clause to be pretty much what Miles
20 said, information that would necessitate our
21 changing the motion or having to do a lot more
22 research on some TR question or something like

1 that.

2 But since input that is designed
3 to influence our opinion to vote yes or no is
4 not necessarily untimely, because we can still
5 make up our own minds to vote yes or no on the
6 motion on the floor.

7 CHAIR RICHARDSON: Harold.

8 MR. AUSTIN: I would just agree
9 with what Zea had just said. That was kind of
10 where I was going to go with it too. I don't
11 think it brought information that was going to
12 have to get referred back to the Subcommittee
13 to do extensive research in looking at this
14 material, based off of this one written
15 comment that was given.

16 It just, I think, substantiated
17 the comment by QAI. So it gave us better
18 clarification and a little more definition was
19 primarily all of that. But I would use it as
20 an example, as we look ahead to the spring and
21 the fall meetings next year, that the need for
22 all of the stakeholders to take and be

1 diligent in paying attention to the materials
2 that are up for sunset review, and getting
3 their commentary, both written and public oral
4 comment, get that in and get signed up for the
5 oral testimony.

6 But be diligent on what's on the
7 agenda and what's looming on the horizon,
8 because in the future, we probably won't have
9 time to take something up like this. This we
10 did. We had the time. But if we were to get
11 35 of these, I would probably say that we
12 probably wouldn't look at them.

13 CHAIR RICHARDSON: Nick.

14 MR. MARAVELL: Yeah. I'd just
15 like to emphasize Harold's comment, because
16 the impression that I got from talking with
17 Joe was that, you know, this was something
18 that was looked at in the Subcommittee, but
19 there was a limit to how deeply it was looked
20 at, because there seemed to be no apparent
21 interest in continuing it.

22 So we need to hear from the

1 industry, so that you know, we can do our job.

2 CHAIR RICHARDSON: Ready for the
3 question? I think we are. The first person
4 to start this is Wendy.

5 DR. FULWIDER: No.

6 MS. SONNABEND: No.

7 DR. WALKER: No.

8 MR. MARAVELL: No.

9 MR. BONDERA: Yes.

10 DR. TAYLOR: Yes.

11 MR. THICKE: No.

12 MS. BECK: No.

13 MS. FAVRE: No.

14 MR. DICKSON: No.

15 VICE CHAIR FOSTER: No.

16 MR. STONE: No ma'am.

17 MR. FELDMAN: I like VerMints.

18 Yes.

19 MR. AUSTIN: No.

20 CHAIR RICHARDSON: The chair votes
21 no.

22 (Pause.)

1 MR. STONE: Three yes, 12 no,
2 motion fails.

3 CHAIR RICHARDSON: It is 11:30 and
4 I think that brings us to the end of the
5 Handling Subcommittee report, all of our final
6 votes, and so the afternoon, we will have NOSB
7 officer elections and the work plans will be
8 being discussed, etcetera.

9 So we will reconvene back here at
10 one o'clock, at one o'clock. It says 1:15 on
11 the agenda, but I suggest we could do it one
12 o'clock. Okay. You can go eat now.

13 (Whereupon, the above-entitled
14 matter went off the record at 11:30 a.m.)

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A F T E R N O O N S E S S I O N

1:09 p.m.

Election of Officers

CHAIR RICHARDSON: Ladies and gentlemen, the first item on the agenda is the election of officers. We will entertain a motion for Chair.

MR. MARAVELL: I nominate Jean. Well, let me see if I can read that. Jean Richardson.

CHAIR RICHARDSON: Is there a second for the nomination of me?

MR. AUSTIN: I second it.

CHAIR RICHARDSON: Seconded by Harold and Jay. Are there any other nominations to be put up for the office of Chair? Are there any other nominations for the office of Chair?

(No response.)

CHAIR RICHARDSON: Mr. Secretary.

MR. STONE: I would suggest while I'm enjoying some dark chocolate that we --

1 Jean be named as a Chair by acclamation.

2 DR. WALKER: Second.

3 CHAIR RICHARDSON: There being no
4 objection to me continuing on to serve as
5 Chair for a year, it's recorded and thank you
6 very much. I really appreciate your support,
7 and I hope to do a good job and I will try to
8 work with everyone as a team on an equal basis
9 and I appreciate your input any time, with any
10 kind of complaints or of course praises, any
11 time you feel like doing so.

12 (Applause.)

13 CHAIR RICHARDSON: The next
14 officer is the office of Vice Chair. Are
15 there any nominations? Harold.

16 MR. AUSTIN: I nominate Tracy.

17 CHAIR RICHARDSON: Is there a
18 second?

19 DR. WALKER: Second.

20 MR. MARAVELL: I second.

21 CHAIR RICHARDSON: Nominated by
22 Harold, seconded by both Calvin and Nick. Are

1 there any other nominations for Vice Chair?
2
3 Are there any other nominations for Vice
4 Chair?

4 (No response.)

5 CHAIR RICHARDSON: Hearing none,
6 Mr. Secretary?

7 MR. STONE: Madam Chair, with one
8 nomination Ms. Favre nominated as Vice Chair,
9 I declare she be appointed by acclamation.

10 CHAIR RICHARDSON: Good luck,
11 Tracy. You have to follow John.

12 (Applause.)

13 MS. FAVRE: I appreciate that vote
14 of confidence. Thank you.

15 CHAIR RICHARDSON: The third
16 office that we have to have a nomination for
17 is that of Secretary. Are there any
18 nominations for Secretary? Nick.

19 MR. MARAVELL: I nominate Harold.

20 CHAIR RICHARDSON: Harold has been
21 nominated. Second?

22 MS. SONNABEND: Second.

1 CHAIR RICHARDSON: Seconded by
2 Zea. Are there any other nominations for
3 Secretary? Jennifer.

4 DR. TAYLOR: I nominate Colehour.

5 CHAIR RICHARDSON: Colehour. Is
6 there a second for nominating Colehour for the
7 office of Secretary?

8 MS. FAVRE: I second the
9 nomination.

10 CHAIR RICHARDSON: Been nominated
11 and seconded by Tracy. Are there any other
12 nominations for Secretary? Are there any
13 other nominations for Secretary? I would ask
14 -- Calvin, sorry.

15 DR. WALKER: Is this for the
16 Secretary of Agriculture?

17 CHAIR RICHARDSON: Secretary of
18 the NOSB. This should be done by secret
19 ballot. The Secretary is distributing a green
20 card.

21 Please write the name of the
22 person that you would like for Secretary on

1 that card. Those cards should then be
2 returned to the Secretary. The Secretary and
3 Chair will tally them and announce the votes.

4 The actual total number is not
5 announced, but simply who is the winner of
6 that illustrious position.

7 (Pause.)

8 MR. STONE: Harold will be the
9 next Secretary of the NOSB for the next term,
10 two terms. Thank you.

11 (Applause.)

12 Subcommittee Work Plans

13 CHAIR RICHARDSON: The next item
14 on -- congratulations, Harold. The next item
15 on the agenda is the Work Plans of the
16 Subcommittees. Shall I put those up? Well,
17 it still says "work plans" on this agenda. Do
18 you want to talk about the change of
19 terminology?

20 MR. McEVOY: Yeah. The NOSB has
21 had the term work plans that have been used
22 for a long period of time, in terms of what

1 the topics are that they're working on for the
2 upcoming year or the upcoming semester.

