

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

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MEETING OF THE NATIONAL ORGANIC
STANDARDS BOARD (NOSB)

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WEDNESDAY

OCTOBER 27, 2010

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The National Organic Standards
Board convened at 8:00 a.m. at the Best
Western InnTowner, 2424 University Avenue,
Madison, Wisconsin, Daniel G. Giacomini,
Chairman, presiding.

MEMBERS PRESENT

DANIEL G. GIACOMINI, Chairman

STEVE DeMURI

JOE DICKSON

KRISTINE "TINA" ELLOR

KEVIN K. ENGELBERT

JAY FELDMAN

BARRY R. FLAMM

JOHN FOSTER

WENDY FULWIDER

JENNIFER M. HALL

KATRINA HEINZE

TRACY MIEDEMA

JEFFREY W. MOYER

JOSEPH SMILLIES

STAFF PRESENT

MILES McEVOY, Deputy Administrator, National
Organic Program

MELISSA BAILEY, Director, Standards Division,
National Organic Program

LISA BRINES, Standards Division, National
Organic Program

MARK LIPSON, Organic and Sustainable
Agriculture Policy Advisor, Office of
the Secretary

ARTHUR NEAL, Director of Program
Administration, National Organic Program

EMILY BROWN ROSEN, Agricultural Marketing
Specialist

T-A-B-L-E O-F C-O-N-T-E-N-T-S

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Adjourn521

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

8:06 a.m.

MR. GIACOMINI: If we can bring the meeting back to order please.

All the Board Members are in their seats. Everybody in the gallery please find a seat. And if you need to continue conversations, please take them out in the hallway.

Thank you.

Today is, I believe, entirely public comment. We have a few items that we need to accomplish before the meeting is over that are not actually on the agenda. Presentations and things we're going to hope that was can get some of them in today.

I'd like to encourage the Board to try to have as much consideration and feeling for what's going on. The same concern in the morning session as they would for the late afternoon session between 5:00 and 9:00 p.m. We tend to be a little more freewheeling in

1 the morning. It's not a problem. But then
2 there's times in the evening when some people
3 begin to feel that we shouldn't have -- should
4 cut people off in time or not ask questions
5 and that's not fair to them either. So, let's
6 try and be as consistent as possible.

7 I do want to make one statement
8 regarding a statement that I made yesterday in
9 the sunset discussion on the time line for
10 resetting the sunset clock. I'm fairly sure,
11 I'm almost positive that a new listing for an
12 annotation change based on a complete
13 technical review would reset the clock. I'm
14 not sure if a re-listing based on a technical
15 correction would reset the clock. That may
16 not be considered a complete enough review by
17 the Board to reset it. But in my experience
18 of working with the government, it may be
19 determined that the re-posting of a new
20 annotation change is the re-posting of a new
21 annotation change and it's easier just to
22 start it over -- start the clock over. So,

1 that may be something that would adjust what
2 I -- Miles?

3 MR. McEVOY: Yes, we looked into
4 that this morning and we could -- if there's
5 an annotation change during sunset we would
6 just make it effective on the same date of the
7 sunset date so it would not reset the clock.
8 Just make it effective on the date -- the
9 sunset date. So, there's no need to reset the
10 clock if you change the annotation during the
11 sunset process.

12 MR. GIACOMINI: Okay. Thank you.

13 We are ready to proceed -- are
14 there any other announcements or comments?
15 We're ready to proceed with public comment and
16 I have only the screen behind me to know
17 what's going on. So, Charlotte, Julie and
18 John in the hole.

19 So, Julie, you will be --
20 Charlotte's first, you'll be going on this
21 podium. We have two podiums for the people
22 who were not here before. We're alternating

1 speakers. It does create some discomfort and,
2 you know, hair on the back of your neck but
3 standing up for some of the Board Members
4 where someone is talking right behind their
5 head. We apologize for that. They would
6 prefer to be able to look at them in the face
7 and we understand that. We're trying this to
8 see how much we can expedite the process with
9 two podiums. But there's always the
10 constraints that you have to work with
11 regarding the layout of the room and the
12 length of AV cords. So, we're doing the best
13 we can. If this doesn't work with two podiums
14 we'll go back to one or we'll try to change
15 something else next time. But we're seeing if
16 we can proceed with this at this meeting.

17 Thank you. Go ahead.

18 MS. VALLAEYS: Good morning.

19 My name is Charlotte Vallaeys. I'm
20 with the Cornucopia Institute.

21 First off I'd like to thank the
22 NOP for their April 2010 memo on Accessory

1 Nutrients and I urge you to set a firm
2 deadline for companies to come into full
3 compliance, especially formula and baby food
4 manufacturers who are currently putting
5 Marteks DHA and ARA in there.

6 We've become involved in this
7 issue because it was brought to our attention
8 that DHA and ARA, hexane-extracted ingredients
9 from algean soil fungus manufactured by Martek
10 Biosciences Corporation are not found in the
11 National List who are nevertheless being added
12 to organic infant formula.

13 We soon discovered reports have
14 been filed with the FDA of adverse reactions
15 to formula with these additives. Diarrhea,
16 vomiting and other gastrointestinal symptoms
17 experienced by infants disappeared as soon as
18 they were switched to the exact same formula
19 but without DHA and ARA.

20 I completely understand that one
21 of the major concerns is that by taking these
22 additives out of formula you are creating an

1 inferior product and that organic babies would
2 be missing out. I understand that concern
3 because that's exactly how I felt three years
4 ago when I started gathering scientific data
5 on this topic.

6 I was astonished to see a real-
7 life example of corporate interest influencing
8 science. Two independent scientists who
9 conducted meta-analysis studies published in
10 peer reviewed academic journals come to the
11 same conclusion. I will quote one of them.
12 "The results of most of the well-conducted
13 randomized clinical trials have not shown
14 beneficial effects of DHA and ARA
15 supplementation of formula milk on the
16 physical, visual and neuro-developmental
17 outcomes of infants." Dr. Beyerlein in
18 January 2010, Journal of Gastroenterology and
19 Nutrition, a completely separate independent
20 study review comes to the exact same
21 conclusion.

22 Scientific data does not support

1 the hypothesis that adding DHA and ARA to
2 infant formula is necessary or beneficial for
3 infant development. And this is why neither
4 the FDA nor the American Academy of Pediatrics
5 has recommended it. Why then are we led to
6 believe that DHA and ARA are necessary and
7 beneficial? Because it's a great marketing tool
8 and scientific data has been interpreted in
9 such a way that it leaves mothers to believe
10 that they have to buy the more expensive DHA
11 supplements in formula.

12 One example, again, just don't
13 take my word for it. A study led by a
14 scientists from Abbott Laboratories which
15 makes Similac formula found no benefits to
16 adding DHA and ARA. Yet in an article
17 published in Pediatrics they write --

18 MR. GIACOMINI: Charlotte, could
19 you please refrain from using company names?

20 MS. VALLAEYS: Oh, okay.

21 MR. GIACOMINI: Thank you.

22 PARTICIPANT: No, Mr. Chairman, I

1 need to hear --

2 MR. GIACOMINI: No. You're not
3 even at the podium now, Mark, so please sit
4 down. No. You're out of order. You're out
5 of order, Mark.

6 MS. VALLAEYS: Okay. This is a
7 public meeting and apparently I have the right
8 to say whatever I'd like.

9 MR. GIACOMINI: We are asking you
10 to -- you can state your issues, you can make
11 your points, but this is a public meeting.
12 It's on the public record. We are not a jury.
13 We're not a court of law. We're not any of
14 those things and we just -- we would
15 appreciate if you would please not use
16 specific company names and which would be
17 viewed as that type of an attack. That's all
18 we're asking.

19 The full policy is fine. Okay.
20 Miles?

21 MR. McEVOY: Yes. I don't see why
22 they can't mention company names. If it's in

1 the public record, why can't they mention
2 company names? You're making the request that
3 they don't but I don't see -- this is a public
4 comment period. They're able to express their
5 opinions.

6 MR. GIACOMINI: Okay. The Chair
7 has been overruled by the program. Please
8 proceed.

9 MS. VALLAEYS: The conclusion from
10 this article was they intentionally misled
11 pediatricians into believing that the
12 researchers found benefits they didn't.

13 As Will mentioned on Monday, the
14 infant formula manufacturers got these
15 additives into organics by lobbying the former
16 head of the NOP who then overruled her staff
17 which had concluded that they were not allowed
18 in organics.

19 This story that I just told of
20 hexane-extracted additives, insider lobbying
21 to bypass federal regulations, corporate
22 interest influencing science to get people to

1 spend money on things they don't really need.
2 All of that sounds like it's part of the
3 conventional food system. Organic is supposed
4 to be an alternative from that.

5 One mother, Suzanne Stock, gave me
6 permission to share her story with you. She
7 knew about the possibility of DHA causing
8 adverse reactions so she always bought Baby's
9 Only organic formula for her daughter which
10 does not contain Martek's oils.

11 When the family ran out of formula
12 she sent her husband to the store. And he
13 knew enough to look for the organic seal. But
14 he picked up a different kind of formula which
15 is organic but contains Martek's oils.

16 Their daughter experienced
17 diarrhea pretty much right away after drinking
18 her first bottle of this formula with DHA. And
19 it disappeared again immediately when she was
20 switched back to the Baby's Only formula.

21 Suzanne's husband was right about
22 choosing formula with the organic seal and

1 such incidents should not happen to organic
2 families. Please keep unnecessary and
3 potentially harmful ingredients out of the
4 organic food supply.

5 The standards as written are fine,
6 allowing vitamins and minerals which by the
7 way includes Vitamin K but do not open the
8 door to just about any synthetic accessory
9 nutrient out there.

10 Thank you.

11 MR. GIACOMINI: Thank you. We do
12 have one other announcement that I would like
13 to request. We have an additional
14 videographer in the room and if you could find
15 a program microphone I'd like you to please
16 state who you are so that we know -- or
17 actually the microphone there with the podium
18 Julie is at. Just state who you are and why
19 you're here.

20 MS. SHILL: Hi. I am Donna Shill.
21 I'm a University of Iowa student and this year
22 I'm working on my Master's project studying

1 organic farmers in Iowa actually. And I
2 thought it would add to my project to see how
3 decisions are made and was excited that you're
4 doing a meeting in the Midwest. So, that's
5 why I'm here.

6 MR. GIACOMINI: Joe.

7 MR. SMILLIE: Your focus on the
8 issue is that the hexane extraction that you
9 feel is the problem or the AHA/DHA?

10 MS. VALLAEYS: The hexane
11 extraction is how this issue was brought to
12 our attention initially. Right now the hexane
13 extraction is not the focus.

14 MR. SMILLIE: Okay.

15 MS. VALLAEYS: It's the fact that
16 an accessory nutrient not on the National List
17 which says vitamins and minerals was put into
18 organics and so that's why we're asking the
19 NOP to take enforcement action because we do
20 believe that right now they can do that based
21 on what the standards currently say.

22 And, second, asking the NOSB to

1 clarify that it's vitamins and -- vitamins and
2 minerals, but if you open the door to -- by
3 adding accessory nutrients to that, you would
4 open the door to -- I mean, if anything that's
5 FDA GRAS can be in organics which I know some
6 people have argued for it, you open the door
7 to just about anything out there.

8 MR. SMILLIE: Well, just to follow
9 up. I think we're clarifying what the
10 intention of the 1995 recommendation from the
11 NOSB to the program was and my understanding
12 is that it was allowing accessory nutrients.
13 So, I don't think it's necessarily opening the
14 door. The door may be open, although that's
15 what we're trying to clarify whether that door
16 was opened or not.

17 So, if an extraction of AHA from
18 an algal organism, you would still -- that
19 wouldn't change your opinion on the product
20 then? I'm just trying to --

21 MS. VALLAEYS: I'm sorry?

22 MR. SMILLIE: If there is a non-

1 hexane extraction of AHA/DHA from algal
2 sources in algae, that wouldn't change your
3 opinion on this?

4 MS. VALLAEYS: It -- I think if
5 it's an accessory nutrient I think it would
6 still need to be individually petitioned for
7 inclusion because currently the rule does
8 refer to 21 CFR 104.20. And meaning, it needs
9 to be required by the FDA, right, which this
10 isn't. Or it says recommended by an
11 independent professional organization, which
12 again I think you're going to run into
13 problems because what is an independent -- you
14 know, the American Academy of Pediatrics has
15 not recommended it. So, you know, it is an
16 organization that has some funding from the
17 industries that are independent or not because
18 that, again, is going to get very tricky.

19 MR. GIACOMINI: Tracy.

20 MS. MIEDEMA: Thank you, Mr.
21 Chair, and thank you, Charlotte, for sharing
22 your thoughts with us again.

1 There seems to be two issues each
2 time you've got up and given testimony. One
3 is the legalistic argument that nutrient
4 vitamins and minerals don't include accessory
5 nutrients. And we're really working hard on
6 that to understand exactly what is and is not
7 allowed and what was the intent of 95 and how
8 we're going to move forward.

9 It seems that there's another
10 issue that you persistently bring up and it's
11 this implication that people in this room
12 don't care about babies. And that there is
13 some sort of deliberate lack of care or love
14 for babies. And that, you know, that there's
15 even a machine that's working against babies.
16 And since you have put on the record, you
17 know, about these companies deliberately doing
18 things, I'd like to put on the record that
19 this room is just chock full of parents who
20 love babies and have absolutely no intent with
21 any of our discussions to ever do any harm.
22 And I wondered, do you take this argument to

1 American Pediatric Association because I
2 assume you care about all babies, not just
3 organic babies? And if these are really true
4 concerns about baby formula, it seems like
5 it's a much bigger question mark than an
6 organic question.

7 MS. VALLAEYS: Definitely. First
8 of all, I know from experience that this room
9 is indeed full of people who love babies. I've
10 experienced that over the past couple of days.
11 So, by no means am I, you know, would I by
12 what I'm saying that people don't love babies
13 and that it's intentional. I don't think that
14 at all.

15 Your second point. Yes, we have
16 done that. We are very concerned and this is
17 not just an organic issue. It's an issue for
18 all babies out there and, in fact, our Board
19 has questioned why as a farm policy group are
20 we getting involved in childhood nutrition by
21 doing things like, you know, we have contacted
22 the formula makers. We have shared these

1 reports with them and these are formula
2 manufacturers who are not even involved in
3 organics. And so we are working on the issue
4 of these adverse reactions in general, not
5 just in organics who are certainly involved in
6 that. But at the same time, as a farm policy
7 group we have to focus on the organic issue.

8 MR. GIACOMINI: Further questions?

9 Okay. Thank you, Charlotte.

10 Next up, Julie, John and Jim. I'm
11 trying to get this document from Lisa and
12 hopefully I'll just be able to just have it on
13 my screen here in a bit if we can get that
14 together.

15 Julie is next up. This reminds me
16 of another request I had yesterday. Just very
17 briefly, Julie is a former NOSB member. Went
18 off the Board this last year. I was able to
19 spend four years with her. The request was,
20 could we have all former members of the NOSB
21 and NOP staff that are in the audience to
22 please stand up so that we can all see who you

1 guys have all been over the years. There we
2 go.

3 (Applause.)

4 I think there were a lot more of
5 them two days ago. We've had a few additions
6 this morning and yesterday. Welcome. Thank
7 you for coming back and back to public
8 comment.

9 Julie.

10 MS. WEISMAN: Those other former
11 members are sleeping late because they can
12 nap.

13 Hello, everyone. I actually -- I
14 don't have to say who I am now because Dan
15 just introduced me. But I will. My name is
16 Julie Weisman and, yes, I am a former NOSB
17 member. And I thank you for this opportunity
18 to address you.

19 Now that I no longer have to worry
20 about conflict of interest in this room I am
21 finally free to speak on behalf of my
22 companies which I guess I can mention, Elan

1 Vanilla and Flavorganics who began producing
2 certified organic vanilla extracts,
3 concentrates and flavors in 1996 for both
4 commercial and retail use.

5 As a former member of the NOSB,
6 who participated in the first sunset review,
7 I'm acutely aware of the effort you are making
8 on behalf of the organic industry and of the
9 task before you.

10 At this time, I specifically wish
11 to address the matter of the continued listing
12 of flavors non-synthetic on 205.605(a). I'll
13 ask you to refer to my written comments for a
14 more detailed description of the growth of
15 organic flavors and I apologize for not having
16 a copy in front of all of you. The toner in
17 the business center wasn't doing so well at
18 2:00 this morning.

19 But for now, suffice it to say
20 that in 14 years we have gone from one
21 manufacturer that were my companies to what
22 according to one certifier's recent estimate

1 is 30 certified operations offering 1,500
2 different flavor formulations. It seems as if
3 this ought to meet anyone's definition of
4 commercial availability. Yet despite the
5 breadth of certified organic flavors now
6 available, many certified organic food and
7 beverage makers do continue to use what are
8 called in the flavor industry, NOP-compliance
9 flavors, aka flavors non-synthetic.

10 I'm starting to sound like a hop
11 grower right now, right? But it would be
12 difficult to discover the exact percentage,
13 but go with Katrina the next time for a trip
14 down the grocery aisle and you'll see.

15 As long as the current listing of
16 flavors non-synthetic remains unchanged, and
17 it's the current position on 605(a) where they
18 are immune from commercial availability
19 requirements, there is little motivation for
20 some -- there's no motivation for some makers
21 of organic products to switch to certified
22 organic flavors. And I say some because there

1 are certainly organic product makers who have
2 always gone beyond what is required and it was
3 one such maker that actually pushed my company
4 to develop organic extracts in the first
5 place.

6 So, anyway, there's a strong case
7 to be made for allowing flavors to sunset from
8 the National List. But that is not what I am
9 here to do today. I am here to support the
10 handling committee's recommendation to relist
11 flavors non-synthetic. What? Is she crazy?
12 Why would she do that? Here's why. I'd like
13 to bring to the attention to the NOSB, the NOP
14 and the organic industry a little known fact
15 for your consideration.

16 Most, though not all, certified
17 organic flavors make use of flavors non-
18 synthetic as is currently listed within five
19 percent of nonorganic ingredients that are
20 allowed.

21 If flavors were to sunset
22 completely with no other accompanying rule

1 change such as, I mean, additions to the
2 National List, the vast majority of currently
3 certified organic flavors would need to be
4 reformulated in such a way that organic food
5 makers and consumers would find the flavor
6 profiles of their products substantially and
7 negatively altered.

8 Given that this is the case, there
9 are two -- not only but I would like to
10 outline two possible courses of action.

11 One, allow flavors non-synthetic
12 to sunset requiring flavor manufacturers to
13 petition 100 to 200 individual flavor
14 ingredients onto 605(a), (b) and 606 in order
15 to avoid a major disruption to organic
16 commerce. And requiring the NOSB to consider
17 those petitions. So, dropping -- the zeal to
18 drop one item from the National List would
19 prompt potential addition of hundreds of new
20 items in order for commerce to continue. And
21 in order for the demand for organic
22 agricultural products to continue, more

1 importantly.

2 Both options require that the
3 industry petition the NOSB for either the
4 addition of new materials or a change of
5 annotation. And yesterday's discussion on
6 Sunset Review policy notwithstanding. I wrote
7 these comments before that discussion
8 happened.

9 So, the first option. Sunset date
10 of October 2012 seems far enough away to allow
11 time to bring the necessary petitions before
12 the Board. But it would be a huge gamble. You
13 know, most of you, the amount of time it takes
14 to consider the volume of petitions that would
15 have to be generated for a 100 flavor
16 ingredients to be placed on the National List.
17 And so for this reason I believe the second
18 alternative is the best way to raise the bar.

19 So, please refer to my written
20 comments for more detail. I do want to end by
21 making two offers. It's my intention to bring
22 such a petition, either individually or with

1 a group before the Board, and I volunteer to
2 participate and would perhaps even be willing
3 to co-chair any working group that might be
4 formed to do a more thorough review of the
5 category as you described in your
6 recommendation.

7 MR. GIACOMINI: Thank you.

8 Questions, comments?

9 Steve.

10 MR. DeMURI: Julie, thank you very
11 much for your comments and as you and I have
12 talked in the past, flavor has been on our
13 work plan for, you know, a couple of years
14 now. Kind of on the back burner. Now that
15 we're getting through all these sunset items,
16 it will rise to the top -- near the top at
17 least. So, I appreciate your offer to help us
18 with that because we will definitely take you
19 up on that.

20 MS. WEISMAN: Thank you.

21 MR. GIACOMINI: Julie, in your
22 experience on the Board would most of those

1 substances that you would look at that would
2 need to be added, especially because of their
3 processing and everything else would require
4 a TR?

5 MS. WEISMAN: A lot of them would.

6 MR. GIACOMINI: Okay.

7 MS. WEISMAN: Yes.

8 MR. GIACOMINI: That's also a
9 substantial factor.

10 Any other questions/comments?

11 Katrina.

12 MS. HEINZE: I just wanted to
13 thank you, Julie, for helping to articulate
14 why flavors is complicated. Not being a
15 flavor person, it's been hard for me to
16 explain. So, I really appreciate the
17 perspective that you brought.

18 MR. GIACOMINI: Comments and
19 questions? Are we ready on the next podium
20 please whoever is -- oh, there you are. I'm
21 sorry. I didn't see you sitting there.

22 MR. PECK: That's fine.

1 MR. GIACOMINI: Thank you, Julie.

2 So, John, Jim and then Richard.

3 Go ahead, John.

4 MR. PECK: My name is John Peck.

5 I'm the Executive Director of Family Farm
6 Defenders. We're a national group based here
7 in Madison. We have about 5,000 members in
8 all 50 states, Canada and Mexico. And we've
9 been involved with defending organic integrity
10 since the founding of our group years ago. We
11 were one of the first group to oppose bovine
12 growth hormone and the attempts to put bio-
13 tech into the organic standard way back when.

14 I was here mostly to speak on
15 three different topics. One is the organic
16 hops concern. We have many growers here in
17 Wisconsin now going into organic hops and
18 they're very concerned and now I guess it's
19 okay to mention corporations. Anheuser Busch,
20 just because they're the largest beer brewer
21 in the world should not be dictating organic
22 hop rules at the Organic Standards Board.

1 There are going to be organic hops
2 available. We should not make a loophole so
3 they can find other hops.

4 On the issue of nanotech. We're
5 very concerned that nanotech is even being
6 considered. It should not be approved at all.
7 We've had the same problems, the substantial
8 equivalence arguments that Michael Taylor
9 brought up at the FDA years ago for biotech.
10 Nanotech is not -- should not be approved at
11 all. They already are using two million
12 pounds of titanium dioxide in our food supply.
13 Under the GRAS rules, GAO came out with a
14 report in February showing that GRAS is a huge
15 loophole for food safety concerns in this
16 country.

17 The European parliament is
18 considering a ban on nanotech in all food. We
19 can kiss organic exports goodbye if we put
20 nanotech into our organic food. So nanotech
21 should not be even on the plate for
22 consideration by this body. I hope you reject

1 any further discussion of nanotech as part of
2 organic.

3 The last point I want to bring up
4 is pasture rules. Many of our farmers, our
5 organic dairy farmers, some of them are
6 pioneers of the organic dairy movement in
7 Wisconsin. They are very concerned about the
8 pasture rule not being adequately enforced.
9 Still is not being adequately enforced. We've
10 been trying to get enforcement for years.

11 Cows eating chopped food on a
12 concrete tarmac is not grazing. Lactation is
13 not a stage of production. That should be
14 exempt from organic rules, including pasture
15 access. And now we're dealing with the same
16 situation with eggs and the poultry industry.

17 I grew up on a farm in Minnesota.
18 I was one of the investigators for Cornucopia
19 on this report. I went and visited farms. I
20 was very proud to find large-scale organic egg
21 producers in Minnesota who are using pasture.
22 You saw some of the photos I took yesterday

1 apparently at the Shultz Farm near Owatonna.
2 He as 5,000 chickens out on pasture. It's not
3 a hobby operation. But he is being driven out
4 of business by fake organic production
5 facilities. His eggs go all the way to Texas
6 he told me. North Dakota, Minnesota,
7 Wisconsin, Texas. So, that is not a hobby
8 farm. But, unfortunately, as long as they
9 don't enforce genuine organic standards in the
10 poultry industry in egg production, he is not
11 going to be able to stay in business. And I
12 spent over two hours talking with him about
13 the struggles he has.

14 He has been in organic egg
15 production for a long time and we need to
16 really respect the hard work of these farmers.
17 I mean, I grew up on a farm. I did pasture
18 chickens as a kid. That's how I made money
19 for FFA. It's work, but we need to give these
20 producers a fair shot at the marketplace. And
21 by not enforcing these pasture rules, not
22 enforcing, you know, standards, it just makes

1 -- it really jeopardizes consumer confidence
2 and integrity to the organic standard.

3 And I was in Copenhagen in
4 December, the Climate Change Conference. And
5 sad to say, a lot of Europeans -- their
6 opinion of U.S. organic is not as good as it
7 once was. And that's unfortunately a market
8 we'd like to be involved with. If you have
9 any questions.

10 Thanks for the opportunity to
11 speak today.

12 MR. GIACOMINI: Questions,
13 comments?

14 MR. SCHAHCZENSKI: Yes, just for
15 the record, while we're bashing everybody
16 these days.

17 Anheuser Busch doesn't produce an
18 organic beer anymore. I don't really drink
19 their beer and I'm not a big Anheuser Busch
20 fan. But they had nothing to do with this
21 issue. In fact, Anheuser Busch signed on to
22 the hops petition for organic hops just to

1 make the record clear.

2 MR. PECK: Well, that's after they
3 had gotten -- I'd talked to some independent
4 brewers here in Wisconsin. They said that
5 they were pushing -- they wanted to have a
6 loophole originally and then they got pressure
7 and maybe they changed their mind. But that's
8 not what I heard from talking to microbrewers
9 here in Wisconsin.

10 MR. SCHAHCZENSKI: Well, we got
11 the original petition and it wasn't from
12 Anheuser Busch as was falsely reported. It
13 was from a smaller organic brewery but anyway
14 --

15 MR. GIACOMINI: Joe, there were --
16 there were two petitions for hops submitted to
17 the program which in 2007 -- 2006/2007. One
18 of them was from Anheuser Busch but it was
19 never deemed to be complete. It was not
20 presented to this body. And it was not what
21 we reviewed to put hops on the list and I
22 don't even -- I don't recall but I'm not aware

1 that Anheuser Busch had any public comment on
2 this or made any statement at all that
3 influenced this Board's decision in any way.

4 MR. PECK: Okay. Well, that's
5 reassuring but I'm still concerned about
6 what's happening in the industry.

7 MR. GIACOMINI: Miles.

8 MR. McEVOY: Yes, just a comment
9 about the EU organic standards. There is some
10 perception in Europe that the U.S. standards
11 aren't as strict, but that is a misconception.
12 U.S. standards are much more strict than the
13 European standards in terms of European
14 standards allow antibiotics in nonorganic feed
15 for livestock production and they certainly
16 don't have anywhere close to the oversight and
17 enforcement capacity that the NOP has. So, I
18 just want to put that into the record.

19 MR. GIACOMINI: Further questions?

20 Okay. Thank you.

21 Excuse me, Jim. Jim, Richard and
22 Jeff in the hole.

1 MR. RIDDLE: Thank you. Thanks
2 for the opportunity to comment.

3 My name is Jim Riddle. I work as
4 Organic Outreach Coordinator, University of
5 Minnesota. I also was an organic inspector
6 for 20 years and founding chair of the Organic
7 Inspectors Association and served my term on
8 the Board. Thanks for the acknowledgment of
9 that.

10 And, first, I'd just like to thank
11 the outgoing members for your service and to
12 all the NOSB members for your hard work
13 leading up to this meeting once again. You'd
14 think it would get easier but it doesn't.

15 I was going to comment on hops but
16 it appears the Board is doing the right thing
17 so I'll just say cheers on that one. But I
18 will comment on the corn steep liquor and it's
19 not in my written comments.

20 Just a couple of things on that. I
21 think the Board should really focus on the
22 first part of the definition of synthetic

1 that's in OFPA and the NOP and that is a
2 substance that's formulated or manufactured by
3 a chemical process or -- you're focusing on
4 the chemical change aspect. The first part
5 is, is it manufactured by a chemical process?
6 I think everyone can agree that, yes. Corn
7 steep liquor is manufactured using a chemical
8 process. And the analogy is not hair or
9 holding hands but fish. Fish emulsion. It's
10 on the National List. It appears natural. You
11 could soak fish in water and have fish
12 emulsion. But once you've added an acid it
13 became synthetic and had to be petitioned and
14 on the National List. It's a direct analogy
15 to what you're considering today.

16 I did submit some comments to the
17 Livestock Committee on apiculture draft which
18 I really appreciate. I had chaired the
19 working group that did the initial work on
20 that. I think you've done some excellent
21 improvements from that original work. Have
22 some specific language changes. I'm

1 suggesting -- I'm not going to go through
2 those orally right now except to say I do
3 think there should be a clear prohibition on
4 maintaining organic and conventional hives at
5 the same BER. That's not in the draft and I
6 think it would strengthen it and be a good
7 step to prevent contamination and potential
8 co-mingling.

9 On the nanotech, for the Materials
10 Committee, a few issues with your draft. I
11 think it's really good work. You say in there
12 that the nano materials are synthetic
13 particles that should be prohibited. Well as
14 synthetic materials they actually are
15 prohibited. And I would ask that you correct
16 that. Not that they should be. They actually
17 are prohibited and in the draft there's no
18 mention of language that's both in OFPA and
19 the Rule pertaining to packaging materials,
20 storage containers and bins. They're
21 prohibited if they contain synthetic
22 fungicides, preservatives or fumigants. And

1 the nanomaterials if added to packaging would
2 be added for those functions so they're also
3 prohibited in packaging if those are
4 functions. And I just on your current draft
5 I suggest one change on the second to last
6 bullet point where it says "whether compliance
7 is possible." Change that word "whether" to
8 "how" compliance is possible. And that's a
9 summary.

10 I guess, you know, I was reading
11 through all the draft recommendations and
12 everything was going fine until I hit the one
13 from the CACC creating this new label -- front
14 panel label claim "certified to USDA
15 regulations." Now it's been changed. I
16 really feel that that is deeply flawed and
17 should be either removed, tabled or rejected.

18 It's based on some really quite
19 unsubstantiated claims that should be
20 substantiated if they are indeed true. It
21 says that most organic producers have chosen
22 to use the USDA's seal. Well, in the Midwest,

1 most organic products are actually, you know,
2 being sold by farmers are bulk commodities.
3 Grains, beans, milk. They don't carry the
4 USDA seal. And a lot of the organic producers
5 at farmers markets don't display the USDA
6 seal. So, there would need to be some factual
7 analysis to back up that claim.

8 It also says that the actual size
9 of the organic products market is
10 underestimated due to the amount of Made with
11 Organic products that are sold without any
12 substantiation. And I would posit that the
13 opposite is probably true where a lot of made
14 with products are being counted as organic.
15 And if you shift to giving the made with
16 category this front panel status of saying the
17 word "USDA" you're going to have manufacturers
18 moving more to that because they can cash in,
19 sell at a higher price without going to the
20 full USDA organic level.

21 MR. GIACOMINI: Questions,
22 comments, John.

1 MR. FOSTER: Thanks, Jim for
2 pointing out that the Materials Committee
3 recommendation closes the door on nanotech by
4 calling it synthetic. Thanks for pointing
5 that out.

6 Also, I have a question. When
7 juice manufacturers use ascorbic acid, right,
8 which is a synthetic on the National List, is
9 that in your opinion -- I think this is yes or
10 no. I think. I am phrasing it that way on
11 purpose. Is that juice synthetic as a
12 function of the addition of synthetic ascorbic
13 acid?

14 MR. RIDDLE: Is it being used as a
15 farm input because that's really where the
16 synthetic/non-synthetic paradigm applies. It
17 depends on the use.

18 MR. FOSTER: We will get to that
19 question later. My question is, is that juice
20 synthetic by virtue of the use of synthetic
21 ascorbic acid, in your opinion?

22 MR. RIDDLE: I don't have an

1 opinion on that. I'd need to know more
2 information.

3 MR. FOSTER: Okay. Thanks.

4 MR. RIDDLE: How it's going to be
5 used.

6 MR. GIACOMINI: Questions,
7 comments?

8 Okay.

9 MR. FELDMAN: Thanks, Jim.

10 I guess I need to return to your
11 question, John, about closing the door by
12 virtue of defining nano as synthetic. Is that
13 a correct characterization of what it is?

14 MR. RIDDLE: Well, I think if the
15 recommendation were strengthened and the
16 language cleaned up a little bit I think it
17 would for the time being take the steps
18 necessary to close the doors. But, yes, we
19 need a lot more training information,
20 knowledge to keep that door closed. But I
21 think it's a good first step and sends the
22 right signal if it's tightened just a little

1 bit. I think it sends a signal to consumers
2 that nanotech is not allowed.

3 MR. FELDMAN: Can I have another
4 question please?

5 MR. GIACOMINI: Yes.

6 MR. FELDMAN: Thank you.

7 You mentioned the fish emulsion. I
8 love the analogies. We're all looking for a
9 clean analogy that we can relate to on this on
10 the CSL issue.

11 Do you think that the effect of
12 that decision if it were to be deemed non-
13 synthetic would cause other previous decisions
14 to have to be reversed such as fish emulsion?
15 Are there any other examples?

16 MR. RIDDLE: Well, I think fish
17 emulsion sets the precedent for something that
18 appeared natural but in analysis was deemed
19 synthetic and therefore -- and then went
20 through the review process and appeared on the
21 National List. So, it's clear to everyone
22 that it is allowed.

1 So, I don't think it means you go
2 back. You deal with the topic at hand but the
3 precedent is already there with fish emulsion,
4 aquatic plant extracts, other things that
5 start off natural but some acid or base has
6 been added.

7 MR. FELDMAN: Well, I guess, we
8 rely heavily on previous Board decisions. It
9 seems to be the default in a lot of our
10 decision-making but if, in fact, this Board
11 were to set the precedent of defining corn
12 steep liquor as non-synthetic, even though
13 we're adding a synthetic into the
14 manufacturing process, would that -- for
15 consistency sake, would that at least require
16 to some degree us revisiting these issues
17 around fish emulsion and other extracts?

18 MR. RIDDLE: It would reverse the
19 precedent. You know, I can't predict what it
20 would take to revisit but the precedent has
21 been set.

22 MR. FELDMAN: But you say it would

1 inconsistent.

2 MR. RIDDLE: It would be
3 inconsistent for sure.

4 MR. FELDMAN: Very good. Thanks.

5 MR. GIACOMINI: Jim, I don't know
6 if there's any other questions.

7 Could you for the sake of our
8 time, could you please get at least to me
9 those references in OFPA and the Rule
10 regarding packaging and bins and all that kind
11 of stuff? The specific notation?

12 MR. RIDDLE: They are in the
13 written comments I circulated.

14 MR. GIACOMINI: Okay. Ill try to
15 pull that out.

16 MR. RIDDLE: In Point Number 3.
17 You mean as it applies to nanotech?

18 MR. GIACOMINI: Yes.

19 MR. RIDDLE: Yes. They're right
20 there.

21 MR. GIACOMINI: Okay. All right.
22 Good.

1 MR. SCHAHCZENSKI: Hold on, one
2 more question.

3 MR. GIACOMINI: Save my sanity.
4 But a couple of the other corrections aren't,
5 Jim.

6 MR. RIDDLE: Right. How rather
7 than the whether?

8 MR. GIACOMINI: Right. I was
9 hoping, Joe, that Board Members --

10 MR. RIDDLE: I think we can find
11 that one.

12 MR. GIACOMINI: We can find that
13 one and, yes. Okay. Yes. It's just that the
14 annotation, I mean, the citations that I'm
15 concerned with not having to read through 300
16 pages tonight.

17 Jay.

18 MR. FELDMAN: Thanks. Another
19 question on sunset. Given your vast
20 experience dealing with these issues, what's
21 your sense of the sunset proposal and moving
22 forward on that?

1 MR. RIDDLE: Yes. Unfortunately,
2 my time sunsetted before I got to that issue.
3 But I was on the Board when we formulated the
4 original proposal for the sunset process. And
5 I actually was the person who was very firm
6 that annotations are not open to change during
7 sunset. And I'm sorry for that. Because it's
8 left us stuck with bad annotations.

9 I think there should be some
10 flexibility to correct them and the Board has
11 the authority to further restrict them. But I
12 was very concerned that annotations would not
13 -- that uses would not be expanded either
14 inadvertently or deliberately without going
15 through the full review process during sunset.
16 And so that's why I really was firm about
17 that.

18 But, no. I think your
19 recommendation corrects that, allows the Board
20 some flexibility to make -- to improve the
21 annotations during sunset. But without -- but
22 you still draw a line so that they can't --

1 uses cannot be expanded during that process
2 without a full review.

3 MR. GIACOMINI: Any other comments
4 or questions?

5 Thank you.

6 Okay. Richard, Jeff and John with
7 a proxy.

8 MR. SIEGEL: Okay. Good morning.

9 I'm Richard Siegel of Washington,
10 D.C. Richard D. Siegel Law Offices, an
11 attorney. I'm not going to speak about yeast
12 this morning even though that may be my
13 billing.

14 I was not planning to use my time
15 for yeast. However, while since arriving at
16 the meeting I was contacted for the first time
17 by a company that asked for my assistance on
18 another matter pending before the Board
19 through the Handling Committee. And these are
20 two materials that on 605(a) -- 605(b) for
21 sunset. The glycerides and silicon dioxide.
22 The company that I'm speaking for at this time

1 is RIBOS, an organic ingredient manufacturer
2 in St. Louis that has a produce called Nu-
3 RICE, N-U-R-I-C-E, which is an organic rice
4 alternative to glycerides and silicon dioxide.

5 Now, I will first talk about
6 glycerides and then silicon dioxide.

7 On glycerides I heard the
8 discussion yesterday. I gather that the
9 Handling Committee wants to continue to
10 consider the sunset decision for glycerides
11 because of public comments.

12 One of the public comments that
13 has been received -- that was received prior
14 to the deadline was from Richard Theuer in
15 which he said that as a member of the original
16 Board that determined the listing for
17 diglycerides if he knew at that time that
18 there had been an organic rice alternative,
19 their vote would have had a different outcome.

20 Now, there were several comments that were
21 submitted on diglycerides by the deadline.
22 The company that asked for my assistance has

1 given me additional comments which it
2 collected but did not manage to submit by the
3 deadline. So, I have brought these comments
4 here. And if they're circulated to the Board
5 in some way so that they can be in their
6 books, I have 30 comments here for that.