3 The term "work plan" within the
4 Department of Agriculture is used for moving
5 rulemaking and guidance documents through
6 clearance. So we are suggesting that in order
7 to not get people all excited within the
8 Department of Agriculture, that we have the
9 NOSB work be considered not a work plan but
10 some other word that expresses the topics that
11 they're going to be working on in the upcoming
12 semester.

13 So we've thrown out a few
14 different terms. We thought agenda items.
15 I've heard syllabus, topics. Work plan item,
16 yeah.

17 CHAIR RICHARDSON: We could have a
18 competition.

19 MR. McEVOY: So that -- we're just
20 suggesting a different name, so that we can
21 keep the work of the NOSB and the agenda items
22 that the NOSB's working on separate from any

1 departmental action.

2 MS. ARSENAULT: Miles, may I add
3 that we plan on posting these on the website?

4 CHAIR RICHARDSON: Okay. So first
5 is Carmela. You want to report on your
6 Committee's work plan?

7 MS. BECK: So our work plan is to
8 bring forth the discussion document and turn
9 it into a proposal for spring 2015. Okay.
10 That's all we have at this point.

11 CHAIR RICHARDSON: Oh. Anything
12 else you want to say?

13 (Off mic comments.)

14 CHAIR RICHARDSON: Are there any
15 other topics that other members of the Board
16 would like to think of being added to the
17 CACS, whatever it's called, work plan agenda
18 I'll use, or work agenda I'll use? Are there
19 anything else, a syllabus? Yeah, Mac.

20 MR. STONE: I can't remember what
21 it is, but there was one, I think it was in
22 Betsy's presentation, maybe Miles, something

1 during the USDA that came up. They thought it
2 was something that CACS could work on. But at
3 this moment, it plumb evades me.

4 MR. McEVOY: Yeah. We have
5 another item that we'd like the CACS to work
6 on, in terms of peer review, the National
7 Organic Program accreditation. This is a
8 requirement under the Organic Foods Production
9 Act, and also within the USDA organic
10 regulations.

11 So we have to -- we have a draft
12 process that we've developed, in terms of how
13 we would implement this. Our plan would be to
14 send the draft process to the National Organic
15 Standards Board. Certification and
16 Accreditation Subcommittee is the appropriate
17 subcommittee that should take a look at this,
18 and get their input for discussion on the
19 public agenda for spring 2015.

20 CHAIR RICHARDSON: Are there any
21 other additions or comments you have for
22 Carmela?

1 (No response.)

2 CHAIR RICHARDSON: Okay. The next
3 syllabus item is from the Crops Subcommittee.
4 Zea.

5 MS. SONNABEND: Thank you. We
6 have quite a full list coming up here, as 2017
7 sunsets will start to be presented. But first
8 we have several new petitions, some of which
9 have -- are not that new, but are still
10 wending their way through the process.

11 There are four we expect to have
12 on our spring agenda. Laminarin, which you
13 recall was discussed last time, and it was
14 decided to send it for a TR. Exhaust gas.
15 Allyl isothiocyanate and calcium sulfate,
16 which as you might know is the same as gypsum,
17 but it's being petitioned for a new -- from a
18 new source.

19 And then we have one new petition,
20 3-decene-2-1, which probably won't be ready in
21 time for our next agenda, but we will start
22 the process of discussing it and requesting a

1 TR in the next semester. Undoubtedly, we'll
2 have another inerts update.

3 We probably will have one at every
4 meeting where we see where we have gone
5 between now and then in the inerts review
6 process, and there will be a further
7 discussion document on the contamination
8 issues, as we move those issues along.

9 I'm not going to read all the 2017
10 sunsets, but we have, I don't know, 58, a
11 certain number in that ball park that will be
12 coming about maybe 10 or 12 of them are having
13 TRs done. So if the TRs aren't done in time,
14 they may not make it for summary to the next
15 agenda.

16 But I suspect the bulk of them
17 will, and the ones we didn't get TRs on will
18 also be summarized at the next meeting. And
19 that is our agenda, syllabus, whatever.

20 (Off mic comments.)

21 MS. SONNABEND: Oh, I would like
22 to mention one other brief thing. Miles and

1 I had a discussion about -- I didn't go into
2 this right at this meeting, but the sodium
3 carbonate peroxy-hydrate, which just got
4 renewed. It has an annotation on it that's
5 pointless. It has no information and there's
6 no incentive for anyone to petition to remove
7 it.

8 So we would be eagerly awaiting
9 any new policy on how to change an annotation
10 without a petition, and that is a strong
11 candidate to be changed early. So I don't
12 know if that falls back to the Crops
13 Subcommittee after the whatever other
14 committee's dealing with it, but I would like
15 us to take that up.

16 MR. McEVOY: Yeah. I think that
17 the concept of changing annotations during
18 sunset, that that should be taken up by the
19 policy development subcommittee, in terms of
20 the process of how that could occur.

21 MS. SONNABEND: But possibly once
22 the process is in place, it will be something

1 that Crops would then take up, right?

2 MR. McEVOY: Sure.

3 MS. SONNABEND: For that specific
4 one.

5 MR. McEVOY: Okay.

6 CHAIR RICHARDSON: Zea, I have to
7 tell you that for the record, you have to read
8 them all. You have to read all your
9 substances, because Miles said so.

10 (Off mic comments.)

11 CHAIR RICHARDSON: This way, it
12 will be in the written record.

13 MS. SONNABEND: They're in
14 writing, though. The written record can't be
15 handed to the other written record, and
16 Harold's going to have to read all his too?

17 MR. McEVOY: We could have Lisa
18 Brines read them into the record if you'd
19 prefer.

20 MR. MARAVELL: You know in
21 Congress, you know, they give unanimous
22 consent to read documents into the record. I

1 mean could we do that?

2 MR. McEVOY: Okay. We'll have it
3 -- somehow, there will be a record that these
4 are the substances that are up for sunset
5 review starting in the spring of 2017, 2015.

6 MS. SONNABEND: I think it's
7 already been posted in your sunset time line,
8 where you did have lists.

9 CHAIR RICHARDSON: It is out
10 there. All right. Any discussion of the
11 syllabus for the Crops Subcommittee that's
12 been presented? Any questions of Zea? Any
13 other items that you want to add to her
14 agenda?

15 MR. McEVOY: At your own risk.

16 CHAIR RICHARDSON: At your own
17 risk, right. Okay. So then we turn to the
18 syllabus for the Handling Subcommittee,
19 Harold.

20 MR. AUSTIN: Okay. For the spring
21 semester agenda items for the Handling
22 Subcommittee, the substances that we will be

1 working on as far as proposals, whole algal
2 flour, ammonium hydroxide, and I would like to
3 just clarify. Whole algal flour has been
4 referred back to the Subcommittee to continue
5 to work on, along with glycerine.

6 So those two have been referred
7 back, and we will continue to work on those
8 and hopefully come out in the spring. Along
9 with those, we will have ammonium hydroxide,
10 which is a boiler water additive. We will
11 have polyalkaline glycol monobutyl ether, from
12 now on hence known as PGME.