7 The second point -- the second
8 topic is silicon dioxide. Now, in light of
9 the discussion yesterday, there is support to
10 continue the listing of silicon dioxide under
11 the sunset because a petition is pending to
12 remove silicon dioxide.

13 There were additional comments on
14 silicon dioxide that were also collected but
15 not submitted by deadline. I did not bring
16 them to this meeting, to this session this
17 morning, but I can see that they're filed and
18 through the appropriate vehicle. Maybe by
19 just sending them to the website post the
20 meeting.

21 So, those are the two matters that
22 I have and I thank the Board very much for all

1 its work and for all its patience and I have
2 been sitting through a lot of the meetings and
3 I know that the Board has to sit through even
4 more than I do. I can at least cherry pick
5 what I'm going to listen to. But the Board
6 has to listen to everything. And that's a
7 very admirable and a very diligent performance
8 on the part of the Board.

9 Thank you very much.

10 MR. GIACOMINI: Questions and
11 comments?

12 Thank you, Richard.

13 Next up Jeff, John and Julie.

14 MR. SCHAHCZENSKI: Good morning.

15 My name is Jeff Schahezenski.

16 First of all, I want to invite everyone in the
17 room, including the Board, to a great meeting
18 next week because you're going to need a
19 vacation to Montana. Beautiful Montana and
20 not at least of which we're going to have
21 Maria Rodale. We're going to have Robert
22 Quinn, a former member of this Board. And

1 last but not least, Barry Flamm will be there.
2 So, you're all invited to Montana next week
3 and we have a great program.

4 My name is Jeff Schahczenski. I'm
5 a Program Specialist at the National Center
6 for Appropriate Technology, a national
7 nonprofit organization.

8 I want to take a few minutes today
9 to inform everyone about a new joint project
10 between the National Organic Program and the
11 National Center for Appropriate Technology.

12 The outcome for the project will
13 be a set of publications which will be helpful
14 for certifiers as well as organic and
15 transitioning farmers.

16 NCAT's mission is to help people
17 by championing small-scale local and
18 sustainable solutions to reduce poverty,
19 promote healthy communities and protect
20 natural resources.

21 Our work on organic agriculture is
22 an important part of that mission. The

1 organization has nationally recognized
2 programs in sustainable agriculture and
3 renewal energy as well as successful track
4 record for state and regional projects. We
5 have offices in Montana, Arkansas, California,
6 Iowa, Pennsylvania and now Texas.

7 Many of you are familiar with
8 ATTRA, the National Sustainable Agriculture
9 Information Service, ATTRA provide free
10 information to farmers through a toll-free
11 information line, over 350 publications and a
12 website which millions of visitors frequently
13 visit each year.

14 Through ATTRA, I and other
15 specialists answer questions related to
16 organic certification, marketing and
17 agriculture which we receive by phone, email
18 and on the web.

19 This summer a cooperative
20 agreement was signed to allow NCAT to develop
21 compliance tools for organic agriculture
22 producers and certifying agents. Many of

1 these publications were developed several
2 years ago and are being revised and updated to
3 reflect new standards. These materials will
4 be available both on the National Organic
5 program and ATTRA websites and will be
6 available through hard copy through request to
7 NCAT's ATTRA project.

8 The publications are as follows:

9 Understanding the NOP Access to Pasture Rule.
10 This is a new workbook for livestock producers
11 that explains the calculations that will be
12 needed for ruminant livestock feed and
13 provides worksheets that will simplify the
14 calculations for the farmer.

15 Organic System Plans for both crop
16 production, ruminant livestock and nonruminant
17 livestock. The system plan templates are
18 primarily for the convenience of the
19 accredited certifier agencies. Some ACAs may
20 choose to use these templates where certifiers
21 may choose to design their own.

22 The templates were reviewed and

1 approved by the National Organization Program
2 before they were posted.

3 Inspection Report Forms for crop
4 production, ruminant livestock and non-
5 ruminant livestock. The Inspection Report
6 Forms are primarily for certifiers and
7 inspectors. They will be designed to be
8 parallel with the organic system plans.

9 This will be reviewed and again
10 approved by the National Organic Program
11 before they are posted.

12 Documentation forms for livestock
13 producers. The documentation forms assist
14 producers with the record-keeping required for
15 organic operations. Organic Certification
16 Workbooks again for crop production and
17 livestock production. The two workbooks are
18 geared toward farmers, new to organic
19 agriculture. They explain the certification
20 process and serve as a guide to the national
21 organic standards.

22 And number six, compliance

1 checklists for producers, again for crop
2 production and livestock production. In the
3 checklist, there are a series of questions to
4 help farmers assess whether their operation
5 complies with the National Organic Program
6 standards.

7 And we'd be happy to answer any
8 questions and feel free to contact us anytime
9 about this.

10 Thank you.

11 MR. GIACOMINI: Questions and
12 comments?

13 Thank you.

14 John, Julia and Amelia please.

15 You're ready to go.

16 MR. PECK: The dairy farmer I was
17 hoping to be here is not here. So, I'd like
18 to yield the time -- I guess he must still be
19 milking his cows -- yield the time to a future
20 farmer in the afternoon which I'm sure
21 Cornucopia can identify at that time.

22 Thanks.

1 MR. GIACOMINI: Okay. I am not
2 sure that fits into our schedule but we will
3 see.

4 MS. WEISMAN: Hello. It is me
5 again, Julie Weisman. I'm a former NOSB
6 Member who chaired the Handling Committee for
7 several years. I was also Vice Chair of the
8 Board for the time and my comments now are my
9 personal opinions and do not represent those
10 of my company or other groups of which I may
11 be a member.

12 Thanks again for this opportunity
13 to address you. It is killing me that I can
14 no longer be recognized by the Chair. This is
15 like now the only way -- one of the only ways
16 I can make my opinions heard. It's hard. And
17 I also want to say that I have new and deep
18 respect for the commenters I have been
19 listening to for the last five years.

20 It is hard to keep to five minutes
21 on a subject about which one feels
22 passionately. And commercial availability,

1 606, is one such subject for me.

2 I originally promised Joe that I
3 would address this issue because, at the time
4 about a month ago, he was being skewered along
5 with the program in the media for recommending
6 the relisting of hops. But the beauty of this
7 participatory transparent process with
8 adequate advance notice and public comment --
9 you can tell I love it. Right? Is that the
10 matter seems to have been somewhat amicably
11 resolved for all parties at least for now.

12 Also, I was challenged by our
13 deputy administrator a couple of weeks ago to
14 provide proof of my strong belief that listing
15 materials is an incentive, not a bar to the
16 development of organic alternatives to listed
17 substances.

18 Miles, I'm still working on the
19 facts you asked for. I do believe that I
20 provided some metrics in my previous comments
21 on flavors. The sound bite would be 1 to
22 1,500 in 14. That's one organic certified --

1 one certified organic flavor to 1,500
2 certified organic flavors in 14 years.

3 I would like now to turn back to
4 hops as a case in point.

5 First of all, I would like to say
6 that hops are not just hops in my opinion and
7 I'm not involved in growing hops or brewing
8 beer. But I see them as flavors in a way. I
9 hear brew masters talk of notes contributed by
10 different variables the same way I hear
11 flavors talk about notes of different flavor
12 ingredients that they add to their most prized
13 and secret formula.

14 There will surely be other
15 instances in which something was put onto the
16 list as a single substance but progress
17 towards full commercial availability and de-
18 listing will only be made in a step-wise
19 fashion, form by form.

20 Lecithin and flavors to name two
21 also seem to be taking this course.

22 Secondly, the issue is not only

1 whether or not it is possible to produce high-
2 quality hops via organic production, that's
3 not even a question at this point, it is a
4 fact in the field. But a question that is
5 just as important is whether it is possible to
6 produce high-quality beer with the varieties
7 that are currently available? So, what's
8 possible isn't always the same thing as what's
9 actually happening at any given moment. And
10 all this is to say that commercial
11 availability should not be seen as an event
12 but as a dynamic, even a dialectical process
13 between ingredient producers and the makers of
14 organic products.

15 But back to my main point. That
16 listing is an incentive, not a bar. Clearly,
17 since 2007 -- since the listing in 2007 of
18 hops on 606, the number of varieties available
19 and the number of regions where it's being
20 cultivated have expanded. This is the outcome
21 that we hoped would result from listing on 606

22 The fact that brewers do not yet

1 have all the tools they need available to them
2 should not be viewed as evidence that listing
3 on 606 is a disincentive to the development of
4 organic alternatives, if anything, the fact
5 that so many organic hop growers have been
6 clamoring both before this meeting and at this
7 meeting for the listing not to be renewed is
8 evidence of just how well listing on 606 works
9 as an incubator for even minor ingredients.

10 I do not dispute that there are
11 some amount of specing out that goes on and
12 this goes to another point about commercial
13 availability that I cannot stress enough.

14 I believe that the way to address
15 specking out is through certification process
16 and the producers annual review. But this
17 burden should not be borne alone by ACAs. ACAs
18 need the assistance and support of the program
19 which, for instance, could, as part of
20 periodic certifier training, give ACA better
21 tools to vet out the claims by handlers that
22 organic varieties do not meet their

1 requirements.

2 And in a few seconds, I just want
3 to comment that I support annotation change at
4 Sunset but they should only be introduced and
5 come before the Board after having made it
6 through committee and the public comment
7 process.

8 I refer people to Tim Dietz's
9 comments, written comments about the possible
10 consequences.

11 Flavors, you already heard my
12 comments. Yeast, an elegant solution. Bravo.
13 Colors. I support the annotation to exclude
14 those made with synthetic substance carriers
15 and relisting of mono and diglycerides. I
16 agree with the recommendation, NOSB Sunset
17 petition process should not be used to further
18 the interests of the single manufacturer or
19 interest group for that matter.

20 And for the record, anyone who
21 thinks that the NOSB has been using EPA or FDA
22 minimums as the bar for listing materials does

1 not know the history of this Board, which is
2 a very well documented matter of public
3 record. My advice is to go learn it, the rest
4 of the commentary.

5 Thanks.

6 MR. GIACOMINI: Thank you.

7 Comments or questions for Julie?

8 Julie, you will always be
9 recognized by the Chair. You just may not
10 always be allowed to speak. So, I think, you
11 know, as I'm getting ready to go off the Board
12 in my work I talk to -- as I'm so active in
13 the dairy industry. A lot of dairymen go out
14 of business and there is no one who finds
15 themselves more frustrated and less
16 influential in the process than a former
17 dairyman. They may have been the most active
18 political when they had a cow. But when they
19 don't have cows anymore, nobody will listen to
20 them. I don't think that is true with the
21 NOSB. I think the current Board and existing
22 Boards and I hope the future Boards always

1 give extreme respect to the inputs from former
2 Board members and the experiences they can
3 bring back to the table. So, thank you and
4 thank you to all of us.

5 Okay.

6 Amelia, Harriet and John.

7 Can you send me that document
8 please? You did? Okay. Great. Thank you.

9 MS. SLAYTON: Hello. My name is
10 Amelia Slayton. I'm the Managing Director of
11 Seven Bridges. We're an exclusively organic
12 hop broker. And we have been since 1997. And
13 I'm here to talk about the favorite subject of
14 the week. And I came prepared with a lot of
15 comments that don't seem relevant now that you
16 have decided to take hops off the list. And
17 that's really encouraging news for us. So,
18 some of my comments are more about concerns
19 about the implementation.

20 When I came to the meeting in the
21 spring, I was asked to work on some industry
22 statistics and so I do have some of those

1 figures and I know that the North American
2 Organic Hop Association already provided some
3 of these. Kind of reinforce that but I also
4 have figures for international hop supply.

5 So, my projections were for 2012
6 and by 2012 looking at the available supply to
7 U.S. brewers of certified organic hops, we're
8 looking at close to 200,000 pounds of
9 available hops, most of those coming from U.S.
10 growers but significantly 25,000 pounds from
11 Germany, 18,000 pounds from New Zealand,
12 10,000 pounds from Great Britain and Belgium.
13 Those countries are producing far more than
14 those numbers, but those are the numbers that
15 they're currently exporting to the U.S.

16 And working with figures from the
17 Organic Trade Association for U.S. organic
18 beer sales in 2009 which were 41 million, and
19 projecting a growth of 10 percent when the
20 average for the industry is 15 percent, so
21 just being conservative, we're looking at
22 sales around 55 million in 2012.

1 Using industry averages, that
2 translates to roughly 72,000 barrels of beer
3 or 72,000 pounds of hops. It is my hope that
4 with the change in organic standards and the
5 removal of hops from the list that the growth
6 curve will be exponential as more brewers
7 realize the potential for organic beer and
8 we'll see, you know, the supply and demand
9 equaling out over the next few years.

10 Speaking to my concern about
11 implementation, because it has always been the
12 requirement for brewers who want to use non-
13 organic hops to seek out organic supply first.
14 You know, over the past five years we've had
15 very few calls from brewers and even fewer
16 calls from certifiers checking facts.

17 And so, my concern is that this
18 will continue right up until the end and we're
19 sitting on, you know, hundreds of thousands of
20 pounds of hops in inventory that we need to
21 see before they expire and we'd like to see
22 that happen. So, I guess I have a question

1 for the Board if there's a plan for
2 implementation and enforcement of --

3 MR. GIACOMINI: Let's have her
4 complete. Is that your completion?

5 MS. SLAYTON: No, I had a few
6 other comments to make that I just want to --

7 MR. GIACOMINI: Yes, let's
8 complete your comments --

9 MS. SLAYTON: Okay.

10 MR. GIACOMINI: -- and then we'll
11 try and wrap up our answering your questions
12 and any other questions.

13 MS. SLAYTON: Okay. I'm just
14 going to be really brief on the rest of the
15 points since I know they've been made already.

16 Currently, we offer 30 varieties
17 of certified organic hops and so the variety
18 has increased significantly. Most of those
19 varieties we inventory small amounts of
20 because we just can't afford to have 5,000
21 pounds of 30 different varieties of hops. We
22 need communication from the industry to know

1 which hops they need or want and as we get
2 that communication we'll be able to inventory
3 the types of hops that they want. But the
4 varieties are already out there and growers
5 are willing to grow them.

6 One of the things that we've been
7 investing time and money in is export because
8 we've been so frustrated with the market here
9 in the U.S. and that's obviously going to
10 continue for a lot of good reasons. But, you
11 know, one of the concerns is that if we're
12 exporting all the organic hops, what U.S.
13 brewers going to use when they're required to
14 use them?

15 We've been doing a petition, a
16 consumer petition, for the past two years and
17 we've gathered over 1,000 signatures from
18 individuals and trades people who want hops
19 off the list and I will be delivering those.
20 We will be closing that petition now that the
21 goal or the date has been set.

22 MR. GIACOMINI: Thank you.

1 Questions/comments? Joe, do you
2 want to respond to that?

3 MR. SMILLIE: Yes. We're very
4 clear in our recommendation that we were
5 concerned by the commercial availability
6 function of 606. We mentioned it prominently
7 in our recommendation that there seemed to be,
8 we don't know, but there seemed to be a
9 disconnect between that requirement between
10 the certification organizations and the
11 brewers. We don't know that to be a fact and,
12 in fact, it could be there's been very
13 assiduous work on that. But there seemed to
14 be, because the hops growers and yourself have
15 said we've never been contacted -- so, we've
16 put that clearly in our recommendation to the
17 program that the implementation for hops in
18 January 1st, 2013, also bringing their
19 attention to the fact that the commercial
20 availability requirement and basically we send
21 that -- there's nothing more we can do. We
22 have a 2007 recommendation currently in the

1 hands of the program that talks about
2 commercial availability and the need for more
3 training and more guidelines on it. And they
4 have that. They now have our recommendation
5 for hops and I think the program will follow
6 through on the question of the commercial
7 availability.

8 MS. SLAYTON: I did have one more
9 question if I have time.

10 It's regarding the labeling of
11 organic beer and is there any plan to require
12 additional information on labels before 2013?

13 MR. GIACOMINI: I think we heard a
14 phone. All right. Own up.

15 I'm sorry, we didn't mean to
16 interrupt you, but that is a significant event
17 here.

18 MR. SMILLIE: You've been so good
19 so far.

20 MR. GIACOMINI: I have or
21 whatever.

22 MR. SMILLIE: That's a thing that

1 CCOF pointed out very clearly in their comment
2 is that, because of the current alcohol
3 labeling, there's not an ingredient panel
4 required. But I have it upstairs. I should
5 have brought it. But you can. In the
6 enrollments language and the title of beer you
7 can make it known that you're using organic
8 hops. It's just the labeling requirements per
9 se and I'm not even sure, Miles, they don't
10 allow for ingredient panel listing or you
11 don't have to do it?

12 MR. McEVOY: I believe they do
13 allow for organic or ingredient labeling on
14 beer but you don't have to do it. It's not
15 required. We don't have any plans to make
16 that change. We're waiting for your
17 recommendation on hops and then we'll move
18 forward with that.

19 MS. SLAYTON: I think the concern
20 is that the -- the consumer concern right now
21 about the distinction and consumers right now
22 can't make an informed choice when they look

1 at a label on beer and a lot of beer labels do
2 say barley, malt, hops. The list of
3 ingredients. It doesn't distinguish whether
4 the hops are organic or not. And usually it's
5 the brewers advertising that makes that
6 distinction if they are. But a lot of
7 breweries who aren't using organic hops really
8 want to gloss over that. And so the consumer
9 really has no way to know for sure.

10 MR. SMILLIE: I think the market
11 place will fix that. I think that the brewers
12 of organic beer will make it really clear that
13 they are using organic hops. And, again, as
14 of 2013, you won't be able to call the beer
15 organic at all if you don't use organic hops.
16 So, that will be resolved in 2013 and I think
17 the years leading up to 2013, I think the
18 marketing of the people who market organic
19 beers are going to be really clear about their
20 use of organic hops. So, I think we'll leave
21 that one to the market place to settle.

22 MR. GIACOMINI: Dave.

1 MR. DICKSON: Thank you for your
2 comments. I'm sorry I have my back to you
3 here.

4 First of all, what's the shelf
5 life of hops once they're harvested?

6 MS. SLAYTON: It is somewhat
7 varietal specific, anywhere from a year to
8 three years, depending on package and storage.
9 The value decreases significantly after the
10 first year.

11 MR. DICKSON: Okay. Secondly, are
12 you aware of brewers that are using nonorganic
13 hops in organic beer when you have hops
14 available for -- organic hops available?

15 MS. SLAYTON: Yes.

16 MR. DICKSON: And have you lodged
17 a complaint with the USDA?

18 MS. SLAYTON: I'm not aware that
19 you can when it's something permitted.

20 MR. DICKSON: You can do that and
21 I would highly recommend you do that. If
22 you're aware of any brewers that are using

1 nonorganic hops when you have some available,
2 lodge a complaint.

3 MS. SLAYTON: Thank you.

4 MR. GIACOMINI: Especially if it's
5 the same variety.

6 Okay. Any further -- okay.

7 Harriet -- we are up for a 9:15
8 break. Let's do Harriet and then we'll take
9 a break and we're already half an hour behind
10 schedule. So, go ahead, Harriet.

11 MS. BEHAR: Hello. I'm Harriet
12 Behar, the MOSES Organic Specialist and today
13 I have a variety of comments.

14 On the change to animal health in
15 the regulation, I believe clarification needs
16 to be made that the pain medication mentioned
17 in the recommendation are limited to only
18 those on the National List.