13 Triethyl citrate, sodium lactate
14 and potassium lactate. We will also have the
15 ten 2016 sunset materials, which were
16 previously discussed during yesterday's
17 presentation. So those are all listed for the
18 record there, as well as 104 2017 sunset
19 materials, which have also been previously
20 listed in the record, so that there is a
21 reference point if anybody wants to look at
22 exactly what those are.

1 It's just a minor workload that
2 we've got in front of us. Along with all of
3 that, we will continue to work in the
4 ancillary substances, and back in the Handling
5 Subcommittee we will then begin to work on a
6 discussion document for BPA. That's it, short
7 and sweet. Not much going on this next year.

8 CHAIR RICHARDSON: So are there
9 any other things people would like to suggest
10 get added to the Handling Subcommittee
11 syllabus, or any questions of Harold with
12 regard to syllabus? Zea.

13 MS. SONNABEND: Well, I'm very
14 much hoping that we will get the opportunity
15 to evaluate BPA and packaging, as Miles has
16 told us. A memo should be forthcoming.

17 MR. McEVOY: Yes. We support it
18 being on the agenda for the next semester. We
19 do have a memo that you should be receiving
20 very shortly, to provide some parameters for
21 that work.

22 CHAIR RICHARDSON: Anything else

1 for this subcommittee? Okay. So thank you,
2 Harold, for the presentation. The next one,
3 Livestock Subcommittee, Tracy.

4 MS. FAVRE: Thank you, Madam. We
5 have the ever-present, ever-painful subject of
6 methionine on our spring work plan, syllabus,
7 whatever. Acidified sodium chloride, excuse
8 me, aluminum sulfate, sodium bisulfate, zinc
9 sulfate, all as petitioned materials.

10 We have, I believe it's 42 or 43
11 2017 sunset materials, and that's all that we
12 currently have on our work schedule, with the
13 possibility that should the aquaculture draft
14 standards come out, those might be reactivated
15 within our Subcommittee. Thank you.

16 CHAIR RICHARDSON: Any questions
17 of Tracy or any additions you might suggest
18 for her working agenda? Discussion. Mac.

19 MR. STONE: So is aquaculture on
20 there, so that if we wrap up your bread crumb
21 trail document and have it in there, so if the
22 rules are out let's kind of officially have it

1 on there?

2 MS. FAVRE: Yes, thank you.

3 That's an oversight on my part. I should have
4 mentioned that. We will actually have that
5 finalized for the spring meeting.

6 CHAIR RICHARDSON: So we should
7 add -- to that agenda, we should add the
8 aquaculture discussion document to the spring
9 agenda? Yeah Francis.

10 MR. THICKE: Since the animal
11 welfare standards are going to be coming on
12 real soon, maybe we need to be thinking that
13 needs to be on at some point.

14 CHAIR RICHARDSON: I think you're
15 joking, right? I hope he's joking. Harold,
16 you look like you have something to say?

17 MR. AUSTIN: A general statement
18 Tracy, not as specifically for Livestock. But
19 I wanted to clarify back for our Handling, and
20 then I'll do it now for here, is that the 2016
21 sunset materials, this will be their second
22 and final listing, and the 2017, this will be

1 their first listing for public commentary when
2 they come out in the spring. Just for
3 clarification onto the record.

4 CHAIR RICHARDSON: Thank you.
5 Anything else for Livestock? Okay. The next
6 subcommittee is Materials GMO Ad Hoc. Zea?

7 DR. WALKER: Thank you. Thank you
8 Madam Chair.

9 CHAIR RICHARDSON: I'm sorry,
10 Calvin. My apologies.

11 DR. WALKER: No problem. We have
12 three items. One will be seed purity from
13 GMO. We are looking at bringing a report back
14 to this august body at our next biannual
15 meeting. The second topic will deal with
16 excluded method terminology.

17 We were looking at a discussion
18 document. However, we got word yesterday that
19 that may not be the best way, that we may have
20 look at something in terms of a policy memo or
21 instruction to certifiers, and we'll be
22 getting with the program to see what the best

1 method to bring the document forward to the
2 public.

3 Third item deals with prevention
4 strategies, guidance for excluded methods in
5 crops and animals, and that Francis Thicke and
6 I will be working on that particular document.
7 We apologize for not getting it out for this
8 particular round, but we hope to have it for
9 the spring. That concludes the three that we
10 have.

11 CHAIR RICHARDSON: Thank you,
12 Calvin. Are there any other suggestions for
13 additions or comments, discussion on the items
14 that you see on his agenda? Yes, Nick.

15 MR. MARAVELL: Calvin, we're
16 combining -- okay, exclusion methods in Crops
17 and Handling all at once, right, in the same,
18 and there are no topics for Livestock; is that
19 correct, under that?

20 DR. WALKER: That's correct.

21 CHAIR RICHARDSON: Okay. The next
22 subcommittee is here back again. You should

1 all be pleased to see, we have back the Policy
2 Development Subcommittee, and we have two
3 items that are approved to be on our agendas
4 for the spring semester.

5 We have -- we'll be getting back
6 the policy and procedure manuals, which would
7 be updated and reorganized, and the NOP and
8 the NOSB will collaborate on this document.
9 It will go out for public comment as before,
10 and we will work on that really hard this
11 spring semester.

12 The other item, which we have all
13 recognize we need to reconsider is a work
14 agenda item, which will deal with annotations.
15 That too will be on our agenda to be worked on
16 fast as we can do, since we can see that it's
17 something that's really needed.

18 I am obviously stepping down as
19 the chair of the PDS, since I'm Chair of the
20 NOSB. So a new chair will be designated
21 within the next couple of weeks. So that
22 committee will be able to officially meet to

1 take up its work very soon. Questions? Mac.

2 MR. STONE: So just in that little
3 chart here, it says "Best Practices and Use of
4 Annotations in Proposals," and but that's also
5 sunset? Is that two separate items sort of?

6 CHAIR RICHARDSON: Well, let me
7 explain this one. Several months ago, when
8 there was no PDS subcommittee, Harold and one
9 of his other -- NCS. He's on the CACS
10 Committee, he was concerned that there was a
11 lack of annotations and that they were
12 necessary.

13 Therefore, he began to propose an
14 annotation working agenda item in CACS, that
15 as soon as we were able to have the Policy
16 Subcommittee back again. Therefore, we've
17 moved some of the proposed -- the proposed
18 document that Harold had begun developing over
19 to the subcommittee, the Policy Subcommittee.

20 So all aspects of annotations will
21 be being looked at at the same time, and it's
22 what will be taking place. Thank you. Any

1 other questions? Yes, Jennifer.

2 DR. TAYLOR: Would we want to
3 address here something about how to focus on
4 or address the comments such as the Vitamint
5 comment that was provided to us today on the
6 floor? How to address this during the
7 meeting? Wasn't that a topic that we said
8 that we would have through the Policy
9 Development Subcommittee, how to address the
10 new information that comes in from the floor?

11 MR. MARAVELL: Timeliness of
12 information, as in the VerMints.

13 CHAIR RICHARDSON: Oh, timeliness
14 of information.

15 DR. TAYLOR: Timeliness. Is that
16 a topic that needs to be listed as a --

17 CHAIR RICHARDSON: How do people
18 feel about a timeliness? You mean timeliness
19 of information coming in as part of the sunset
20 process?

21 DR. TAYLOR: Yeah.

22 CHAIR RICHARDSON: Yeah. Is that

1 -- that's what the intent is of your
2 suggestion? Would that be something that we
3 would be working on, PDS folks, as part of our
4 general revisions of the PBM? Mac, what do
5 you think?

6 MR. STONE: I think that's the
7 logical place to do that. We obviously it's
8 happening at the same time that we're trying
9 to discuss it. So I'll use that as the
10 launching pad to I think all of us in
11 committee work and the audience, to help us to
12 get the word out on these sunset materials,
13 Harold, to be sure that especially this long
14 list and this first reading.

15 We heard from certifiers that, you
16 know, their clients don't necessarily
17 recognize the names that we're using. So
18 maybe in some of our proposals that go out in,
19 it's probably February, Michelle, whenever
20 those go out, that we use common names and do
21 all we can to get the word out and urge the
22 audience, the groups in the audience, to help

1 us get that word out. It should. I think
2 that should be part of that Policy Committee.

3 CHAIR RICHARDSON: Any other
4 questions, comments on Policy Subcommittee?

5 (No response.)

6 CHAIR RICHARDSON: Okay. So that
7 concludes that section of our agenda items.
8 That's what we're calling it, yes. Got
9 something you want to say?

10 Subcommittee Assignments

11 MR. McEVOY: So the other thing
12 that happens after the fall meeting is with
13 the new members coming on and members leaving
14 is the subcommittee assignments change, and
15 new people get assigned to subcommittees. So
16 I would ask the Chair to maybe discuss how
17 that process is going to work from -- during
18 this transition time?

19 CHAIR RICHARDSON: Yes. During
20 the transition time, what happens is that the
21 positions, the officer positions take place
22 immediately, and the past chairs, etcetera,

1 become known as acting. So we now have an
2 acting secretary and a real secretary, as the
3 way the PPM is written, for example, and an
4 acting chair and real -- a vice chair and a
5 real one over there.

6 So it's a little bit cumbersome.
7 Actually, it's some of the sorts of things I
8 might change when we're working on this PPM.
9 So they -- so they will -- so both vice chairs
10 and secretaries will be functioning as though
11 -- on all the subcommittees, on all the usual
12 committee work that they do right away.

13 Then within 30 days, the
14 subcommittees themselves will be restructured,
15 based on discussion amongst the officers and
16 amongst the present chairs. During that same
17 period of time, we will be determining, based
18 on the qualifications of the incoming four
19 members, which subcommittees they should be
20 asked to serve on, and that's normally done at
21 the Chair's discretion, so to speak.

22 But certainly I would be doing it

1 in consultation with everybody, to be sure we
2 get them put in the right place, to be sure
3 they get all that work, for example, in the
4 Handling Subcommittee where we need people.

5 That will all take place within 30
6 days, so that by the time we get to the time,
7 the period when the new Board members take up
8 their position formally on the Board, that's
9 what, January the 24th I believe it is, 24th.

10 By that time, they'll know which
11 subcommittees they're on. They'll have done
12 their homework and be ready to go on our
13 conference calls. So that's what we will be
14 doing during this transition time. Is there
15 anything else you wanted me to comment on
16 that? We will be specifically following the
17 PPM procedures on all this.

18 MR. McEVOY: Yeah. Just to add a
19 little bit to that. As soon as there's
20 determinations made on the subcommittee
21 assignments, then we will be able to provide
22 that information through an NOSB or a USDA

1 Organic Insider, so that the public will know
2 about these new subcommittee members.

3 The other thing that we plan to
4 do, as Michelle mentioned, is to post the
5 agenda items or action plan for the spring, so
6 that the public also sees that list of topics
7 that the Board will be working on and getting
8 ready for.

9 The other thing to keep in mind,
10 the Board has obviously a lot of work to do
11 between now and the next meeting. But all of
12 their proposals for the spring meeting, which
13 is in La Jolla or San Diego the last week of
14 April, that seems a long way away.

15 But they'll have to have their
16 proposals completed by the end of February,
17 because the proposals have to be completed,
18 and then they have to be posted and available
19 for public review and comment. So it's a lot
20 of work for them to do with the holidays and
21 the transition, between now and the end of
22 February.

1 CHAIR RICHARDSON: Right.
2 Anything else on the changing committee
3 structure? So Jennifer.

4 DR. TAYLOR: I would like to
5 suggest that I know in the PPM we had
6 something written about providing mentors, and
7 that would be mentors to the new committee
8 members and of course subcommittee members, as
9 well as maybe mentors to those as you change
10 committees.

11 If you have committee
12 reassignments, it might be appropriate as well
13 to bring everybody up to speed.

14 CHAIR RICHARDSON: Yes. In terms
15 of the mentors for the new full Board members,
16 as required by our PPM, I have already worked
17 with them and with mentees on the Board. So
18 mentees and mentors to match them together, in
19 a manner that seems appropriate, and they've
20 all agreed. So all that is set up.

21 DR. TAYLOR: Great.

22 CHAIR RICHARDSON: For the mentors

1 for the incoming Board members. Your
2 suggestion that there be mentors for those
3 people sort of switching committees is what
4 you're thinking?

5 DR. TAYLOR: Also, I just think
6 that that would make the flow and the rate of
7 knowledge exchange to be better.

8 CHAIR RICHARDSON: Good
9 suggestion.

10 DR. TAYLOR: Uh-huh, instead of
11 just jumping into the meeting, to have some
12 kind of information about what takes place in
13 that particular subcommittee.

14 CHAIR RICHARDSON: What takes
15 place, you mean for the incoming Board
16 members?

17 DR. TAYLOR: Yes.

18 CHAIR RICHARDSON: Yes.
19 Absolutely, yes. They'll get more information
20 probably than they really want, and they
21 already are. I mean they're all four of them
22 are very active in trying to accumulate as

1 much knowledge as they can do before they jump
2 in.

3 Because as we all recall, it is a
4 very big amount of material thrown at you as
5 you come onto the Board. Thanks, Jennifer.
6 Any other comments on the changed committee
7 structure or other matters similar to that?

8 (No response.)

9 CHAIR RICHARDSON: Okay. So the
10 next item on the agenda is really a rather
11 wonderful thing. Well, wonderful in some
12 ways, sad in others. We're going to be making
13 presentations to the outgoing members, which
14 Miles, you'll be doing that, and then we have
15 some special things from the NOSB for these
16 members as well, and each member will be
17 making some closing comments.

18 Tribute to Outgoing Board Members

19 MR. McEVOY: Okay. So these Board
20 members have been on the National Organics
21 Standards Board for five years, nine meetings.
22 I missed one unfortunately last year. Wow.

1 It's just amazing that so much time has gone
2 by and we've had so many fun conversations
3 about corn-steeped liquor, carrageenan, inerts
4 and sunset.

5 So been a lot of fun, a lot of
6 good times, been a lot of good places and a
7 lot of good conversation, some very deep
8 discussions and debates. But it's all been
9 good. These are really, really wonderful
10 people. They've really contributed to the
11 forward movement of the organic sector, the
12 organic community. They all deserve an
13 immense amount of respect and support and
14 gratitude for the public service that they've
15 provided.

16 One does -- I'll start with Wendy
17 Fulwider. Wendy is one of the more quiet
18 members of the Board. But if it wasn't for
19 her, we wouldn't have the animal welfare
20 recommendations that were passed in 2011, a
21 couple of years ago now, and without those
22 recommendations, the USDA would not be able to

1 move forward with implementing those
2 recommendations on furthering animal welfare
3 requirements under the USDA organic
4 regulations.