19 I support adding verifiable and
20 consistent animal welfare standards for all
21 species of livestock to be an LP reg, although
22 I have hesitancy with only outcome based

1 standards.

2 Many conventional cattle could
3 have high body scores. However, the process
4 and inputs by which these were achieved are
5 not compatible with organic agriculture. Both
6 the process, such as stocking rates as well as
7 the outcome, healthy animals must be part of
8 the organic animal welfare standards.

9 For nonruminant animals such as
10 poultry and swine, I would like to see the
11 recommendation include a minimum vegetative
12 cover to be maintained in the outdoor access
13 areas such as 50 percent. This honors the
14 mandate for soil and water conservation as
15 well as providing a healthy environment that
16 a bare lot would provide.

17 I'm going to tie animal welfare
18 and corn steep liquor together. The corn
19 steep liquor, this product is distinctly
20 different from the corn from which it was
21 made. There is more sulphur as a result of
22 the addition of the synthetic sulphur dioxide.

1 Again, it is not just the outcome but the
2 process and the inputs by which the outcome
3 was achieved that must be reviewed.

4 I strongly urge this Board to
5 postpone your decision on corn steep liquor
6 due to the lack of clarity of the organic
7 acceptability of the method, input and
8 outcome. What is at stake is too far-reaching
9 and should not be made without clear Board
10 agreement and broad consensus on this core
11 definition relating to chemical change.

12 This decision will set precedent
13 causing a chain reaction affecting many
14 materials currently approved or not approved
15 under the USDA organic seal. The Board's
16 fundamental responsibility is first to OFPA.
17 Legal consequences and market disruption have
18 been the result when statutory mandates were
19 not followed in the past.

20 I urge more investigation and
21 research before making what could be a
22 problematic decision.

1 For the Made with Organic label
2 recommendation. I do not believe we need to
3 provide greater visibility and, therefore,
4 higher stature to the Made with Organic label
5 than it currently has in the marketplace. This
6 is the label where manufacturers can go when
7 they choose to not use organic ingredients
8 that are commercially available, usually due
9 to price. This is not the case with all Made
10 with Organic products but it does happen.

11 If the concern is that consumers
12 do not view the Made With Organic label as
13 equivalent to organic or 100 percent organic,
14 well, they're saying it truthfully. It is not
15 equivalent. The 30 percent of the ingredients
16 of the Made with Organic product can contain
17 non-approved flowing agents, use non-approved
18 processing aids such nitrates and, of course,
19 have them produced with conventional
20 agricultural inputs.

21 The non-organic agricultural
22 ingredients in the Made With Organic category

1 does lower the organic integrity of the
2 product since it is a co-mingling of organic
3 with non-organic.

4 The non-organic ingredients are
5 produced with non-approved inputs from the
6 field through processing. This product is not
7 equivalent to organic or 100 percent organic
8 even though it goes through the inspection and
9 certification process.

10 If we want to increase organic
11 lands, we need to promote the organic label.
12 There are products in the marketplace using
13 the organic word incorrectly on their label.
14 I agree. But that can be dealt with as a
15 separate issue.

16 The argument that now technology
17 is a synthetic that organics should leave the
18 door open for future possible use is the same
19 door that the GMO community would like us to
20 give for their methods. Just as GMOs are
21 banned under the precautionary principle, so
22 should nanotechnology be banned.

1 And lastly, I just want to say to
2 remember that we are a process-based standard.
3 We are not a standard that tests the final
4 product to see if it is free of whatever we
5 don't like in it. We are process-based. So,
6 I ask you again to keep remembering to look at
7 the process, look at the inputs and then also
8 look at the outcome when you're reviewing
9 materials and methods.

10 Thank you.

11 MR. GIACOMINI: Questions?

12 MR. FELDMAN: Thanks, Harriet.

13 When you look at previous Board
14 decisions on this issue of synthetic, do you
15 concur with Jim Riddle on the previous
16 classification of chemical change, his example
17 being fish emulsions or extracts?

18 MS. BEHAR: Yes, I do. Yes, I
19 think that that was a very good analogy.

20 MR. FELDMAN: Yes. Okay. Thank
21 you.

22 MR. GIACOMINI: Wendy.

1 MS. FULWIDER: What is your
2 hesitancy on the outcome-based standards for
3 livestock?

4 MS. BEHAR: I believe that we
5 should be looking at the outcome. But we also
6 need to be looking at the method and the
7 inputs used to get that outcome. So, it's not
8 just only outcome. That's too narrowly based.
9 You're supposed to be looking as well. We're
10 a process-based standard which -- so, we have
11 to have a process to get to that outcome and
12 so that's what I'm saying. And it can be a
13 slippery slope like I said for body scoring.
14 A lot of conventional cattle operations can
15 have excellent cattle that score very high.
16 But the way they got to that score, those
17 things are not compatible with organic.

18 MR. GIACOMINI: Joe.

19 MR. SMILLIE: I used to sell fish
20 emulsion. In fact, I remember one time when
21 it exploded on me and I wasn't allowed in the
22 house for three days.

1 Fish emulsion is not a
2 fermentation product. Creation of fish
3 emulsion is definitely a chemical process. I
4 watched it being made. It's a chemical
5 process. There's no question about it. The
6 way we dealt with it is absolutely correct.
7 It's not a good analogy to corn wet milling.
8 Corn wet milling is a lactic acid fermentation
9 process. It's not designed to be a chemical
10 process, whereas, fish emulsion is a chemical
11 process. You're basically taking the acids,
12 pulling it off and we've allowed it because it
13 was a traditional method of nitrogen
14 fertilization in the organic industry and I
15 think it's a good allowance. It's one of
16 those synthetics that I think we need and we
17 want farmers to have and it is synthetic and
18 it is a chemical process. It's been correctly
19 handled in the past and I think it will stay
20 that way.

21 Our decision on CSL will not
22 affect the view of fish emulsion because it's

1 not a good analogy. Maybe we'll find a good
2 analogy sometime today. But that's not a good
3 one based on my understanding of both of those
4 processes.

5 MS. BEHAR: My response would be
6 that I just do not believe that there is
7 clarity yet on that. You've heard from public
8 comment that some people do feel it is
9 chemical change. And so, therefore, I really
10 think you should postpone this until you have
11 more broad consensus because this would have
12 far-reaching effects. And so until the Board
13 -- when you're going to get, you know, a 14 to
14 1 vote versus a 7 to 6 vote or whatever.

15 MR. SMILLIE: That's different. I
16 wanted to point the analogy is not a good
17 analogy.

18 MR. GIACOMINI: Jennifer.

19 JENNIFER: Thank you, Mr. Chair.
20 Thank you, Harriet, for your comments.

21 I kind of want to nip this growing
22 idea about the fact that I see either I or the

1 committee but certainly me as a representative
2 that I see Made with Organic as equivalent to
3 the other two categories because that is
4 clearly not the case. But I do think that
5 there are those cases where either
6 manufacturers or consumers do need to make
7 choices because of price and not everybody can
8 afford to be perfect but a lot of people
9 really do want to try to do better with their
10 diet. And we have this tool called the Made
11 With Organic label in our tool kit and I think
12 that we're potentially missing a huge
13 opportunity to satisfy the needs that exist
14 and just help consumers do better.

15 Thanks.

16 MR. GIACOMINI: Any further?

17 Okay. Before we wrap up, you made
18 a reference to qualifying the 238(c)(2)
19 document for only pain relief on the National
20 List.

21 A strict interpretation of right
22 now would be that even natural non-synthetic

1 pain relievers would not be allowed in the
2 absence of illness. And so we're trying to
3 make sure that those are reasonably to be
4 used. The other thing more directly to your
5 point is that again we deal with, we have this
6 recommendation but when it's enforced it's
7 enforced to the final rule. No synthetic pain
8 relief medication that's not on the National
9 List would ever be allowed. Okay. If it's
10 synthetic it would have to be on 603.

11 What we're trying to do here is
12 now that it's on 603 you need to be able to
13 use it to relieve pain in the cases where
14 you're using it in the absence of illness.
15 Where, again, in the strict interpretation of
16 what that language says, you could be
17 prevented from doing that and really harm
18 animal welfare.

19 MS. BEHAR: Well, I think the same
20 logic could be made that in the strict
21 interpretation we should be very clear for
22 preventative measures and pain medications

1 that things that are consistent with our
2 material inputs which would be natural or on
3 the National List.

4 MR. GIACOMINI: Okay. I think the
5 committee would feel that that's --

6 MS. BEHAR: Redundant.

7 MR. GIACOMINI: -- included. Yes,
8 maybe. Yes. Yes. Okay. Thanks.

9 MS. BEHAR: Redundancy doesn't
10 hurt.

11 MR. GIACOMINI: Okay.

12 Twenty five after. Fifteen-minute
13 break. Please be prompt.

14 Thank you.

15 (Whereupon, the above-entitled
16 matter went off the record from 9:27 a.m. to
17 9:42 a.m.)

18 MR. GIACOMINI: Okay. We have a
19 quorum of the Board. Hopefully, the speakers
20 we have -- on my stuff here is a flash drive.
21 Is this anyone's flash drive? Tracy is this
22 yours? Okay. Maybe Tina. I'm certainly not

1 going to put a strange flash drive into my
2 computer. No, but they hacked into CIA or
3 something. Somebody hacked into CIA doing
4 that once. They dropped flash drives in their
5 parking lot and people went into the -- oh,
6 what's in the flash drive? Got a virus in
7 their systems so they could hack in.

8 Okay. We have a missing flash
9 drive if anybody is looking for it.

10 Okay. First of all we're ready to
11 resume. Joan Smiley, Tony and Paul.

12 Before you get going though, Joan,
13 we've had some conversations among members of
14 the Board. Miles. It's always been the
15 policy of the Board not to allow derogatory
16 statements specifically related to a company
17 or an individual. I guess there could be
18 debate over how that company name was
19 addressed in that public comment, but the very
20 next person came up and said, okay. Well, now
21 I can make statements about Anheuser Busch,
22 about another company.

1 We would respectfully ask you to
2 review FACA and OGC and see what the ability
3 of this Board in that regard really is.

4 MR. McEVOY: Yes, certainly
5 support a very respectful dialogue and respect
6 of all the companies, all the people involved
7 in the business. So, we will take a look at
8 that and get back to you specifically about
9 that.

10 I would say that it is a public
11 comment session so people do have the right to
12 make public comments but they need to do so in
13 a respectful manner.

14 So, mentioning a company name, I
15 don't see how we could censor that. Certainly,
16 we have a very well-informed and educated
17 public here and I think they can discern
18 between what is a truthful statement and not.
19 You can certainly enter into the public record
20 things to put a different perspective into
21 what a comment is speaking.

22 MR. GIACOMINI: Okay.

1 MR. McEVOY: So, respect is
2 certainly very, very important, but I don't
3 see how we can censor someone mentioning a
4 company's name.

5 MR. GIACOMINI: Okay. But just so
6 everyone knows, we will I guess re- evaluate
7 the line but the Chair will not tolerate
8 disparaging, derogatory comments to companies
9 or individuals. Maybe the question there was
10 whether it was truly derogatory or factual.
11 But we'll just proceed from there.

12 So, any other announcements or
13 anything? We're ready to go so Joan Smiley.

14 MS. SMILEY: Yes. Well, my name
15 is Joan Smiley. I'm with Falcon Lab and
16 Falcon Lab is a developer of herbicides based
17 on naturally occurring sustainable resources.

18 Thank you for the opportunity. I'd
19 like to outline for the Board a petition for
20 ammonium nonanoate which is currently in
21 technical review.

22 To familiarize you with this

1 substance I will quote from June 2010 EPA
2 document. "Ammonium nonanoate is a naturally
3 occurring substance, has a non-toxic mode of
4 action and has a significant history of
5 exposure to humans and the environment.
6 Ammonium nonanoate is closely related to other
7 salts of fatty acids known as soap salts."

8 As a soap-based herbicide,
9 ammonium nonanoate is current NOP allowed for
10 organic use with restrictions to non-food
11 areas. But it is also EPA approved for food
12 use as a bio-herbicide. Ammonium nonanoate
13 has its own distinct singular substance CAS
14 number and it is the only ammonium soap that
15 both occurs in nature and has herbicidal
16 qualities.

17 The essence of the current
18 position is to add ammonium nonanoate as a
19 synthetic substance allowed for use as a
20 herbicide in organic food crop production as
21 follows: (1) One, prior to planting food
22 crop; (2) As a directed spray at the base of

1 grapevines and fruit trees; and (3) using
2 shielded hooded sprayers between food crop
3 rows.

4 I'd like to begin with some
5 supporting evidence for the need for another
6 organic herbicide. Here is a quote from the
7 USDA's own June 2009 economic information
8 bulletin titled "Emerging Issue in the U.S.
9 Organic Industry.

10 Despite the potential for organic
11 agriculture to improve the environmental
12 performance of U.S. agriculture, the national
13 standard is having only a modest impact on
14 environmental externalities caused by
15 conventional production methods because the
16 organic adoption rate is so low."

17 And another quote from the
18 Northwest Agricultural Research Foundation
19 from 2010. "Weed management in new wine grape
20 vineyards was identified as a primary
21 constraint to organic production in the region
22 at a meeting of the NARF alternative crops

1 grape advisory committee composed of
2 representatives from the area grape grower
3 groups.

4 USDA itself has been funding
5 research through IFR studies to identify
6 better, more cost effective organic herbicides
7 and on several occasions has included ammonium
8 nonanoate in their field tests. Each time
9 ammonium nonanoate performed substantially
10 better than other naturally occurring
11 substances and ammonium nonanoate is, at
12 minimum, a third the cost of other substances
13 and one-fourth the cost of almost all organic
14 herbicides.

15 In addition to cost and efficacy
16 issues, there are other challenges with
17 currently certified organic herbicides. For
18 example, clove oil and lemon grass oil are
19 only available from foreign sources and have
20 the potential risk of an unreliable less pure
21 supply.

22 Higher strength acetic acid at 20

1 percent which is needed to kill weeds is very
2 corrosive to human tissue, to metals,
3 including stainless steel and the use of such
4 would likely violate OSHA handling
5 requirements plus require the signal word
6 danger.

7 None of the herbicide substances
8 currently considered organic are a part of the
9 normal human diet. Ammonium nonanoate is.

10 Another compelling reason for an
11 efficacious cost-effective organic herbicide
12 aligns with the performance objective 1.3.1
13 stated on Monday morning at this very meeting.
14 Increase the number of organic production
15 operations by 25 percent by 2015."

16 As noted in the earlier quotes,
17 the high cost of weed control in organic crops
18 will almost certainly impede the progress of
19 this objective. As far as being natural
20 organic and sustainable as noted in detail in
21 the petition, ammonium nonanoate is constantly
22 forming in nature. It is only synthetic in

1 that it biodegrades within 24 hours so it
2 never accumulates and, therefore, is not
3 harvestable. It is produced identically to
4 how it forms in nature using FIFRA 25(b) raw
5 material, folic acid which is part of our
6 daily diet and oxygen from the air.

7 The EPA Red states that ammonium
8 nonanoate has low toxicity and that residues
9 from its pesticide use are not likely to
10 exceed the levels which are naturally
11 occurring and it would be indistinguishable to
12 know if the source was nature or intentional
13 spray.

14 Lastly, we would like to highlight
15 for the Board as we wonder how can some
16 substances be organic for some crop use and
17 non-organic for others? Insecticidal soaps
18 were renewed in April 2010 for use in organic
19 crop production with no restrictions. Ammonium
20 soap can be sprayed on crops as an animal
21 repellant. Soap-based herbicides were renewed
22 in April 2010 with restrictions but as stated

1 earlier, ammonium nonanoate is the only
2 ammonium soap that both occurs in nature and
3 has herbicidal quality.

4 Thank you.

5 MR. GIACOMINI: Thank you.

6 MS. ELLOR: Thank you for coming.

7 Just one comment.

8 Herbicides are not certified
9 organic. They're allowed for use in organic
10 agriculture. It's a very important line.

11 MS. SMILEY: Good point.

12 MR. SMILLIE: Where is this on the
13 crops work plan or --

14 MR. GIACOMINI: Its out for TR.

15 Questions? Thank you.

16 I'm working on getting an update
17 on my system so we're Tony, Paul and Jackie.

18 MR. DRYAK: Thank you for the
19 opportunity to present today and I'm here
20 presenting on behalf of my organic farm
21 located in Wisconsin as it relates to how
22 organic layers are handled.

1 When I began farming out of
2 college I viewed the opportunity to farm as an
3 opportunity and a privilege and a situation in
4 order to enable me to do something right that
5 was dictated by the growing season. There are
6 many jobs out here that give a person many
7 chances to get it right. But when you're on
8 the land and committed to do doing things
9 correctly on the land and you stay in one
10 place, whatever God's gift is for our life
11 dictates how many times we get to do it
12 correctly. The organic opportunity which we
13 began to participate in early '90s gave us and
14 afforded us that chance.

15 We have a multi-faceted organic
16 farm in west central Wisconsin. And have had
17 the chance to travel around the world to see
18 how other people do things. And we know that
19 the kind of standard that I believe this Board
20 would like to work toward in allowing chickens
21 to exhibit their natural behaviors, whether it
22 be within a laying house or outdoors is very

1 possible.

2 Earlier there was some exchange
3 between what the Europeans believe and what we
4 believe and I truly believe because I am in
5 those economies in another venture that I'm
6 part of, the U.S. organic standard really
7 tries to ascribe for one of the highest
8 standards out there.

9 It is true that, for example,
10 between the European standard as it relates to
11 layers that they do allow certain, what they
12 call exceptions to allow production to occur.

13 Here, as soon as we can settle on
14 a true standard that's meaningful and gives us
15 teeth to bite into the opportunity, we can
16 have the highest standard and still allow for
17 efficient egg production.

18 When we began producing organic
19 eggs we started out with an experiment of
20 2,000 layers. And the opportunity was brought
21 to us by Organic Valley and they had some
22 general guidelines. This is back in the mid-

1 '90s.

2 We took that as a challenge and
3 tried to find ways of making it work. At the
4 end of our production, we were in a house
5 situation with 8,000 birds that had true
6 outdoor access and not limited to two square
7 feet. We did not beak trim or DB whatsoever.
8 We had no cannibalism.

9 And what we learned as we explored
10 other opportunities around the world is that
11 the housing can work if you allow for flex
12 housing. So, given one's location in this
13 country you can create a living environment
14 for the bird so that as we have to deal with
15 very extreme winters, we still can have the
16 allowed space for the bird but still preserve
17 a lot of heat in the building.

18 The arguments that the industry
19 will have to go through change and that it
20 will be higher to produce an organic egg,
21 those are valid arguments. And as we move on
22 and explore the opportunities, we have to find

1 ways of making it work.

2 Lastly, I want to just emphasize
3 since I've talked about opportunity that the
4 organic poultry producer that produces eggs
5 for this market has a great chance to get this
6 thing right.

7 I have as an operation begun
8 experimenting with the use of heritage breeds
9 to see what their efficiencies are and that as
10 I stand here today can say that there may be
11 some solution there.

12 Thank you.

13 MR. GIACOMINI: Thank you.

14 Questions or comments?

15 Wait -- wait, sir. Questions.

16 Wendy.

17 MS. FULWIDER: What is your
18 experience then with the heritage breed?

19 MR. DRYAK: Using five heritage
20 breeds, I can give you more information. I
21 have the data, but out of the five we
22 selected, two looked to be promising Rhode

1 Island Red and Barred Rock.

2 The challenge with poultry
3 breeding because most organic layer operations
4 use what we call a GM type of chicken that's
5 highly genetically changed from the way it
6 used to be and it was all designed around
7 efficiency. And as a result we have aberrant
8 behaviors that are exhibited in birds.