5 So Wendy Fulwider, for your
6 efforts on animal welfare, been an immense
7 contribution to the organic community, and
8 thank you so much for your service.

9 (Applause.)

10 (Off mic comments.)

11 DR. FULWIDER: Okay. How time
12 flies. I can't believe five years have gone
13 by. It doesn't feel that way. It's been
14 really wonderful and a privilege, you know, to
15 serve on the Board with all the different
16 folks that have been here over the years.

17 During my time as Livestock chair,
18 we unanimously passed the two recommendations,
19 the animal welfare and stocking rates, and
20 animal handling and transport to slaughter.
21 I really enjoyed working on those. So I hope
22 that, you know, they do move forward, and if

1 you need any advice, give me a call because
2 I'd be happy to answer questions. I like
3 that.

4 So I think this shows, you know,
5 that we passed these two recommendations, that
6 we can work together and we did a really great
7 job doing that. We passed those
8 recommendations unanimously, so that was
9 really cool. While the animal welfare piece
10 has been criticized a few times for now going
11 far enough, I do believe it's a really great
12 start, and I believe that future boards will
13 be able to build on this.

14 I hope that the Livestock
15 Committee will put the well being and the
16 needs of the animals first as they move
17 forward, and this isn't always easy. As
18 anyone who has followed the methionine
19 recommendations and story knows.

20 While I've been on this Board, my
21 son Cody has been home growing the farm and
22 the number of animals on the farm and the

1 number of acres that we're working, and he's
2 been sending me pictures every day of new
3 calves as his dairy cattle are starting their
4 calving season.

5 So I believe he is anxious for me
6 to get back home and take care of some of
7 those calves for him. So thank you.

8 (Applause.)

9 MR. McEVOY: Next, I'd like to
10 recognize Jay Feldman for his contributions.
11 Jay is not one of the quieter members of the
12 Board, has contributed an immense amount of
13 public discussion, and we've had -- you know,
14 it might appear to you all from the audience
15 that Jay and I maybe are not agreeing on a lot
16 of things at times.

17 But I have immense respect for
18 Jay, for all of the knowledge. You bring that
19 passion and just the technical knowledge that
20 you bring to the Board and share with anybody
21 in the community really, really moves
22 everything forward. So thank you so much for

1 your service and everything you've done for
2 organics.

3 (Applause.)

4 (Off mic comments.)

5 MR. FELDMAN: Thank you. Well
6 thank you for those kinds words, Miles. I
7 concur. I agree with you. You know, this is
8 part of a process, and the process is
9 important to moving organic forward.

10 I want to share with you folks
11 what I've learned. The record's clear on what
12 we've accomplished. I feel proud to have been
13 a part of a lot of positive growth forward.
14 What have I learned as an NOSB member in the
15 environmental position?

16 On the public, I've learned to
17 trust the public, ensure that the public
18 trusts you. Assume that we are all here to
19 grow organic, but that we may see organic
20 growth in different ways with different
21 prerequisites for growth.

22 I'm working with others.

1 Inclusion always works better than exclusion.
2 Disagreement does not equal disrespect.
3 Listen carefully to those you disagree with.
4 Accept different personalities, even when you
5 may not like them. We do not like everybody
6 in our families, but we are part of an organic
7 family.

8 How we get there is important as
9 getting there. On process, full participation
10 in decision-making builds trust in the
11 decisions. Allow people to make mistakes and
12 know that all mistakes are not a conspiracy or
13 part of a conspiracy.

14 On collaboration, collaboration is
15 challenging sometimes, but it's fun. On
16 facts, facts matter. Don't be afraid of
17 facts, even if you think it will make you or
18 your cause look bad. The law matters. On
19 mistakes, mistakes happen along the way. I've
20 already said that.

21 Resources. Resources funding is
22 incredibly important. Technical reviews are

1 critical to the deliberations of this Board.
2 On defining organic, organic is a lifestyle
3 cultural choice that is now pervasive in
4 society. Society really does look to this
5 NOSB to create a gold standard for defining
6 organic.

7 So what goes on here has effect
8 throughout society, in terms of managing
9 practices in our homes, institutions, in our
10 communities, our parks, our schools, our home
11 gardens in addition to the marketplace of
12 food. Organic is part of the systemic changes
13 that must take place, as we chart a
14 sustainable path forward.

15 On environmentalists, listen to
16 the environmental voice in the deliberations.
17 The law was created because it was understood
18 by those who participated in writing the law,
19 that conventional practices were not or are
20 not sustainable. So seek out the science and
21 perspectives of environmentalists.

22 They're 20 percent of the Board

1 and intended by Congress to have a significant
2 impact on the Board decisions, especially when
3 combined with consumers, another 20 percent.
4 Environmentalists want to work with farmers,
5 another 20 percent.

6 On government involvement,
7 government has had an incredibly important
8 role in this process. However, the NOSB is
9 here to be an independent voice. Corporate
10 influence. Even though corporations are
11 people under some definitions, corporate
12 interests do not always align with organic
13 interests, and companies' fiduciary
14 responsibility to their owners or shareholders
15 to raise revenue.

16 However, our job is to try to
17 align those corporate interests with the core
18 values and principles of organic. When the
19 OMB, Office of Management and Budget, while
20 they may represent business interests and
21 protect against uncertainty in the
22 marketplace, remember our striving for

1 continuous improvements creates an ongoing
2 climate of uncertainty, in which organic
3 flourishes. We have a history of that.

4 So on a personal note, I'm almost
5 done Jean -- on a personal note, I need to
6 thank Terry. As hopefully you all know, Terry
7 is a cherished colleague of mine who has
8 contributed so much to my ability to dive deep
9 into the work of this Board.

10 I hope you all can find someone
11 like Terry, preferably someone available 24-7,
12 who can help you sort through these difficult
13 issues. I'd like to thank Michelle and the
14 staff of the NOSB, all hard-working people
15 that want to facilitate the work of this
16 Board.

17 Use them, cherish them as kind and
18 considerate individuals that want this Board
19 to work. But Michelle, Michelle, you are
20 special. You redefine the definition of
21 government worker, and we need a new
22 definition for government worker, because all

1 -- you'll find as Board members and those on
2 the Board know, she is available to you almost
3 24-7.

4 I need to thank my family, because
5 as you all know as Board members, this does
6 take a toll on family. I'm envisioning myself
7 standing on the Schoodic Peninsula in Maine
8 this summer where, you know, trying to find
9 time to find not only a cell connection, but
10 a time to get on an NOSB call.

11 So with the commitment that we all
12 make to this Board, it does take a toll on
13 family time. I must thank my wife Josie, who
14 many of you have met, and my children as well,
15 Gabriel and Kira, for all those vacations
16 where I had to step aside at times.

17 But at the end of the day, I need
18 to thank all of you in the audience and all of
19 you on the Board. I mean you all put in an
20 incredible amount of time and resources, and
21 believe in this process and want this process
22 to work. I will continue to support you in

1 any role that I have going forward.