9 But there's an opportunity there.
10 It's just that there has to be funding and
11 there has to be renewed research directed in
12 that in a meaningful way. Throughout Europe
13 they're doing it.

14 MR. GIACOMINI: Kevin.

15 MR. ENGELBERT: What are your
16 specific allowances for your birds for
17 outdoors? How many square feet and in the
18 barn?

19 MR. DRYAK: For 10,000 birds
20 allocation to 25 acres. I don't have it
21 computed to the exact square footage because
22 my -- I have visited egg-laying operations in

1 five countries in Europe and there they use
2 outdoor access in the truest sense of the word
3 where there are acres and acres devoted. And,
4 frankly, the birds use a lot of that space.

5 In my experiment this year, 100
6 percent of the birds go outside, if given the
7 opportunity. The larger the population
8 though, how they participate in the outside
9 varies on what other activities they need to
10 be up to whether it's scratching, creating a
11 nest, laying an egg and so forth.

12 So, the space requirements you're
13 suggesting here or at least I would view as
14 very minimum requirement. Now, the California
15 operations don't have to deal with the winter
16 that have here. So, again, the concept of
17 flex housing, and there are many examples that
18 can be found, that will enable this to work
19 and be commercially feasible.

20 I didn't answer your question of
21 square footage, but I'm allocating 25 acres
22 for 10,000 birds.

1 MR. GIACOMINI: Thank you. Further
2 questions/comments?

3 MR. MOYER: Yes. Thank you for
4 your comments.

5 Thinking about methionine in feed,
6 do you have any in your feed that you're
7 using? If so, how many pounds per ton?

8 MR. DRYAK: I'm buying a
9 commercially available organic layer feed. But
10 in the past and the last time I made comment
11 at NOSB which was in LaCrosse many years ago,
12 I had withdrawn all methionine from the feed
13 and I saw a direct impact of 10 to 15 percent
14 reduction in yield. As long as the market
15 understands that's a possibility, it's going
16 to lead to a higher cost egg.

17 When birds have access to
18 supplementing their feed in a truest sense,
19 they can augment that.

20 And one last comment around that.
21 I'm trying to create an operation that will
22 meet the EU standard organic. The EU standard

1 requires that chickens be fed silage. This
2 year we'll begin that experiment by through
3 the wintertime providing silage to them. It
4 is labor-intensive. But it also allows the
5 bird behavior to be maximally expressed in a
6 positive manner. You simply don't have the
7 issues of pecking in a manner that they go
8 crazy in a barn.

9 MR. GIACOMINI: Kevin.

10 MR. ENGELBERT: What type of
11 silage and did you see any health -- did you
12 have any health issues? You say you lost
13 production, but did you have any increased
14 health issues when you set the methionine?

15 MR. DRYAK: I didn't notice any
16 aberrant behavior. At that time, which was a
17 number of years ago, we weren't measuring
18 exactly how the outdoor interaction was
19 working. But to have a house full of 10,000
20 birds and to not have it beak trimmed, as an
21 example, how dangerous that was when I raised
22 this bunch of pullets and one of the Amish

1 testifiers here day before yesterday was one
2 of the people I was involved with. I told
3 them, don't beak trim the birds that you're
4 providing -- and I got them as 10-week old
5 birds. He said, well, what do you mean? I
6 said don't trim the beaks. He said well I do
7 it for everybody. I said, well, you're not
8 doing it for me.

9 We had a really excellent result
10 with that flock of birds. We didn't have
11 cannibalism and then I asked myself, well,
12 what am I doing differently than what the
13 industry claimed as an impossibility? And by
14 giving the bird the opportunity to express
15 itself in a natural manner really enhanced
16 that production.

17 Now, I used to be in the retail
18 trade in a small regional market and consumer
19 feedback was they tasted very good and they
20 like the color of the yolk. So, I guess
21 another way of concluding. When I finally
22 slaughtered that flock the USDA/FSIS inspector

1 came up to me and said, what did I do to the
2 birds? I said I allowed them to exhibit
3 natural behaviors. They didn't find any
4 significant parasite load and it was the
5 lowest condemnation rate they'd ever seen in
6 an organic flock.

7 So, that was testimony that it's
8 more than just luck.

9 MR. ENGELBERT: And what silage
10 did you feed and how much?

11 MR. DRYAK: I have put into silage
12 clover and grasses. Less stemming because it
13 has to be almost, you know, a clover petal
14 size, the bird will eat and swallow and
15 digest.

16 MR. GIACOMINI: Jennifer.

17 JENNIFER: Yes, back to the
18 methionine questions. And when you reduced
19 your methionine --

20 MR. DRYAK: I took it completely
21 out.

22 JENNIFER: Took it completely out.

1 Did you at that time have any heritage birds
2 or have you ever seen any studies of lower
3 methionine diets with heritage birds?

4 MR. DRYAK: I haven't seen any
5 studies. At that time I did not have a
6 heritage breed.

7 JENNIFER: Thank you.

8 MR. GIACOMINI: Jeff.

9 MR. MOYER: Quick follow to the
10 methionine question. You say you're using
11 commercial feed. How many pounds --

12 MR. DRYAK: I don't know the
13 inclusion rate.

14 MR. MOYER: Thank you.

15 MR. DRYAK: It's according to this
16 standard because they're inspected by MOSA.

17 MR. MOYER: Got you.

18 MR. GIACOMINI: Wendy.

19 MS. FULWIDER: Do you vary your
20 methionine levels by the feathering of the age
21 of the birds?

22 MR. DRYAK: I have not. I have

1 not. This year's experiment of the five
2 heritage breeds, we used a commercially
3 available feed. We noticed that feed
4 consumption was severely reduced because they
5 had outdoor access to basically white and red
6 clover.

7 MR. GIACOMINI: Any
8 comments/questions? Thank you.

9 Paul Frey, Jackie and Lisa.

10 MR. FREY: Good morning. My name
11 is Paul Frey and I'm with Frey Winery. We've
12 been making organic wine for about 30 years
13 without sulfites added.

14 So, this is a brief Power Point
15 presentation. We tried to condense it all
16 because what normally takes about an hour,
17 we're going to condense it down to five
18 minutes.

19 So, organic wine standards must be
20 upheld. The proposed sulfite amendment would
21 weaken organic standards.

22 Next slide please.

1 We can go through a brief history
2 of organic wine-making. This is sort of the
3 finest part.

4 Most of nearly 8,000 year history
5 of wine-making was from organic grapes with no
6 sulfites added. Organic no sulfite added
7 wine-making is nothing new. There's no solid
8 evidence sulfites were used in either
9 Egyptian, Greek or by the Romans. The Roman
10 writer Cato has said as Pliny said that live
11 oil with the fruitation which is boiled down for
12 each use for a pound and a half of salt from
13 time to time crushed marble, sulfur and resin.
14 He's not specified burning sulfur or to create
15 sulfite. This single passage is worth
16 something. The Romans used sulfites.

17 The real way to use it is
18 consequently unknown.

19 There were prohibitions against
20 sulfites in adulteration of wine in Europe and
21 the 14 countries and after.

22 Next slide please.

1 This is a so-called Roman natural
2 wine movement. Again, there's no proof they
3 added sulfite but they wanted pure stuff. For
4 that line which is most excellent which is
5 given pleasure by its own natural quality.
6 Beautiful. Nor should anything at all be
7 mixed with it by which its natural flavor
8 would be obscured.

9 We regard as the best line any
10 kind that can be kept without preservatives.
11 They did have resin and other things as a
12 preservative, but that is no longer the course
13 because of filtration.

14 Here we have the European natural
15 wine movement of the 1400s. 1472 Sturm-wine
16 having sulfites was prohibited in Frankfort,
17 Germany. 1495, sulfur in wine was prohibited
18 in Freyburg and Lindau, Germany. From the
19 extract of the law 1497. Wine shall be kept
20 in its natural form and not be destroyed by
21 noxious, detrimental additions.

22 The decrease of 1487 and 1497

1 declared that to sell wine that contained
2 added sulfites as a wine that was made without
3 added sulfites. This is 500 years ago. They
4 had rules, they had to specify.

5 Wines had to be declared that they
6 contained sulfite or did not. So, the
7 purchaser knew what they were buying. The
8 same as today.

9 Prohibitions against adulteration
10 of sulfites were established to protect
11 regional wine reputations that were being
12 damaged by adding excessive sulfites and to
13 protect the consumer because they have related
14 consequences.

15 Another prohibition of changing
16 the natural character of wine was raised by
17 King Albert II.

18 Next slide.

19 Some say that sulfite use was
20 extensive over the last 500 years. That isn't
21 quite the case. Here's a quote by Jules
22 Guyot, famous French wine viticulturist. There

1 was actually an institute named after him in
2 France. He's the inventor of the Guyot
3 Trellis. Anybody who has studied wine-making,
4 the Guyot Trellis and vineyard management.

5 He says, wines well made are never
6 unsound. With regards to sulfur in the cask
7 which is where they added the sulfite by
8 bringing the solution into the wine, I cannot
9 recommend it for it kills the wine and give it
10 a bad taste.

11 So, here you have one of the
12 premier wine people over 100 years ago in
13 France saying it's basically not necessary.
14 There is one more under that.

15 Another guy, Jules Chauvet who is
16 really the father of the no sulfite movement
17 in modern France in 1960. "Sulfite in wine is
18 not indispensable. The idea would be not to
19 sulfur."

20 Next slide please.

21 Sulfites are unnecessary in
22 advanced organic wine-making. Micron

1 filtration solved the microbial problems.
2 Zurosh in bottling which is standard now and
3 understanding the wines micro chemistry solved
4 the oxidation issues.

5 Other recent advances in wine-
6 making equipment and understanding wine
7 chemistry make the use of sulfites
8 unnecessary.

9 Next slide please.

10 This is since we've run metals,
11 gold, silver and so on and these wines compete
12 with any wines on the market.

13 Next please.

14 The proposal to allow 100 percent
15 of the allergen sulfite into USDA organic wine
16 would be dangerous and damaging. The proposal
17 would allow up to 100 times the amount of
18 sulfite that occur in wine naturally. A
19 hundred times. Most organic red wine has euro
20 parts per million sulfite. Organic whites
21 have about five parts per million.

22 The proposal would allow up to ten

1 times above the U.S. and the EU governments
2 consider as safe. All wine must have a
3 contained sulfite warning label if they
4 contain about 10 parts per million. The
5 proposal would mislead consumers who today
6 know that USDA organic wine has never had any
7 added sulfites.

8 The World Health Organization
9 recognized that four percent of the adult
10 asthmatic population is dangerous for them.

11 Next slide please.

12 MR. GIACOMINI: Okay. Can you
13 wrap it up please. That's your five minutes
14 and a summary as quick as possible.

15 MR. FREY: Yes. World Health
16 Organization says it's an allergen.

17 Next for the conclusion.

18 The European Commission rejects
19 proposal on sulfite organic wine. I'm not
20 really compromising organics generally because
21 it sends the wrong signal to consumers on the
22 quality policy. Organic wine has to be true

1 organic wine.

2 Conclusion please. Just go to the
3 next slide.

4 Synthetic sulfite is a known
5 allergen that is not allowed in organic foods
6 and has never been allowed in USDA-certified
7 organic wine. Recent events as wine-making,
8 one the methods used to historically prove
9 that sulfites are not essential. Consumers
10 know that USDA certified organic wines have
11 never had the synthetic allergic preservative
12 sulfite added which can cause human harm.

13 MR. GIACOMINI: Thank you.

14 MR. FREY: Thank you.

15 MR. GIACOMINI: Questions/comments?

16 Jay.

17 MR. FELDMAN: Thanks, Paul.

18 We're being asked to review the
19 Made With label. How do you feel about that
20 label and its impact in the market and
21 protection of consumers?

22 MR. FREY: It would be a --

1 MR. GIACOMINI: If you would stand
2 at the podium it would be on the record.

3 MR. FREY: Yes, okay. To allow a
4 synthetic allergic preservative into that
5 category is -- the question is?

6 MR. FELDMAN: In terms of the Made
7 With label, which is current practice.

8 MR. FREY: Yes. That's true in
9 practice. That's true to labeling that
10 there's no problem with that.

11 MR. FELDMAN: Okay. Why do you
12 think more wineries -- I mean, you list eight
13 or nine here that are producing wine without
14 sulfites.

15 MR. FREY: Yes, there's more than
16 that. That's just a few of them.

17 MR. FELDMAN: Why do -- can you
18 explain to us why the market has not gone more
19 toward the, you know, organic labels as
20 opposed to the Made With? What's holding back
21 the other wineries from moving to the organic
22 label?

1 MR. FREY: Most of the wine makers
2 are educated at universities where they
3 basically say you cannot make wine without
4 sulfites, even though there's an 8,000 --
5 actually 10,000 year history, evidence of
6 wine-making in China 9,400 years ago. Even
7 though most of the history is made without
8 sulfites and most of those people have never
9 made wine without sulfites.

10 MR. FELDMAN: So, do you believe
11 that use of sulfites in organic wine is
12 unnecessary?

13 MR. FREY: You don't need sulfites
14 in any wine-making including organic wine.

15 MR. FELDMAN: Okay. Thank you.

16 MR. GIACOMINI: Okay. The Chair
17 is going to please ask the public to be as
18 responsive as possible to the buzzer. We've
19 had a number of people already this morning
20 that have gone on and on a bit. We're going
21 to try to be more responsive to the buzzer
22 without the Chair needed to resort to be

1 appearing rude.

2 So, thank you.

3 MR. FREY: Thanks a lot.

4 MR. GIACOMINI: Thank you.

5 Yes, if you can just stay at the
6 podium with the microphone there, I think it
7 will come up better on the record.

8 Next up Jackie, Lisa and Shannon.

9 MS. VonRUDEN: My name is Jackie
10 Von Ruden. I'm the Farm Certification Manager
11 for MOSA. I'm speaking for Holly Born who is
12 unable to be here today. She is also a
13 Certification Specialist and Staff Inspector
14 for MOSA.

15 I would like to comment on the
16 handling and slaughter discussion document.
17 First, from the processor's prospective and
18 second from the certifier prospective.

19 I recently surveyed all the meat
20 and poultry processors that are currently
21 certified by MOSA for their reaction to
22 proposal parameters. Meat processors did not

1 express any concern. I'd like to note some
2 concerns that two MOSA-certified poultry
3 processors have expressed regarding the
4 proposed guideline.

5 Both of these processors are small
6 scale and like most small scale poultry
7 processors, do not stun the birds before
8 placing them in a scalding, but they put them
9 in cones and cut the jugular vein to kill the
10 bird before it goes into the scalding.

11 One processor in Illinois says he
12 feels that the proposed guidelines would add
13 excessive time and cost to his operation.

14 Additionally, this operation is
15 operated under the Amish church rules as much
16 as possible so any camera systems would not be
17 allowed.

18 A Wisconsin processor says that in
19 his opinion, stunning does not produce any
20 adequate bleed out of the birds and that this
21 has a negative effect on meat quality. He is
22 also not convinced that stunning is really

1 more humane. He thinks that the proposed
2 guidelines as biased towards larger processors
3 and points out that in small scale operations
4 like his he can give more time and care in
5 handling the birds properly and observing that
6 they are indeed dead before they enter the
7 scalding.

8 However, he is open to adopting
9 these guidelines but needs more research-based
10 data to show that stunning is superior in
11 terms of meat quality and animal welfare and
12 access to training to learn how to stun
13 properly.

14 Next, I'd like to comment on the
15 proposed guidelines from MOSA's point of view.

16 Although MOSA supports the intent
17 of the guidelines, however, we have a lot of
18 questions regarding how as organic inspectors
19 and certifiers we will need to verify that
20 these parameters are being met.

21 The discussion implies that
22 organic handler inspections will need to take

1 place on slaughter days at processing plants
2 which are certified processors have told us is
3 really difficult to manage. Additionally,
4 most inspectors will need training on how to
5 effectively verify that the stunning has been
6 effective.

7 We also wonder how scoring methods
8 described in the document would be
9 implemented. Will inspectors need to observe
10 100 animals being stunned? This could really
11 increase inspection time and thus cost.

12 For a small-scale plant how would
13 the score be aggregated over time? Would more
14 than one inspection be needed to achieve the
15 100 animal score?

16 The discussion also implies that
17 organic inspections of crop producers would
18 need to take place on days when animals are
19 being handled for transport to the plant so
20 that handling and condition of transport can
21 be observed. How would this translate into
22 real life? For example, would an inspector

1 need to verify the poultry were caught after
2 they had settled in for the night and then
3 return the next morning to further observe the
4 handling and processing?

5 Further clarification will also be
6 needed. For example, the discussion document
7 notes that Halal and Kosher slaughter method
8 with some conditions would be allowed for
9 mammals but does not say whether these methods
10 are allowed for poultry. Thought discussion
11 yesterday did clarify that both methods would
12 also be acceptable for poultry, we request
13 that this be clarified in the document.

14 In summary, it appears that these
15 guidelines, if implemented, would increase
16 animal welfare and could be quite acceptable
17 to both processors and certifiers. But a more
18 defined inspection and certification protocol
19 procedure would need to be -- would be needed
20 for certifiers to be able to truly verify that
21 they're being met.

22 MR. GIACOMINI: Comments/

1 questions?

2 MS. VonRUDEN: Thank you.

3 MR. GIACOMINI: Thank you.

4 Lisa, Shannon and Bea James.

5 MS. McCrORY: Hi. My name is Lisa
6 McCrory and I work for the Northeast Organic
7 Dairy Producers Alliance. And I'm going to be
8 making some points on the animal welfare
9 discussion document and if time permits,
10 origin of livestock.

11 NODPA is an organic dairy farmer
12 organization with a membership of 836 organic
13 dairy farmers. NODPA's mission is to enable
14 organic dairy family farmers situated across
15 an extensive area who have informed discussion
16 about matters critical to the well being of
17 the organic dairy industry as a whole.

18 We want to first take this time to
19 thank Kevin Engelbert for his excellent work
20 and dedicated service as a member of the NOSB.
21 We also want to recognize that it takes a
22 family to support a farmer as NOSB member and

1 Kevin's wife and children have worked along
2 side to make it possible for him to donate his
3 time and knowledge to his NOSB work on behalf
4 of organic agriculture.

5 We hope he continues to share his
6 knowledge with the Board in the future and
7 wish he and his family every success in the
8 future.

9 And we also want to make note that
10 the financial sacrifices if Kevin and his
11 family while serving on the Board highlights
12 the need to provide stipends to NOSB members
13 who are either full-time farmers or self-
14 employed industry professionals. The lack of
15 a stipend has prevented many good farmers from
16 earning their living from farming from
17 volunteering their time to serve on the Board.
18 For a dairy farmer this would include the cost
19 of a relief milker, extra help to complete
20 field work and an acknowledgement that when a
21 farmer leaves their farm in the control of
22 someone else, there are inevitable losses of

1 income if only through a loss of milk
2 production.

3 We urge the USDA and NOP to
4 address this issue to insure that we have a
5 balanced membership on the Board that truly
6 reflects the unique mix of organic
7 agriculture.