2 So thank you all for everything
3 you've done and continue to do to make organic
4 grow and make organic strong, and ensure that
5 the public trusts the integrity of the process
6 going forward. Good luck to everybody. Thank
7 you for welcoming me. Thank you for your
8 patience with me. Thank you for listening to
9 me and I look forward to working with you from
10 the other side of the table. Take care.

11 (Applause.)

12 MR. McEVOY: Okay. Joe is next.
13 Joe Dickson, five years. Lots of meetings,
14 lots of discussions on a whole bunch of
15 different things. Your insight into the
16 various parts of the handling and distribution
17 network has been very valuable to all the
18 Board and to the program as well.

19 Your -- he does a lot of
20 interesting things. You should talk to him
21 about his farm and his animals, because I
22 think that also brings your roots in the soil

1 and in the farming community, and that's a
2 part of Joe that maybe not a lot of people
3 know.

4 But it's been a pleasure to know
5 you, and I hope we can continue to work
6 together as you go on to other pastures.

7 (Applause.)

8 (Off mic comments.)

9 MR. DICKSON: Thank you, Miles.
10 Thank you for making me come right after Jay.
11 My comments are not going to be anywhere as
12 extensive, but they will be just as heartfelt.
13 So you know, all the hallways conversations
14 the last couple of days have been like "So,
15 you're excited to be done?"

16 I'm like yeah, I'm so excited for
17 all the time I'm going to get back, how fun
18 it's going to be to sit back there and get up
19 and go walk around and go to Starbucks and get
20 my own coffee and all that stuff.

21 We were having all these
22 conversations, and then as last night rolled

1 around, I think, you know, we had a Board
2 dinner last night that had some very heartfelt
3 conversations and toasts and, you know, real
4 expression of sentiments to the outgoing and
5 incoming and current Board members.

6 I started to feel this really
7 incredible sadness, that this was all coming
8 to an end. This is an unseemly brilliant,
9 interested, committed group of people, like so
10 opinionated and so expressive, and I have
11 learned more sitting at this table for the
12 last five years than most, you know, Master's
13 degree programs would impart, you know.

14 I mean it is just -- each and
15 every person at this table is just a genius,
16 and brings so much to this process. I'm very
17 lucky to work for a company and for a boss
18 that understands the value of the time I spend
19 at this table.

20 I'm very fortunate and, you know,
21 the work here at the end of the day basically
22 considered part of my job. However, Francis'

1 cows, Mac's turkeys, Wendy's growing herd of
2 all kinds of things, which is really exciting,
3 Nick's vegetables and animals and all that, I
4 don't think they're as forgiving as my boss
5 is.

6 I really want to acknowledge the
7 amount of time it takes to sit here at this
8 table, and especially the impact that has on
9 people who are running very small, very hard
10 to manage agricultural operations, and to fly
11 off to Louisville for five days and just sit
12 at a table and talk is really powerful and
13 really important, but it must be a huge
14 struggle. So I really want to acknowledge the
15 people on the Board who don't work at a desk
16 all day.

17 About what we're doing here, I
18 mean I started working in organic food because
19 I believe that what was happening on organic
20 farms, and as I came to learn in this room, is
21 part of our work to -- and part of the power
22 of organic agriculture to heal the earth, to

1 undo the damage of industrial agriculture, to
2 look powerfully at the way we treat animals
3 and each other and plants.

4 The questions on that syllabus for
5 the fall, a lot of those are big, serious,
6 fundamental questions about who we are as a
7 people, how we get our food, what consumers
8 expect and the role that standards and labels
9 can play in creating a new kind of
10 agriculture.

11 We've been successful in doing
12 that and, you know, what -- that success has
13 been largely because of what's happened at
14 this table over the last 20 or more years.
15 That's it really. I mean I want to
16 acknowledge too the incredible tone of this
17 meeting. I think it's been one of our most
18 productive and collegial meetings that I've
19 been to in a really long time.

20 I think that's a testament to Mac
21 and Jean's leadership of this Board over the
22 last few years, and possibly a little bit the

1 power of bourbon. But I leave this meeting
2 with a lot of optimism for the future of this
3 Board and the work that y'all are going to do.
4 So thank you.

5 (Applause.)

6 MR. McEVOY: Okay. Now John
7 Foster. John Foster I've known for quite a
8 long time, when he used to be an inspector and
9 we used to work for Oregon Tilth and I guess
10 he was the executive director there for a
11 while. So I knew you there when I was at WSDA.

12 So he's been in the certification
13 and inspector world for a long time, and I
14 have a lot of respect for John in his work as
15 an inspector. Then he brought that experience
16 to more production organic agriculture, and
17 has brought all those experiences and
18 perspective to the Board, which I think has
19 been of immense value to the discussions and
20 to the Board, both that understanding of
21 organic production agriculture and the
22 certification and inspection process, of how

1 you can create standards that are verifiable
2 and have real meaning and will work in the
3 farms and handling and processing facilities.

4 So John, great work. Look forward
5 to working with you in the future, and best of
6 luck with your new family.

7 (Applause.)

8 (Off mic comments.)

9 VICE CHAIR FOSTER: Y'all know
10 what I look like, I think, anyway. So thank
11 you Miles for that. It's been a real
12 privilege. I've known you for I think almost
13 20 years now. So before I get going on
14 parting thoughts, I do also want to really
15 thank my family, which I don't do on a regular
16 basis here.

17 But as everyone in this room knows
18 and Jay said very, very well, it really takes
19 a toll. So I really appreciate that they've
20 supported me and supported the house while I'm
21 not there, and I'm not cleaning roof gutters
22 and I'm not doing dishes and I'm not going

1 grocery shopping and changing diapers, which
2 actually in an odd way I really do miss when
3 I'm not doing it.

4 Let's see. Also, I should also
5 thank my employer. Joe, you did a nice job
6 with that. I remember the day I asked Will if
7 it would be all right if I applied for the
8 position. He said "Oh yeah, that would be
9 great. Awesome, great." Then he paused. He
10 said "You still have to get all your work
11 done."

12 I'm like -- but yeah. Go do that.
13 Whatever you need to do, go do it. That's
14 fine. So you know, for every hour on a
15 conference call, you make it up, in the
16 evenings. You make it up on the weekend.
17 More of a toll on the family, as Jay said.

18 But they allowed a lot of
19 flexibility to get things done, a lot of
20 accommodation, and rearranged a lot of things
21 and a lot of people, because they knew the
22 value of the commitment to the community.

1 Also I want to echo the thanks to
2 the NOP staff, who work every bit as hard if
3 not harder than all of us too, and it shows in
4 the quality of the work and the quality of the
5 people that we're honored to work with. So I
6 really do appreciate sincerely all of the
7 program staff that support us.

8 So over the last five years, I
9 hold my tongue a little bit more than I really
10 want to. But so if I go on a little bit long,
11 Madam Chair, I hope you give me a little
12 indulgence. I will not go on ad infinitum, I
13 promise.

14 So not surprising to those who
15 know me, I'm going to make a lot of literary
16 and other cultural references in these
17 comments. Some are explicit, some are not,
18 some not so much. To those who are so
19 inclined, as in past years, feel free to send
20 me a list of those you can identify, and if
21 you get them all, I'll be delighted to buy you
22 some classic beverage at a future meeting, so

1 start writing.

2 One of my favorite poems in the
3 world starts with this. "Turning and turning
4 in the widening gyre, the falcon cannot hear
5 the falconer. Things fall apart, the center
6 cannot hold. Mere anarchy is loosed upon the
7 world. The blood dimmed tide is loosed, and
8 everywhere the ceremony of innocents is
9 drowned. The best lack all conviction. While
10 the worst are full of passionate intensity."

11 And there are times when I've been
12 sitting at this table -- that's the end of the
13 quote, by the way -- there are times where
14 I've been sitting here where I feel like that,
15 that things are just out of control, and this
16 -- that was -- that's a Yeats poem called the
17 Second Coming, and it was written right after
18 he turned 50 in the aftermath of World War I.
19 Things were pretty dreary in Europe.

20 But what it also talks about is
21 that's the nature of cycles. It's paradigm
22 shifts. It's spiraling, the nature of

1 spiraling evolution, and that's a promising
2 thing for me.

3 I have in the last five years been
4 a lot of things and called a lot of things.
5 But the ones I think of when I think of my
6 happier times are that I've gotten to be a
7 farmer, I've gotten to be an inspector,
8 horticulture teacher, a trainer of other
9 inspectors, a reviewer, administrative
10 processor, candle maker, bouquet maker,
11 chicken herder, egg gatherer, cert director,
12 executive director.

13 I've settled lawsuits. I've
14 solved problems, I've grown seed and tried to
15 be a good husband, brother, father, son,
16 friend. I've developed a real interest in
17 mixology, done a lot of painting, and I've
18 started making bitters and shrubs, and I've
19 gotten the word "threeve" into the public
20 record twice now.

21 Of course, I've quoted a lot of
22 the Big Lebowski in this setting. So while

1 I've heard a lot, you know, and I've heard a
2 lot of things that cause me a lot of angst,
3 I've also heard a lot of things that are some
4 of the most encouraging and brilliant and
5 thoughtful comments, certainly heartfelt, full
6 of passion and full of life, and that's been
7 a true privilege and honor.

8 That's the only thing that keeps
9 me an optimist actually, and even through the
10 darkest times. So the five years that we've
11 -- this group has been on the Board have been
12 Woodland, California, Madison, Wisconsin,
13 Seattle, Savannah, Albuquerque, Providence,
14 Portland, San Antonio and now Louisville.

15 Not one has been in Washington,
16 D.C., and I would love to have come back there
17 at some point. I think that would be just
18 fine. There's farms near D.C. as well.

19 I have a little book that my
20 grandmother put together, that talks about all
21 of the John Fosters in my family, back to
22 about 400 years ago actually in Scotland, and

1 all they did was raise sheep, lots of sheep.
2 Sheep, sheep, more sheep, and in the cemetery
3 in this little town where they're from,
4 there's grave markers that have family members
5 for another 200 years, and they raised sheep.

6 I have barrel coopers in my family
7 and I have lots of chicken farmers in my
8 family, and on another side that came from
9 Sweden, they got booted from Germany during
10 the Reformation and they farmed. What's
11 really I don't want to lose track of, that
12 even though a lot of us don't make our living
13 farming, most of us owe our whole existence,
14 our whole family's existence to farming at
15 some point.

16 None of us would be here without
17 farming, even if that's not what we do for a
18 living. So we all owe it, to the great
19 farmers of history that got us here. That's
20 where it starts for me.

21 I'm going to skip to my next
22 favorite piece of writing actually, from Erwin

1 Schrodinger. This is the thing that I found
2 when I was looking for more inspiration, and
3 it describes kind of how I feel about this
4 process we're in.

5 "Thus, you can throw yourself flat
6 on the ground, stretched upon Mother Earth,
7 with a certain conviction that you are one
8 with her and she with you. You are as firmly
9 established as invulnerable as she, indeed
10 1,000 times firmer and more invulnerable.

11 "As surely as she will engulf you
12 tomorrow, so surely will she bring you forth
13 anew, striving and suffering, and not merely
14 Sunday; now, today. Every day she is bringing
15 you forth not once but thousands upon
16 thousands of times, just as every day she
17 engulfs you a thousand times over.

18 "For eternally and always there is
19 only now, the one and same now. The present
20 is the only thing that has no end."

21 For me, it's easy to forget -- I
22 use the phrase a lot "get down in the weeds"

1 in this venue, and it's easy to forget the
2 context for me. I like the idea that we have
3 a long way to go, and we'll only get there
4 together. I like to remember that.

5 I'm going to close. I remain
6 optimistic because of a lot of great writers
7 and poets, but I also remain optimistic
8 because of a lot of people who are in this
9 room right now. All of these colleagues on
10 the Board, all of the people who I know in the
11 gallery are familiar faces, and it's --

12 I'm optimistic because of all of
13 that passion and all of that caring. Even if
14 it's a position I don't particularly agree
15 with, I have never lost admiration for the
16 passion and the intent. The intent is all
17 good, and that's optimistic for me.

18 Lastly, let me read -- what I'd
19 like to ask is not that we drop our opinions.
20 I don't really like that phrase "circular
21 firing squad." It's not a great image for me,
22 but I also don't know that that's really an

1 apt metaphor anymore. It's a pretty big
2 circle, and it would be sad if we weren't all
3 one circle anymore. I don't like to really
4 consider that.

5 But I guess what I'd ask is not to
6 forget our differences, but to focus on what
7 we agree on first, and when we talk in public,
8 think about what we -- talk about what we
9 agree on first, because a lot of comments that
10 I've heard over the years is that we share
11 more than -- we have more in common than what
12 separates us.

13 I would just ask that we talk
14 about that first. We don't often get a chance
15 to do that, and until we've had a little
16 opportunity in recent years to get together
17 more socially, ahead of the formal meeting, we
18 kind of forgot who each other were.

19 The moment that we were able to
20 spend a little time together before the
21 meeting proceeded is when I felt there's a
22 little change in recognizing the humanness in

1 each other. I think without that, we don't
2 have much of a chance of success in anything.

3 So I would encourage that. But I
4 know resources are limited. We don't always
5 have time to do that. But I would just ask
6 that we imagine what we could do if we spoke
7 to our common ground first, not casting aside
8 our opinions, not changing -- I mean not
9 letting go of those things that make us
10 different. That's important too.

11 But I'm just asking we go first to
12 our common ground, speak to our common goals
13 first. When we write for our publications,
14 write about that first. When you give
15 interviews, talk about that first. When we
16 work, work for that first.

17 Debate, agree to the commonalities
18 first and always get that -- use that starting
19 point, please. I know we will get to more
20 gritty differences and that's fine. But I
21 just wish we would start with what binds us
22 first.

1 You know, I'd like to -- I'd like
2 to read one last thing here, and those of you
3 who are here this morning will recognize it.
4 But I think it's different now. I'll read it
5 again. "The magnificent here and now of life
6 in the flesh is ours and ours alone, and ours
7 only for a time. We ought to dance with
8 rapture that we should be alive and in the
9 flesh and part of a living, incarnate cosmos.

10 "I'm part of the sun as my eye is
11 part of me. That I am part of my earth my
12 feet know perfectly and my blood is part of
13 the sea. My soul knows that I am part of the
14 human race. My soul is an organic part of the
15 great human soul, as my spirit is part of my
16 nation.

17 "In my own self, I'm part of my
18 family. There's nothing of me that is alone
19 and absolute except my mind, and we shall find
20 that the mind has no existence by itself. It
21 is only the glitter of the sun on the surface
22 of the waters."