8 And NODPA welcomes the recent work
9 of the NOP to provide guidance and more
10 clarity on how inspectors and certifiers
11 interpret different regulations. The most
12 recent recommendation by the NOSB Livestock
13 Committee assumed a certain level of knowledge
14 and understanding of livestock behavior during
15 the annual inspection by inspectors on behalf
16 of certifiers.

17 While we applaud the large number
18 of highly qualified inspectors that do a
19 tremendous job with their interpretation of
20 the health and welfare of livestock, we also
21 have reports that some inspectors prefer to
22 work only from a checklist and have little

1 experience and knowledge of livestock.

2 We hope that the NOP as a creditor
3 of the program will increase their oversight
4 when it comes to the qualifications of
5 inspectors and the training that they received
6 from certifiers.

7 And in relation to 205.239,
8 livestock living conditions, the mammalian
9 section. Regarding the invitation for public
10 input on stock rate charts. We strongly
11 believe that the organic animal welfare
12 guidance and standards must be sensible and
13 based on reasonable standards that are
14 determined by the realities of farming, good
15 husbandry, grazing, natural animal behavior
16 and natural healing.

17 We do not support any space
18 requirements within the regulations for dairy
19 animals. Rather, an education of inspectors
20 to insure proper standards are achieved based
21 on guidance from the NOP.

22 We recognize the importance of

1 requiring adequate space for animals to
2 exhibit their natural behavior during the non-
3 grazing season or during times of temporary
4 confinement. Dairy animals are managed in a
5 variety of different geographic locations and
6 under many different constraints to preserve
7 soil and water quality. Inspectors need to be
8 trained to recognize conditions that are
9 adverse to the animals exhibiting their
10 natural behavior during the times they are
11 temporarily confined.

12 An animal confined for breeding
13 will have a different requirement to one
14 confined for tabbing or one confined during
15 the winter storms. And animals confined in
16 northern Maine will need different housing
17 than one confined in southern California.
18 Detailing minimum average standards would
19 cause some operations to work to those
20 standards which may be inappropriate to their
21 location and facility.

22 The Livestock Committee's

1 recommendations contain the table with a
2 minimum square footage for each animal
3 dependent on their size. There's no guidance
4 as to how that area is measured and we have
5 the following questions which have been raised
6 by our members.

7 Thank you.

8 One, what is included in this
9 space in a free stall barn?

10 Does it include the feeding alley
11 ways or just the stall area?

12 In a tie-stall barn does it
13 include the lunging area that a cow uses to
14 stand which could also be the feeding area?

15 If you have a mixed herd with
16 variable sizes, do you need variable sizes of
17 stalls or is the total designated area for
18 bedding space divided by the weight of the
19 total number of animals using the space to
20 find the average bedded space needed?

21 Does the inspector need to come in
22 with a tape measure or will they be required

1 to have the building dimensions and take an
2 average for the whole herd?

3 So, we recommend that the
4 inspectors use a score card of the general
5 health of the individual cow as a percentage
6 of the whole herd which allows for many
7 different criteria to be used including
8 breeding, time of lactation, age, time of
9 year. That way if a producer is excelling in
10 most areas but weak in others they would not
11 be penalized.

12 Thank you.

13 MR. GIACOMINI: Thank you.

14 Questions? Kevin.

15 MR. ENGELBERT: First, thank you
16 very much for those comments we're getting
17 from the farmers. I'm very appreciative.

18 And as far as the stipend, I'd be
19 very careful to go down that road. I'd hate
20 to see that influence whether or not some was
21 put on the Board and I'd hate to see that any
22 type of resentment develop from other Board

1 members that didn't receive the stipend. I
2 would think if it was considered it would be
3 either all of none for Board members for any
4 type of stipend.

5 And, yes, we have lost income by
6 me being on the Board and as I said Monday, no
7 one is going to be happier when I graduate
8 than my sons. But I knew that coming in and
9 I have a unique situation that they finally
10 came of age where I was comfortable doing this
11 and that's why I decided to run for the Board.
12 So, it could be a very touchy situation, but
13 I appreciate the sentiment.

14 MS. McCORRY: I just want to say
15 that I recognize that and there's lots of
16 wonderful producers of many areas within the
17 organic sector that I think would also play a
18 critical role and probably they can't be
19 involved on the level that you've performed
20 because of their constraints. And I agree
21 that if there is a stipend that it should be
22 universal.

1 But if we want to have good
2 representation from the whole organic
3 community, I think we're missing out on
4 certain key contributors.

5 MR. GIACOMINI: Other comments or
6 questions?

7 All right. Thank you.

8 MS. McCORRY: Thank you.

9 MR. GIACOMINI: Shannon, Bea James
10 and Phil LaRocca.

11 MS. SZYMKOWIAK: Hello. My name
12 is Shannon Szymkowiak. I may have Jim beat
13 with the last name there.

14 I'm the Promotions and Education
15 Manager at Whole Foods Co-Op in Duluth,
16 Minnesota, current receiving five inches of
17 snow.

18 Although I don't do inspections I
19 am an IOI trained inspector and a novice bee
20 keeper.

21 I grew up in the State of
22 Minnesota and I'm the granddaughter of two

1 sets of dairy farmers. And spent a lot of
2 time out on the farm to keep me out of
3 trouble. They were traditional farmers and
4 they focused mainly on dairy, pork and egg
5 production. And they also grew alfalfa and
6 field rotation as their primary methods of
7 completing that cycle.

8 Their care of the land and animals
9 illustrated the spirit of sustainability and
10 good animal husbandry. They wouldn't consider
11 keeping animals in a barn that wasn't
12 regularly cleaned and they wouldn't let their
13 animals suffer by way of heat, cold or
14 crowding. It was just the way it was done. If
15 an animal was going to give you something,
16 milk, eggs, meat, whatever, it's your duty to
17 care for that animal in a way that you'd be
18 cared for if someone was in charge of feeding
19 and caring for you.

20 Respectfully, panel, this is your
21 job. When I purchase organic food you are in
22 a way in charge of feeding me. The decisions

1 you make gave a direct and profound effect not
2 only on the life quality of the animals in our
3 care but the effect on my quality of life and
4 the quality of life of everyone who puts their
5 trust on the label reading USDA Organic.

6 When I first began working in the
7 natural foods industry about 17 years ago, it
8 was right before the very first organic
9 standards were released. When the initial
10 rule was presented for comment which allows
11 GMOs, the Radiation Commission of Sewage
12 Slage's field input, I began to pay attention.
13 I stopped being the deli worker who was in
14 charge of the cheese crew every Wednesday and
15 became an agent of change.

16 Many people including myself spoke
17 up about this and it made a difference and we
18 appreciate that. Thank you very much.

19 I now work for a natural foods co-
20 op in Duluth that is a certified organic
21 retailer in every department of our store. I
22 train our staff on the basics of the rule and

1 I do outreach in the community about natural
2 and organic food and I'm asked at nearly
3 everyone of my 50 to 75 presentations a year.
4 Is paying for organic food worth it? Is there
5 really a difference? And I would argue that
6 if we don't take a stand I'll soon have to say
7 no.

8 The situation regarding chicken
9 and egg production in organics must be
10 addressed both from a food safety and animal
11 husbandry standpoint. We cannot allow the
12 organic label to become pointless.

13 Organic products do get a premium
14 price in the marketplace and when you're
15 buying from a small to medium farmer who is
16 not gaining subsidies, who uses manual labor
17 and documenting, this premium is a small price
18 to pay to insure good quality for the life of
19 the farmer as well as the animals in his or
20 her care. However, when as a customer I see
21 chicken houses that hold thousands of animals
22 who have little to no access to the out of

1 doors, I start to lose confidence in that
2 label.

3 The argument has been brought up
4 that it is impossible to be profitable unless
5 an operation is a large one. But many farmers
6 out there would prove the larger companies
7 wrong. Someone earlier was speaking about
8 Larry Schultz and I've known Larry Schultz for
9 years. I bought eggs from him when I was a
10 dairy buyer at Line Hille Co-Op in the '90s
11 and we purchased his eggs and meat products
12 now at a foods co-op where I work currently.

13 He's a successful example of how
14 you can do the right thing and still raise
15 your family. He got the 5 egg rating and I
16 wouldn't doubt it for a second. He really
17 does a good job.

18 I ask you today to put firm, clear
19 language into the NOP regarding animal
20 housing, clean water, access to the out of
21 door for all of the animals and enforcement of
22 this rule is imperative to the assurance in

1 the organic label.

2 I also ask you to disallow organic
3 labeling by companies who do not abide by this
4 clear language. Equal footing for all
5 producers is vital to customer confidence and
6 the survival of the smaller farmer.

7 I do not believe that if a farmer
8 is large they shouldn't be allowed organic as
9 long as those companies play by the same
10 rules. Organic is supposed to be another way.
11 Shoppers make choices sometimes sacrificing
12 other things in their households to buy
13 organically certified food. This label should
14 mean more than another value added product to
15 large producers who have no interest in
16 following the spirit of the law and barely
17 skirt the letter of it.

18 I'm thankful for the opportunity
19 to speak out about this issue and I hope the
20 interest of the independent organic farmer,
21 the consumer and the animals are considered
22 implemented in enforcement of the national

1 organic program.

2 Thank you.

3 MR. GIACOMINI: Thank you.

4 Questions/comments.

5 Jay.

6 MR. FELDMAN: Thanks for being an
7 agent of change. We need that.

8 I'm curious because you intersect
9 with consumers about some of your thoughts on
10 integrity issues. And have you been listening
11 to the debate on synthetic/non-synthetic?

12 MS. SZYMKOWIAK: I just caught it
13 this morning. I just came in today for this
14 one.

15 MR. FELDMAN: Maybe I'll ask you a
16 more general question then.

17 I find on my experience with the
18 Board so far that we face sometimes questions
19 that lack clarity in terms of their answers.
20 Especially on issues -- this issue of
21 synthetic/non-synthetic. And I'm wondering
22 from a consumer prospectus, where do you think

1 the precautionary principle on issues like
2 that fit? In other words, where do you think
3 we should air as a Board when we are face with
4 decisions for which there is disagreement on
5 basic issues -- that some would define as
6 issues of integrity -- organic integrity? Do
7 you get a sense from consumers that they would
8 prefer we air on the side of caution or that
9 we just wing it?

10 MS. SZYMKOWIAK: The sense that I
11 get is airing on the side of caution because
12 I do get questions not only about our own
13 ruling on our own organic standards, but I
14 also get questions because we're in northern
15 Minnesota we do get a lot of produce from
16 Mexico, California about the integrity of
17 those products and are they being inspected to
18 the same standards that a farmer in Wisconsin
19 is. There's a lot of skepticism out there.
20 And I run into that just about every
21 presentation I give.

22 MR. FELDMAN: Thank you.

1 Thank you, Mr. Chair. I just want
2 to correct my comments. I don't want to
3 mischaracterize. I know a lot of work has
4 gone into this on the Board of this issue of
5 synthetic/non-synthetic. But I'm trying to
6 grapple with this issue of disagreement,
7 honest disagreement on how we define things
8 without denigrating the important work that's
9 gone on by this Board to try to create clarity
10 around these issues.

11 Thank you.

12 MS. SZYMKOWIAK: If I may?

13 Sometimes you'll see an ingredient
14 label where non-organic producers will list
15 their sourcing, you know, behind the
16 ingredient so that the customer -- the
17 consumer is knowing what it is and that is
18 something that I point out when I'm talking
19 about label reading to groups that I speak to
20 and that may be a possible solution.

21 MR. GIACOMINI: Yes, the -- yes,
22 thank you.

1 Are there any other questions?

2 Yes, thank you.

3 The presentation of an action of
4 this Board as winging it if I heard you
5 correctly is a bit of a misrepresentation with
6 the amount of work we do on it.

7 MR. FELDMAN: That's why I offered
8 the correction, Mr. Chair.

9 MR. GIACOMINI: Yes.

10 MR. FELDMAN: I believe that there
11 is sincerity on all sides of this issue.

12 MR. GIACOMINI: Thank you.

13 Okay. Bea James, Phil LaRocca and
14 George Bass.

15 MS. JAMES: Okay. This is going
16 to be fast forward so hold on.

17 For the record, my name is Bea
18 James. Good morning, Mr. Chairman, esteemed
19 NOSB Board Members and NOP.

20 I'm here today before you as a
21 retail representative from Lunds Food
22 Holdings, a small family owned 21 store retail

1 chain in Minneapolis with certified organic
2 produce departments, a certified organic
3 distribution center and over 11,000 organic
4 and natural products throughout the store.

5 Regarding Made With Organic. The
6 general direction of the recommendation is
7 correct because the majority of consumers are
8 still at an entry level with understanding
9 organic products. Organic food is still a
10 small percent of the total retail sales in the
11 market and your mainstream consumer needs
12 clear direction on the front of the package to
13 help grow the organic industry.

14 Somehow we need to do a better job
15 of explaining the organic content to our
16 consumer on products that fall below 95
17 percent. That's 95. But to add certified to
18 USDA guidelines mocks the USDA seal and adds
19 more confusion to an already puzzling organic
20 packaging.

21 My suggestion is to clearly tell
22 the consumers what they're getting. The NOP

1 might want to consider requiring manufacturers
2 that fall below 95 percent organic ingredients
3 to put the percent of the organic ingredient
4 in the USDA seals. Yes, I did say in the USDA
5 seal. Just say it like it is and add the
6 percent of the organic ingredients right in
7 the USDA seal. Yes, bold. Yes, possibly a
8 nightmare for certifiers and manufacturers,
9 but consumer would love it. And this would
10 eliminate any consumer confusion and cut down
11 on my training and education time in the
12 store.

13 Exhibit A for your consideration.

14 Animal welfare discussion.

15 Consumer expect animal welfare
16 from organic production and the pictures on
17 organic packaging has led them to believe that
18 we are taking good care of our smiling,
19 dancing, happy cows and chickens. Please
20 carefully consider the use of the word
21 "access". Access does not mandate animals to
22 be outside and as we learned from the pasture

1 rule you need to look carefully at where you
2 should be prescriptive to restrict loopholes.

3 I ask these questions for the
4 Livestock Committee.

5 1. Do animals go outside just
6 because there's a small door for access or is
7 this a learned behavior that must be
8 encouraged by the farmer?

9 2. Should inspectors just look
10 for access to outdoors to be in compliance or
11 should they also be inspecting from our
12 concrete evidence that animals are accessing
13 the outdoors for a healthy amount of time?
14 Animal welfare is so important that I thank
15 the Livestock Committee for bringing it to the
16 forefront.

17 Nutrient vitamin and mineral
18 discussion document. Fortification is a
19 byproduct of over-processing. Industrial
20 processing often removes nutrients to get to
21 a final product that generally is developed
22 for longer shelf life and to mask the hardy

1 fibrous and favorable quality that comes from
2 unaltered whole foods. However, if the
3 organic industry is going to have highly
4 processed organic versions of junk food then
5 we should fortify it.

6 There's a nutrition value program
7 for retailers called New Val. Retailers like
8 Wegman's, Coburn's and HI-V and many more are
9 using it. In a nutshell, the program tells
10 consumers what to eat based on a number that
11 is shown on the shelf tag.

12 The algorithm considers nutrient
13 sin the numerator and trans fat, sodium and
14 sugar and such the denominator to determine a
15 score. A high score is good and means lots of
16 nutrients and a low score is bad and means
17 poor nutrients. Added nutrients go a long way
18 in the New Val program. And so it is
19 troubling to see Strawberry Captain Crunch
20 score higher than Peace Cereal or Alvarado
21 Street Sprouted Wheat Bread score lower than
22 Wonder Bread.

1 Now, Exhibit B for your
2 consideration, information on the New Val
3 Program.

4 Personal care. Last year the NOSB
5 directed the NOP to solve the problem of
6 mislabeled organic personal care. While the
7 NOP has been slow to act, whole foods market
8 is leading the way. In June of this year
9 Whole Foods became the first retail chain to
10 adopt an organic integrity policy for health
11 and beauty care products sold in their store.
12 Congratulations to Whole Foods for setting the
13 bar for our industry and to the many co-ops
14 who have also adopted Whole Foods' lead. We
15 at Lund's believe in this direction and will
16 be following suit in holding not only the
17 natural organic body care industry to the same
18 standards but the conventional body are
19 industry as well.

20 Many of these conventional
21 cosmetic companies misuse the word "organic".
22 Although the USDA has no authority over

1 production and labeling of non-agricultural
2 body care products, they should have authority
3 over the use of the term "organic" on these
4 products.

5 205.300 needs stronger language
6 regarding the use of the term "organic" as a
7 marketing or branding term. I respectfully
8 ask the NOP to consider this in their response
9 to the NOSB personal care recommendation to
10 reduce this type of mislabeling in my
11 exempling.

12 In my examples, Exhibit C for your
13 consideration and for your grooming pleasure
14 if you're brave enough to use those
15 conventional products.

16 And last, congratulations Kevin,
17 Dan, Jennifer, Jeff and Joe for your five
18 years of service. Enjoy your soon to be open
19 slots in Outlook. I know your family, friends
20 and pets will enjoy seeing you again.

21 I have a huge box of chocolate as
22 a way to show appreciation and respectfully

1 submit them as Exhibit D and there is plenty
2 for everybody.

3 Thank you.

4 MR. GIACOMINI: Thank you.

5 Comments or questions for Bea?

6 Kevin.

7 MR. ENGELBERT: I was very
8 interested in your comments about fortifying
9 food. Even if you had all the vitamins and
10 nutrients that were certified organic you
11 couldn't live on them alone. You've got to
12 have wholesome food.

13 How do we go down the road of
14 allowing organic food to be fortified because
15 of all the processing that's done and yet
16 still make the distinction between that food
17 on the shelf and the one that is local, hasn't
18 been processed and get consumers to pay
19 assuming the extra cost and what is, I would
20 consider to be, a true organic food as opposed
21 to one that's been fortified?

22 MS. JAMES: Well, I agree with you

1 wholeheartedly, Kevin, and I think that's a
2 question that should have been posed when we
3 decided -- the organic industry decided to get
4 into processed food.

5 If we're going to have processed
6 food a lot of the nutrients are taken out of
7 processed food and you've got conventional
8 like products that are being fortified with
9 synthetics. And to Joe's point, you know, and
10 I know it might shock him to hear me say this
11 that some synthetics are not all bad. And
12 when you've looking at the nutrition of a
13 product and if you need to fortify it to re-
14 enter the nutritional value that was lost
15 during processing, then I just ask the Board
16 to respectfully consider that.

17 MR. GIACOMINI: Joe.

18 MR. SMILLIE: Right. On the Made
19 With label, you recommend the direction of our
20 recommendation but not the details of it. So,
21 in other words, you also believe that this
22 label claim needs some support? You just

1 didn't like the way we proposed the support by
2 adding the word?

3 MS. JAMES: Yes. I think it's
4 confusing.

5 For instance, if on the shelf you
6 have a product with the USDA organic seal, and
7 then you have a product right next to it that
8 doesn't have the seal but says Made to USDA
9 Guidelines or Regulations, that is very
10 confusing for the consumer and it dilutes the
11 message that I think we've tried to build
12 around the USDA seal.

13 So, somehow -- we just need to
14 have truth in labeling and that's why I passed
15 around -- my son helped me with that. He has
16 Photo Shop, that example of the USDA seal
17 where it says organic and then it says the
18 USDA and it has the percent right there. And
19 that opens up the door for truth in labeling
20 and it cuts to the chase and it tells the
21 consumer exactly what they're getting. And I
22 know certifiers are probably cringing at the

1 idea. But I do think that it's a healthy
2 solution for the consumer. And the consumer
3 perspective is one of the things that I think
4 needs to be more highly acknowledged as we're
5 developing what the final end product is going
6 to be on the shelf.

7 So, you know, to answer your
8 question. Yes, the Made With is directionally
9 accurate, but I think that it needs more work
10 in figuring out what the solution is.

11 MR. GIACOMINI: Jay. Oh, Joe,
12 follow up?

13 MR. SMILLIE: Yes, I just wanted
14 to go back to Miles. I don't want, you know,
15 to take wind out of your sails or spill the
16 beans or whatever the right expression is. But
17 the upcoming guidance that the department is
18 going to be issuing for the Made With
19 labeling. Do you feel that there's any
20 synergy between what we're struggling, groping
21 to try to present to the consumer and what
22 you're dealing with on an enforcement level

1 about the Made With label? Is there anyway
2 that our recommendation could be helpful in
3 clarifying and clearing up this what we
4 believe to be valuable label claim that
5 somehow is just really not working out there
6 in the marketplace?

7 MR. McEVOY: We haven't looked at
8 your recommendation in light of the
9 development of the Made With Organic draft
10 guidance. So, we haven't done that work.
11 We'll take a look at it whether or not you've
12 passed it as a recommendation or not. We can
13 take a look at it in terms of how it relates.

14 What the draft guidance on Made
15 With Organic labeling -- Made With Organic
16 Products addresses is the percentage claim on
17 a Made With Organic Product and the types of
18 ingredients that can go into the 30 percent.
19 So, those are the two issues that are being
20 addressed in that particular draft guidance.
21 So, it's not directly related in terms of what
22 you're doing with your proposed recommendation

1 on Made With Organic. Certainly doesn't have
2 anything about using the term "certified" to
3 USDA guidelines. On the Principal Display
4 Panel it does talk about the percentage claim
5 on the Principal Display Panel and the draft
6 will say that if you do have a percentage
7 claim on the Principal Display Panel then you
8 must also have a claim that it is a Made With
9 Organic Product.

10 MR. GIACOMINI: Okay.

11 MR. FELDMAN: Just one question.

12 Thanks, Pete.

13 You're talking about labeling
14 percentage ingredients on those products for
15 which -- that fall below the 95 percent
16 category. So, how do you deal with the 95 to
17 100 percent and, you know, wouldn't consumers
18 want to know, for instance, that there is
19 somewhere between 95 and 100? A 100 would be
20 labeled certainly. And then we currently have
21 the organic label which is 95. How do you
22 reconcile not displaying the percentage 95 and

1 above?

2 MS. JAMES: Well, I guess and this
3 is just my opinion about this. Ninety-five to
4 100 I think is almost the same thing. I thin
5 kit's very hard to get to a point where you
6 actually can say 100 percent organic and for
7 reasons that I know you are all familiar with.
8 So, 95 percent to 100 is something that we've
9 already done diligently on the packaging by
10 just having the USDA seal having that option
11 that the 95 and 100 are the only two
12 categories where you can actually put the USDA
13 organic seal on the front of the package.

14 So, why change that? That seems
15 to be working. It's everything below that
16 that's where it falls apart for the consumer.

17 MS. HEINZE: Thank you for your
18 comments and thank you, in particular, for
19 bringing in these lovely personal care
20 products which are a great example of the
21 problems we're seeing on the retail shelf.

22 I was just hoping that once they

1 get to you, John, you could just directly take
2 them to Miles.

3 MS. JAMES: I think it's a pretty
4 good example. I think it's a pretty good
5 example of how we're confusing the consumer.
6 When you have that one pamphlet that I have
7 there that shows a bunch of carrots with the
8 wrap-arounds organically grown which is, you
9 know, that's the only thing. It has to be
10 organic on an agricultural product if you see
11 that twist tie in the supermarket. And then
12 that's part of their marketing campaign is
13 saying that, you know, organic carrots,
14 essential oil is in the product and they're
15 calling the front of it organic and I included
16 it in there a list of the percentage of all
17 the different body care products and most of
18 them fall within 30 percent. And they're
19 calling right on the front organic. So, here
20 you've got body care totally messed up saying
21 organic. And then you've got the Made With
22 that actually has organic and they're not

1 getting credit. And it's just kind of a mess
2 and I think from the consumer perspective, it
3 needs to be fixed.

4 And I thank you for listening to
5 me.

6 MR. GIACOMINI: Kevin.

7 MR. ENGELBERT: I spoke with NOP
8 staff years ago when I first got on the Board
9 about the percentages on the label and like
10 you said I got completely shot down. Because
11 I thought it ought to say 100, 95 or 70 and
12 the argument then was and it's probably still
13 valid, some of these labels are so small
14 consumers aren't going to be able to
15 distinguish between those numbers.

16 MS. JAMES: Well, and that's
17 something that should be taken into
18 consideration.

19 If you go the route of putting a
20 percent right in the USDA seal, there should
21 be guidelines like they're currently are about
22 how to use, you know, organic in labeling.

1 There needs to be guidelines about how that is
2 actually executed on the package.

3 MR. ENGELBERT: But I had never
4 thought of the idea of only having it for the
5 70 percent. That may very well work. I
6 hadn't thought of that because then if they do
7 see a percentage, no matter how tiny, they
8 know that it's a 70 and anything else is 95 or
9 above.

10 MS. JAMES: I got you. I got you.

11 MR. GIACOMINI: Okay.

12 MS. JAMES: Thank you.

13 MR. GIACOMINI: Further
14 questions/comments?

15 Okay. Thank you.

16 We're reached out time for another
17 break in our scheduling. Since the last break
18 we've gone from a half an hour behind schedule
19 to an hour behind schedule. So, we're asking
20 everyone to please be more considerate of our
21 time requirements as we move on through the
22 day.

1 Fifteen minutes. I'm asking
2 everybody. Fifteen minutes.

3 If at 10 minutes we could have
4 Miles and if I could have Miles and Richard
5 Matthews and Kim Dietz and Tina, we have some
6 issues to go over. If we could meet with
7 those in 10 minutes and then we'll reconvene
8 in 15.

9 Thank you. So, five after.

10 (Whereupon, the above-entitled
11 matter went off the record from 10:49 a.m. to
12 11:11 a.m.)

13 MR. GIACOMINI: We have a quorum
14 of the Board. We're ready to restart, again
15 asking everyone to please be aware of the time
16 situations. We still have a unknown flash
17 drive up here if anybody -- oh, we found that.
18 Thank you. This time I got a chocolate. All
19 right. I'm not sure you get a chocolate with
20 an unknown flash drive.

21 Okay. Lisa, are we ready? Sound
22 ready? Okay.

1 First up as we continue Phil
2 LaRocca, George Bass and Beth Unger for the
3 proxy.

4 Go ahead.

5 MR. LaROCCA: Good morning. Thank
6 you for the time to speak here. It's been
7 many years since I've addressed this Board but
8 in the past I have worn a lot of carpet out.

9 My name is Phil LaRocca. I have been an
10 organic -- in the organic industry for 35
11 years. I was first certified in 1975. I
12 believe I was the first certified apple
13 organic grower in the State of California.

14 I've been an organic inspector.
15 I've sat on the California Certifier Organic
16 Board. I've been the Vice President-- I've
17 been President on the Board and in the interim
18 of the USDA taking over the standards, my
19 title went from President to Chairman of the
20 Board.

21 Twenty-six years ago I started in
22 the wine business. I started off with the

1 French guy at the time that seemed kind of old
2 but as I look back at it now he was only a
3 couple of years older than I am now. But we
4 decided to make an organic wine and there was
5 no rule sand regulations. There was just an
6 organic community and it was in the organic
7 community that we all knew that synthetics
8 weren't allowed in organics. So, I didn't
9 waive this anti-sulphur dioxide flag, it was
10 just that we felt that you couldn't add
11 synthetics in wine and that's why we started
12 making a wine with sulphur dioxide.

13 We started off with 500 cases. My
14 winery is now 25,000 case production.

15 In the early days making an
16 organic wine just says that growing certain
17 organic crops wasn't very easy. But we
18 figured it out with new chemistry that we
19 brought to the table, with new wine-making
20 equipment, we made a damn good wine. I throw
21 this out in jest. But one of the arguments
22 that people say about organic wines is they

1 won't keep.

2 Well, on New Year's Eve Martha
3 Stewart drank one of my sparkling wines that
4 we had and gave us a write-up. So, you know
5 that Martha would not drink a bad wine. So,
6 we got Martha on our side.

7 At any rate, I dealt with this
8 issue 10 years ago. And to this day still
9 believe that synthetics should not be allowed
10 in organic production. But I was very much
11 involved with working with this Board and the
12 NOP at the time to come up with the Made With
13 Organic label. And we did that to satisfy the
14 grape growers that were growing grapes
15 organically and then bringing them to a winery
16 that wanted the process some organic grapes.

17 I want to point out at this time
18 too that there are organic wine made before
19 there was Made With Organic Grapes. The Freys
20 in Little Rock is one of the first people that
21 grow grapes organically and then process our
22 wine organically.

1 So, we work really close on this
2 and if you don't know the history, this Board
3 should look it up. But to get organic-- Made
4 With Organic label is not an easy thing. We
5 had to do some back dooring and I worked with
6 this Board, a couple of senators from the
7 State of California and Kentucky where they
8 piggy back this Made With Organic because if
9 you remember the Food and Production Act of
10 1990 outlawed sulphur dioxide in any form of
11 organic production. So, this thing was piggy
12 backed and if I remember correctly on a bill
13 to give senior citizens a lower price for
14 genetic drugs. Oh, and by the way, sulphur
15 dioxide can be used in Made With Organic
16 Grapes in the NOP program. So, that's the
17 story behind this.

18 I, you know, spent a lot of my
19 time and my passion in this thing here.

20 I do teach viticulture in one of
21 the local colleges but 99 percent of my income
22 comes off of my organic wine. I have four

1 kids. All four kids are making their income
2 off of my organic wine.

3 And if you'll look at the Frey
4 paperwork, when people say you can't do this,
5 there were 3.75 million bottles and this is
6 just a rough estimate on the low side that
7 were produced and consumed in 2009. So,
8 you're going to tell the 3.75 million people
9 that bought certified organic wine that it is
10 no good, then you should be asked of yourself.

11 And in conclusion, I want to say
12 that I used to testify 10 years ago and this
13 figure has gone up but it was 119 different
14 synthetics that were allowed in the use of
15 commercial wine-making. And the only one that
16 the public has to be notified about is the use
17 of sulphur dioxide. So, it would be an awful
18 oxymoron to have a USDA certified organic wine
19 that has -- that's going to allow the only
20 chemical that the FDA makes it mandatory for
21 wineries to put on their bottle.

22 Questions.

1 MR. GIACOMINI: Questions/
2 comments?

3 John.

4 MR. FOSTER: Let's just say the
5 rule changes and one would be able to make an
6 organic claim. Would you highlight the fact
7 that you do not use sulphur dioxide even more
8 than you do the same amount you do?

9 MR. LaROCCA: We've talked about
10 that. We're actually afraid that we might not
11 be able -- just like you can't put-- we don't
12 use genetically modified yeast on our label.
13 They might stop us from using saying that we
14 don't use any sulphites on our label just like
15 the bovine growth hormone issue with wine.

16 And I'd also like to add on this
17 too, John, that in terms -- I don't know why
18 the opponents are pushing for this if they
19 think that they're going to make -- if this is
20 going to be an economic factor to them which
21 shouldn't be factored into organic. But we
22 have to factor it in because as being the

1 first people that pioneered this industry,
2 it's going to hurt our business. And I don't
3 think that that would be fair.

4 Joe.

5 MR. GIACOMINI: Again, Joe.

6 MR. LaROCCA: Excuse me. Joe and
7 I go way back. Excuse me. Mr. Chairman,
8 excuse me.

9 MR. SMILLIE: So, Phil, I just
10 want to be clear for the public record that
11 you're certified organic wine, but you're not
12 opposing the continuation of the Made With
13 Organic Grapes. So, you're more than happy to
14 continue to allow organic grape growers to
15 have their grapes sold as -- in wine that is
16 Made With Organic Grapes and the distinction
17 being that the sulphites aren't allowed and
18 the certification -- that the grape growers
19 could still have a market for their
20 organically grown grapes?

21 MR. LaROCCA: That is correct,
22 Joe, and if you look at what is it. 2118 says

1 if you can do it naturally, then you shouldn't
2 add a preservative or you shouldn't have to
3 add a synthetic. So, I'm going along with
4 that with organic but I also say, I feel if
5 you make a crappy potato chip when you put
6 organic potatoes in it, you can tell the
7 consumer that. So, I'm not opposed to the
8 Made With category.

9 MR. GIACOMINI: Jay.

10 MR. FELDMAN: Thank you for your
11 comments.

12 Are there any examples that you
13 can come up with that would justify the need
14 for sulphites in organic wine production?

15 MR. LaROCCA: Absolutely not. And
16 I say that because it's harder. You can go
17 to, for example, go to an organic carrot
18 grower and ask him if he could use a pre-
19 emergent Round Up before he plants his
20 carrots. Of course, he's going to make it
21 easier for him. You know, sulphites make it
22 easier for the wine maker. So, other people

1 that are listed on that presentation that Paul
2 gave you, they'll tell you, we work harder at
3 it.

4 MR. FELDMAN: Thank you.

5 MR. GIACOMINI: Thank you.

6 MR. LaROCCA: Thank you.

7 MR. GIACOMINI: George Bass, Beth
8 Unger with the proxy and Dave Martinelli.

9 MR. BASS: Unfortunately, our
10 manager had a family death so we have another
11 proxy that's doing our time.

12 So, to the committee and the staff
13 many thanks for all your time, all your hours
14 helping the NOP and NOSB, producers and
15 customers. Thank you especially for the
16 volunteers.

17 I want to talk to you about those
18 barns, the hens, the porches and then two
19 surveys.

20 Number one, we have about 6,600
21 layers in each barn. We have about 12 barns.
22 We have wonderful windows on each side of the

1 barn. We have benches on both sides with feed
2 and also water. In the center are the nests.
3 There is a division in the middle so they're
4 for 3,200 or something and another 3,300. So,
5 that's really what goes. It's an old pipe,
6 but it's good. I think it's wonderful.

7 Also, I just want to explain a
8 little bit of hens. A lot of people don't see
9 a hen --

10 MR. GIACOMINI: George? You not
11 only need to be at the mic but you need to be
12 at the podium because on the record it's
13 collected through the other microphone.

14 MR. BASS: Oh.

15 MR. GIACOMINI: So, one is the amp
16 system, the other one is on the record. So,
17 yes. Just stay right there and--

18 MR. BASS: Right here?

19 MR. GIACOMINI: Yes.

20 MR. BASS: Okay. All right.

21 Trying to explain -- I think
22 they're very happy. I think those hens are --

1 I think they're very, very happy.

2 Early in the morning they start at
3 about 5:30 for breakfast. Take feed and water
4 on the benches. And then number two, the hens
5 jump down onto the floor and they jump up
6 again to the nest too. And they walk, they
7 run, they jump again. They jump up and down,
8 up and down. And they're having a wonderful
9 time. They have good exercise.

10 Then afterward they have a little
11 bit of a burrow into the nest and so they have
12 a nap. And their eyes are shut, quite a few.
13 And then others stay in the burrows and then
14 they have a great dusk bath. I don't know if
15 you've ever seen them. Maybe a lot of people
16 here -- maybe they have some, they understand.
17 They really have a lot.

18 But we think it's good and I think
19 they have -- I think those hens are much, much
20 better inside while they're outside.

21 Not the moon space but anyway. And
22 then there is more exercise, more social

1 interviews, Then the day is done at about
2 6:30 p.m. And the porches -- this is a
3 problem but I think it's not a problem at all.
4 I think it's at 2002, the porches were
5 certified. They are compliant and they are
6 legal. I think the porches have a lot of air,
7 a lot of sun, especially on the sides and good
8 health. And we don't have any diseases, no
9 worms, no migration of wild birds with Avian
10 Flu, no fox and coyotes, no manure, goes into
11 a huge reservoir. A lake very close to us for
12 the water of Boston of about 30 towns. So,
13 they need -- okay.

14 I've got two surveys. One to talk
15 about 100,000. They finally got 80.5 positive
16 of about thee hens inside. And then two we
17 had another survey and then we had about 450
18 fertilized and this time the positive was
19 96.2. So, therefore, summary.

20 I just want to talk about one
21 thing a 250 million dead of the poultry people
22 in China in that area. It's not here in the

1 United States but actually there are 63
2 countries at least of this Avian Flu. It's
3 very hot and the porches -- summary. The
4 porches continue as a compost of the past and
5 all the future.

6 Thank you very much.

7 MR. GIACOMINI: Okay. Thank you.

8 Questions and comments? Okay.

9 Lisa, could you put the picture of
10 the porch back up?

11 Could you tell us what the floor
12 and the roof on those are?

13 MR. BASS: Say that again, sir?

14 MR. GIACOMINI: Could you tell us
15 what the floor surface and the roof on those
16 porches are?

17 MR. BASS: The floor.

18 MR. GIACOMINI: At the mic please.

19 MR. BASS: Right here.

20 MR. GIACOMINI: No, the floor in
21 the porch, what is the flooring and what is
22 the roof?

1 MR. BASS: The boards outside.

2 MR. GIACOMINI: Boards, okay. And
3 then what's the roof on that?

4 MR. BASS: This is plastic so the
5 sun comes through.

6 MR. GIACOMINI: Okay.

7 MR. BASS: Yes.

8 MR. GIACOMINI: Okay. Thank you.

9 Okay. Beth Unger, Dave Martinelli
10 and Edward Gildea.

11 Beth. You're the proxy.

12 MS. UNGER: Good morning. I'm
13 Beth Unger with Crop Cooperative and I'm going
14 to give you a little time back and keep this
15 very brief.

16 I was pretty impressed with
17 yesterday's discussion and I just want to
18 respond to that a little bit. But first I
19 want to thank Lisa McCrory for her comment on
20 the animal welfare document. I thought that
21 was very well thought out and very well
22 presented.

1 And second to finish up my comment
2 from Monday, I wanted to address the nutrient
3 vitamin and mineral and Sunset Review portions
4 of the agenda in tandem.

5 But beginning with OTA's comment.
6 The Organic Trade Association comment on this
7 particular topic was pretty well done and they
8 did address the questions of the Handling
9 Committee and I thought that was way better
10 than my comments.

11 But I want to go on and tie those
12 two together. Because unless I am not
13 understanding what is being said at the April
14 meeting and then again at this meeting, this
15 is my understanding.

16 I have the National Organic
17 Program twice now in reference to the nutrient
18 vitamin and minerals discussion, comment on
19 having the committee take a look at the 1995
20 recommendation. I think that is appropriate.
21 I think that is appropriate because the
22 recommendation really had a different

1 intention in what the ultimate listings did.

2 Also, a completely different
3 Board, the 2000 Board in response to the
4 pending final rule, the proposed rule that
5 commented on the items in there and made it
6 perfectly clear in their comments that they
7 disagreed with the annotation that was put on
8 nutrient vitamin and mineral listing which was
9 at 21 CFR 104.20. I think that both of those
10 things are very relevant things to review and
11 to look at.