1 So that was written, as I said
2 this morning, by D.H. Lawrence. I think it's
3 some of the nicest English language craft ever
4 put down on paper. A couple of other
5 Englishmen said it a little more plainly, and
6 it starts like this:

7 "I am he and you are he as we are
8 me and we are all together." It happens to
9 end with "I am a walrus, koo koo ka-choo."
10 With that, I thank you Madam Chair for your
11 indulgence. That was very indulgent of you
12 and I appreciate it, and all of your kind
13 words, your confidences, your humor, your
14 challenges, your passion, your cocktail
15 recipes and your commitment.

16 It's been a distinct pleasure and
17 a real privilege serving with all of you on
18 the Board. Thank you.

19 (Applause.)

20 CHAIR RICHARDSON: All right. May
21 the dude abide. Calvin, come on up. Calvin
22 has a few things.

1 DR. WALKER: Yes. I'll, if I may
2 just reside right here, and Colehour will get
3 help. About two months ago on an executive
4 call, I made the recommendation that as Board
5 members leave, they shouldn't just leave with
6 a plaque, but they should have an opportunity
7 to say some final words.

8 We are glad that the program and
9 the executive committee consented that we do
10 that, and there's a saying. "Be careful what
11 you ask for, because you might get it." So
12 the Chair, Dr. Richardson said "Calvin, that's
13 a good idea. We'll let you coordinate that."

14 So this is the final piece of
15 that. We want them to say words. First,
16 we're going to do -- this is on behalf of the
17 Board, 11 of us that are still here. We talk
18 about what John, Jay, Dr. Fulwider and yes Joe
19 have done.

20 What I'd like to do is start with
21 Dr. Wendy Fulwider. This particular
22 certificate reads "Well, the USDA National" --

1 CHAIR RICHARDSON: Microphone.

2 DR. WALKER: Pardon?

3 CHAIR RICHARDSON: Use the
4 microphone.

5 DR. WALKER: Yes. We, the United
6 States Department of Agriculture National
7 Organic Standards Board family, thank you for
8 your tireless service to the organic nation
9 and world. During your appointment, your
10 service was inclusive of the following." This
11 is for Dr. Fulwider.

12 2014 member of the Compliance,
13 Accreditation and Certification Subcommittee;
14 2010 through 2014 member of the Materials
15 Subcommittee; 2013 Vice Chair of the Livestock
16 Subcommittee; 2011 through '12, Chair of the
17 Livestock Committee, and we certainly hope
18 those welfare rules come out soon.

19 In 2010, 2012, 2013, she served as
20 the Secretary, and bear in mind that she
21 served as the Secretary where she didn't need
22 any help. As you can tell, since she was no

1 longer the Secretary, that myself, Mac, we've
2 all needed help in recording these votes. So
3 she was able to do it singlehandedly.

4 In 2010, she served as the Vice
5 Chair of the Livestock Committee. In the
6 final words, as we rotate off the NOSB, let us
7 view it not as a sunset, but a sunrise. This
8 is signed by all the current members of the
9 NOSB, and Colehour, we can give this to our
10 president for a photo op, and this is a token,
11 Dr. Fulwider, of your fellow Board members.
12 There's candy, it's apples, it's cheese, it's
13 some of everything.

14 (Applause.)

15 (Off mic comments.)

16 DR. WALKER: Okay, next. Joe
17 Dickson. It reads similar, a few words and
18 committees have certainly changed. We, the
19 United States Department of Agriculture
20 National Organic Standards Board family wish
21 to thank you for your tireless service to our
22 organic nation and world.

1 Some of the appointments that you
2 have served so faithfully include 2014 Vice
3 Chair of the Livestock Subcommittee; 2014 Vice
4 Chair of the Compliance, Accreditation and
5 Certification Committee; 2010 through '14
6 member of the Handling Subcommittee; 2010
7 through '13 member of the Livestock
8 Subcommittee; 2012 through '13 member of the
9 Policy Development Subcommittee; 2012 member
10 of the Policy Committee -- near the end.

11 2011 Vice Chair of the USDA
12 National Organic Standards Board; 2013 through
13 '11 Chair of the Compliance, Accreditation and
14 Certification Committee, and finally, in 2010,
15 he was a member of the Compliance,
16 Accreditation and Certification Committee.

17 We also have a bag and something
18 from your fellow Board members.

19 (Off mic comments.)

20 DR. WALKER: Next, John Foster.
21 It reads very similar at the beginning and the
22 end. "We the United States Department of" --

1 and also we thank John Foster for these
2 particular. Our names have been transposed to
3 a language he said he didn't know what it was.
4 So but it was uniquely done, and we appreciate
5 that.

6 He promised me that he would give
7 me the definition of twick, twerking and
8 tweaking, because I have them confused. "We,
9 the United States Department of -- the USDA
10 National Organic Standards Board family wish
11 to thank you for your tireless service to the
12 organic nation and world."

13 John's appointment include 2013-14
14 Vice Chair of the National Organic Standards
15 Board; 2013-14 member of the Policy
16 Development Subcommittee; 2014 member of the
17 Compliance, Accreditation and Certification
18 Subcommittee; 2013 and '14 Vice Chair of the
19 Handling Subcommittee; 2013-14 member of the
20 Corp Subcommittee; 2010 member of the Crops
21 Committee; 2010 through '11, Vice Chair of the
22 Handling Committee; 2010 through '12, member

1 of the Materials Committee; and 2011, Chair of
2 the Crops Committee. Just to show the number
3 of committees that he has so aptly served.

4 (Applause.)

5 DR. WALKER: Last but not least
6 Jay. The word that I best describe him, as
7 Colehour was mentioning, I used the word
8 "focused." The certificate reads "We, the
9 National Organic Standards Board family wish
10 to thank you for your tireless service to the
11 organic nation and world."

12 Some of the committees Jay have so
13 aptly served, 2013-14, member of the Policy
14 Development Subcommittee; 2010 through '14,
15 member of the Crop Subcommittee; 2013, Chair
16 of the Crop Subcommittee; 2013, member of the
17 GMO Ad Hoc; 2010 through '14, member of the
18 Materials Subcommittee.

19 2013, member of the Inerts Working
20 Group; 2010 through '12, member of the Policy
21 Development Committee; 2013, member of the
22 Policy Development Subcommittee; and 2010,

1 Vice Chair of the Materials Committee. It's
2 closed by "As we all rotate off NOSB, let us
3 view it not as a sunset, but a sunrise."

4 On behalf of all the subcommittees
5 of the NOSB, we want to say thank you for all
6 the work you've done.

7 (Applause.)

8 (Pause.)

9 CHAIR RICHARDSON: Is there any
10 other business to come before this meeting?
11 Is there any other business to come before
12 this meeting? Is there any other business?

13 (No response.)

14 CHAIR RICHARDSON: There being
15 none, right, we declare -- come on Miles -- we
16 declare this meeting is adjourned.

17 MR. McEVOY: The meeting to be
18 adjourned.

19 (Applause.)

20 (Whereupon, the above-entitled
21 matter went off the record at 2:27 p.m.)
22

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This is to certify that the foregoing transcript


In the matter of: National Organic Standards Board

Before: USDA

Date: 10-30-14

Place: Louisville, KY

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Court Reporter

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