12 And going back to, you know, those
13 two comments, and how it relates to Sunset
14 Review, the policy that you have before you
15 that took up a considerable amount of meeting
16 time last evening in discussion which was a
17 very healthy discussion, I'm going to go back
18 to being probably the only person in this room
19 or on record that stated I think that the NOSB
20 is limiting itself when they want the
21 annotations to only be more restrictive. That
22 was a comment that Jay had mentioned in his

1 presentation about respect the work of other
2 Boards. There were two other Boards in
3 relation to this one specific listing that had
4 an issue with how everything played out.

5 If the Policy Committee's
6 recommendation goes through with that
7 restrictive part of annotations, the Handling
8 Committee's hands are tied. Why bother
9 reviewing the 1995 recommendation or the 2000
10 omnibus response to the proposed rule?

11 Dan and Kevin, thank you very much
12 for your discussion during the 101B
13 discussion. I thought you two brought great
14 clarity to that whole recommendation. I would
15 hope the committee would go back and take a
16 look at the things Dan and Kevin had to say
17 about it because I believe in that
18 recommendation clarity is important and the
19 two things that they clarified were good audit
20 trails and ownership issues and I thought
21 those were quite relevant.

22 I promised I would shorten my

1 time. And so in closing, just to give you
2 about 45 seconds back, please when the next
3 Livestock Committee takes up the methionine
4 thing all over again, we need a new text
5 review. The first one was flawed and secondly
6 I'm totally looking forward to the USDA
7 supporting the research of methionine --
8 synthetic methionine in poultry diets.

9 MR. GIACOMINI: Questions?

10 Joe.

11 MR. SMILLIE: You weren't the only
12 person. I was also thinking that but again
13 the idea as our charge is to restrict
14 synthetic use which I've always felt
15 uncomfortable with but I didn't say anything.
16 But you brought up an excellent point that
17 simply limiting it to restricting annotations
18 really does tie our hands. There are many
19 things beyond -- as well as restricting and
20 the example of the accessory nutrients is one
21 that I hadn't thought of. But that is a good
22 example where we would want to not expand but

1 change, you know. I don't like necessary the
2 word "expand" and that is a good example that
3 serves the illustration that maybe we should
4 look at the simple phrase.

5 Mostly that's what we will be
6 doing. My feeling is that -- that is the
7 general intent is to restrict. But we should
8 keep it open so that if necessary, if there's
9 a very good reason as you pointed out, we may
10 want to have the ability to expand an
11 annotation. And won't necessarily mean --
12 yes.

13 Thank you.

14 MR. GIACOMINI: I think the
15 difference here -- I'll get to you next, Jay,
16 if you need to supplement my comment here.

17 The difference here is that the
18 framework of this recommendation is the
19 annotation change within the Sunset process.
20 There's no restriction on annotation changes
21 outside of the Sunset process within this
22 document. Okay. So, it's just within when

1 it's done with in the Sunset.

2 Now, we have all that debate of
3 whether that's the appropriate time and how --
4 but this document as I understand it would
5 only be limiting the annotation change within
6 that document.

7 MS. UNGER: Can I please respond
8 to that, Dan?

9 MR. GIACOMINI: Okay.

10 MS. UNGER: This is a Sunset
11 Review item. It is very relevant to this
12 discussion.

13 MR. GIACOMINI: Thanks.
14 Jay.

15 MR. FELDMAN: Thanks, Beth.

16 I would like to hear your response
17 to this line of thinking. And this goes to
18 your point, Joe.

19 Are we not constrained by the
20 statutory language that uses the term "Sunset"
21 which means remove? The process of sunseting
22 is to re-evaluate the existing uses that are

1 on that list, you know, in a technical sense
2 to remove those uses and all we're doing with
3 this proposal is we are restricting the
4 removal of those uses. I would argue that
5 given the construct of the statute that our
6 hands are tied on that point -- on your point
7 of expansion and that issue of expansion is
8 really left to the petition process which
9 offers anybody an opportunity to come in and
10 expand the uses of a particular material or
11 substance.

12 Having said that, I think the
13 issues that we need to be able to deal with
14 perhaps during Sunset which may be viewed by
15 some as an expansion, are clarification
16 issues. So that like we were talking
17 yesterday about a clarification of a previous
18 understanding at the time of allowance or at
19 the time of a decision. So, I think we are
20 constrained by the law which requires us to
21 sunset or remove and that what we're doing
22 through this proposal is seeking to restrict

1 the removal of that product in certain ways at
2 the same time that we allow it to remain for
3 the allowable uses.

4 MR. GIACOMINI: Well, I think
5 there's some debate over what OFPA is
6 requesting us to do there, but we won't get
7 into it here.

8 Kevin.

9 MR. ENGELBERT: Yes. I'd just
10 like to briefly reiterate basically what Jay
11 has said that the committee was firm in its
12 belief that any expansion of an annotation or
13 any additional annotation should be done
14 strictly through the petition process so that
15 in keeping with what's been done in the past.

16 MR. GIACOMINI: Joe.

17 MR. SMILLIE: In spite of the
18 Chairman's grimace, Beth's point though is
19 that the sunseting of the 104.20 which was
20 not our recommendation, which was not the NOSB
21 recommendation, was the NOP's interpretation
22 of our recommendation. So, in a real sense by

1 changing that annotation we would be expanding
2 it from their current interpretation of it

3 MR. GIACOMINI: Okay.

4 I have a relevant question for
5 Beth.

6 Have you had a chance to review
7 the methionine White Paper that was submitted
8 by and posted -- I'm positive it was posted
9 from the Methionine Task Force? And if you
10 have, when we reviewed it, we felt that it
11 filled in fairly well, very well. Even though
12 some may consider aspects of it bias from the
13 source, we felt that it considered and filled
14 in very well any holes that may have been in
15 the methionine tap. Have you ever had a
16 chance to review that document?

17 MS. UNGER: Not thoroughly.

18 MR. GIACOMINI: Okay.

19 MS. UNGER: Yes. I have seen it
20 but --

21 MR. GIACOMINI: Okay. I agree,
22 it's getting -- you know, they're all getting

1 old but at the time that was what we were able
2 to use that as a -- and I was wondering if you
3 had the same perspective. Okay.

4 Anymore questions?

5 Okay. Thank you.

6 Dave Martinelli, Ed and Aaron

7 Brin.

8 MR. MARTINELLI: Dave Martinelli,
9 Common Natural Foods.

10 My topic is Animal Welfare and I
11 had promised myself I was going to come up
12 here and not say the M Word but unfortunately
13 I'm going to talk primarily about methionine.

14 You know, first in acknowledgment,
15 I do want to thank strictly the program for
16 working so quickly from the time of the last
17 meeting to actually coming out with in turn
18 final rule. I know the time frame was short.
19 The pressure was severe, producers were very
20 concerned but we're very appreciative of the
21 fact that it was in final rule and we could at
22 least have some clarity for the next 24 months

1 or 23 months soon.

2 I guess the frustrating part, I
3 expect it's frustrating for the Board. It's
4 certainly frustrating for producers is that I
5 really sense the Board wanted to kind of come
6 to a final resolution of methionine at the
7 last meeting but unfortunately the whole step-
8 down leg of the process has kind of left the
9 Board back facing the issue again and
10 producers are very concerned about what
11 happens in 2012.

12 So, I think in the spirit of
13 trying to put this into a little bit of
14 context and not cover a whole lot of ancient
15 history, I do thin kit's important coming out
16 of the last meeting that we all focus on the
17 fact that there are a couple of key areas
18 within the methionine discussion that I think
19 the industry and the NOSB have agreement.

20 For one, I think this whole notion
21 of organic standards prescribing a vegetarian
22 diet for an animal that is essentially an

1 omnivore is unnatural and I think the actual
2 commentary at the last meeting was that it's
3 an abnormal diet. And at least I think
4 there's a recognition that we're not asking
5 for methionine for any purpose other than to
6 correct a diet that is fundamentally
7 unbalanced not in nature but unbalanced in
8 organic statute.

9 The second thing is that different
10 species of birds have different methionine
11 needs and even with any given species or given
12 type of birds such as layers and broilers,
13 there are different needs of different stages
14 of live. For example, young birds, whether
15 they're young broilers as chicks or young
16 pullets have higher -- generally higher
17 methionine needs than birds that are older.
18 And that was really the reason behind the task
19 force's suggestion that it be computed as an
20 average methionine usage over the life of the
21 bird as opposed to an absolute fact.

22 So, I think the acknowledgement

1 that we have of fundamental need for
2 methionine as well as different needs for
3 different species, I think the only
4 outstanding issue and it's not insignificant,
5 but the outstanding issue is, the
6 justification of the step-down.

7 Okay. The NOP is struggling with
8 economic and scientific support for the
9 stepdown levels. I can tell you from the
10 producer's side, nutritionists have struggled
11 with formulating for not even the stepdown
12 levels. They're struggling to formulate the
13 levels we're currently operating out of
14 effective October 1.

15 To achieve the step-down levels as
16 proposed my feedback from the nutritionists
17 that we've talked to, our own and others
18 within the industry is that they will have to
19 formulate using an excessive level of crude
20 protein. I mean, that's really the only way
21 to get methionine to the animals and obviously
22 that has significant economic, environmental

1 and health issues for the birds. I mean,
2 you're going to have issues with them in the
3 house.

4 So, what I'd like to pose and in
5 the interest of kind of moving this forward is
6 that, you know, the task force has been
7 active. It continues to fund research. It
8 will continue to stay active obviously. But
9 we will focus our efforts in the very near
10 future on working with our resources, working
11 with our nutritionists on really trying to
12 come up with what is the scientific number?
13 What is the minimally acceptable level of
14 methionine that we can live with?

15 And I'm not here today to tell you
16 what that number is, but we want to go out and
17 canvass our resources, come up with what we
18 propose the number to be, submit that in
19 petition form to the NOSB. We understand
20 that, you know, given kind of the process it
21 needs to go through for the time line for this
22 is really compressed, even though we're

1 talking about 2012 deadline. I understand how
2 the years turn relatively slowly. So, we will
3 be focused on trying to get this done as
4 quickly as possible, get something to you all
5 prior to the next meeting, prior to the spring
6 meeting. Hopefully in time to be discussed at
7 the spring meeting or if not there certainly
8 in the meeting in the fall so we can hopefully
9 come to resolution on this and move forward
10 and move past it.

11 And that's really my methionine
12 task force hat, not so much my Common Natural
13 Foods hat. We've got a whole Common Natural
14 Foods presentation but I'm going to allow Mark
15 McKay who is here from Common as well to
16 really get into that and talk about the animal
17 welfare -- our perspective on the animal
18 welfare recommendations.

19 MR. GIACOMINI: Kevin.

20 MR. ENGELBERT: That minimal
21 number is something we have been after since
22 I've dealing with this on the Board and the

1 sooner the better. Thank you.

2 MR. GIACOMINI: Questions,
3 comments?

4 Tracy.

5 MS. MIEDEMA: Will the methionine
6 task force be able to help with this other
7 data point that the Livestock Committee has
8 been tasked with trying to figure out the
9 economic impact of the stepdown?

10 MR. MARTINELLI: I think we can
11 certainly help with that. I would ask for if
12 it's possible if we can get a little guidance
13 maybe from the program in terms of what --
14 what we need to provide in that regards. But
15 I'm happy to pitch in in any way possible.

16 MR. GIACOMINI: Well, I think it
17 would be hard for you guys to pitch in because
18 overall from the task force you didn't fully
19 support the stepdown.

20 MR. MARTINELLI: In terms of
21 getting the information though --

22 MR. GIACOMINI: Yes.

1 MR. MARTINELLI: -- in terms of
2 assessing what the economic implications are.

3 MR. GIACOMINI: Yes.

4 MR. MARTINELLI: We can do that.

5 MR. GIACOMINI: We will try.

6 Any other questions? Okay.

7 Thanks, Dave.

8 All right. Edward, Aaron and
9 Bill.

10 MR. GILDEA: Good morning. My
11 name is Edward Gildea. I'm the President of
12 Converted Organics. Converted Organics is a
13 publicly held company with its share of common
14 stock traded on NASDAQ under the trading
15 symbol COIN.

16 Converted Organics manufactures
17 organic fertilizers by recycling food waste.
18 The recycled food waste using a proprietary
19 microbial digestion process that we call high
20 temperature liquid composting.

21 One of the food wastes that we
22 recycle is corn steep liquor. Thank you for

1 the opportunity to express my support, though
2 I'm in a minority position of the Crop
3 Committee that corn steep liquor is not
4 synthetic and should be allowed for continued
5 use in organic crop production.

6 Converted Organics operates its
7 high temperature liquor composting process at
8 a manufacturing facility in Gonzales,
9 California. No prohibited substances are used
10 in the process.

11 Corn steep liquor is an ingredient
12 that is used in our products. It is always
13 digested or run through the microbial
14 digestion process before it is offered as a
15 product. We never use it directly as a
16 product without having gone through the
17 digestion process. To my knowledge no one in
18 the industry uses corn steep liquor as a
19 fertilizer without first processing it in some
20 fashion either by digestion or composting.

21 Food wastes are allowed as a feed
22 stock in compost operations regardless of the

1 sources of the food waste. Corn steep liquor
2 is a food waste resulting from the
3 manufacturing of corn products such as organic
4 corn starch.

5 As a food waste if it is digested
6 or otherwise treated by a composting process,
7 it ought to remain allowable feedstock
8 acceptable for use in organic crop production.

9 Corn steep liquor is a food waste
10 resulting from corn wet milling processes. It
11 contains an insignificant amount of the
12 processing aid sulfur dioxide. Corn starch
13 which results from the exact same wet milling
14 process is included on the National List under
15 17 CFR Section 205.606 as an agricultural
16 product allowed in products labeled as organic
17 as a result of a determination made in 1995 by
18 this Board.

19 The determination was correct in
20 1995 and it's still correct today. Sulphur
21 dioxide is the same. Corn starch is the same.
22 The waste called corn steep liquor is the

1 same.

2 Admittedly, we add to the process
3 by recycling the corn steep liquor and
4 reducing the amount of the So2 that's in the
5 corn steep liquor that we received through the
6 digestion process.

7 It's important for manufacturers
8 and growers to have consistent decisions from
9 organizations such as this. When a small
10 manufacturers cannot rely on consistency in
11 decision making by the NOSB or other
12 committees, the inability to rely on it is
13 detrimental to our success as an organic
14 fertilizer manufacturer.

15 Moreover, consistent decisions
16 arrived at through a consistent process do not
17 contemplate behavior such as publishing and
18 untimely revised committee decision discussion
19 paper. Apparently, in support of a majority
20 opinion. This kind of casual disregard for
21 process doesn't fit within the definition of
22 consistent decisions arrived at through a

1 consistent process.

2 As confused as it may be, the
3 decision of the minority position ought to
4 stand. There are other examples of food
5 wastes that result from food processing that
6 contain minimal amounts of processing aids
7 that are permitted to be used as an ingredient
8 in the manufacturing of products permitted for
9 use in organic crop production.

10 For example, food wastes from
11 conventional tomato processing facilities that
12 use potassium hydroxide as a processing aid to
13 remove the skins as residues in insignificant
14 amounts and the food wastes from these
15 facilities may be used as a feed stock in
16 compost for organic production.

17 Notwithstanding the fact that potassium
18 hydroxide is not permitted for use in organic
19 crop production.

20 Corn steep liquor should be
21 allowed for use even if the So₂ synthetic --
22 because the So₂ synthetic levels are

1 insignificant and virtually non-detectable in
2 our final fertilizer products.

3 As an important part of any NOSB
4 decision, it is not necessarily whether the
5 product is synthetic or not but it is whether
6 or not the product is harmful or toxic to the
7 soil. The NOSB should focus on the fact that
8 corn steep liquor is not harmful to the soil.
9 In fact, if you focus on the presence of So₂,
10 you should note that sulphur can be beneficial
11 to the soils.

12 If the corn wet mill process is
13 determined to create a synthetic due to the
14 use of So₂, then all products in this process
15 -- is that my five minutes?

16 MR. GIACOMINI: That is five.

17 MR. GILDEA: Sorry. MR.

18 GIACOMINI: No, that's fine.

19 Okay. Any -- Tracy.

20 MS. MIEDEMA: I want to make sure
21 I understand your concern. For your business
22 you have that digestate that comes from your

1 anaerobic facility and that digestate was
2 produced in part with corn steep liquor.

3 MR. GILDEA: Well, no --

4 MS. MIEDEMA: -- is that today?

5 No.

6 MR. GILDEA: We have a product
7 that we manufacture through aerobic digestion,
8 not anaerobic digestion. And we use corn
9 steep liquor as an ingredient in that product.

10 MS. MIEDEMA: And is your concern that if
11 this was -- corn steep liquor was deemed
12 synthetic that your product would then not be
13 allowed in organic production or are you
14 simply arguing the case for corn steep liquor
15 in organic crop production?

16 MR. GILDEA: Well, the real reason
17 -- the real reason I'm here arguing is our
18 business is built around recycling food waste.
19 And if this committee can decide that this
20 particular food waste can't be used in
21 creating organic fertilizers then I have to
22 ask, what's next? What other food waste that

1 we currently use in creating our products is
2 going to be banned because of a process
3 unrelated to us?

4 We currently process all manner of
5 different kinds of food wastes from all
6 different kinds of waste sources. We don't
7 always know where it came from. It comes in
8 garbage trucks that are dumped in a tip floor
9 and we clean it up and we put it through the
10 digestion process and we create fertilizer.

11 Could you decide that, I don't
12 know. Pick a crop. Lettuce with pesticides
13 can't be used as part of our process anymore,
14 we have to take out the lettuce.

15 MS. MIEDEMA: I have a follow-up
16 question then for the program.

17 My understanding is that the rules
18 for compost and what can go into compost is
19 very different than what can be applied
20 directly to the field. And that a compost
21 could have a bunch of say Twinkies thrown in
22 it. That's not an issue. But something like

1 corn steep liquor is what we're debating as
2 being potentially prohibited in organic crop
3 production. Is that a correct way to
4 characterize this?

5 MR. McEVOY: The debate is about
6 corn steep liquor and whether or not it's a
7 synthetic or non-synthetic. In terms of crop
8 residues, food processing waste that consists
9 of residues of vegetables or fruits from food
10 processing, that's allowed as an input in
11 organic systems. In compost or directly
12 applied to soil, it's green waste. Food
13 processing waste, a natural substance. It's
14 allowed as a soil amendment to organic fields.

15 MR. GIACOMINI: I am not sure I
16 understood that answer either, Miles, but
17 maybe we'll take that up later.

18 Jeff.

19 MR. MOYER: Just one quick
20 question. Maybe you can't answer or won't
21 answer it.

22 In terms of CSL in your compost,

1 what percentage of your business is --

2 MR. GILDEA: Thirty percent of
3 what we produce in California is the product
4 based solely on corn steep liquor and another
5 20 percent has corn steep liquor product
6 blended with other organic products.

7 MR. MOYER: Point of
8 clarification. Are you saying 30 percent of
9 your compost is corn steep liquor or is there
10 corn steep liquor in 30 percent of your
11 product?

12 MR. GILDEA: What I am saying is
13 30 percent of the products that we sell in
14 California use corn steep liquor as the base
15 of the product.

16 MR. MOYER: I see.

17 MS. MIEDEMA: Miles, I want to ask
18 you a more specific question. Hopefully,
19 we'll be able to get to the bottom of this.

20 If Corn steep liquor is deemed
21 synthetic can this gentleman use corn steep
22 liquor to create his product and use it in

1 organic --

2 MR. McEVOY: If corn steep liquor
3 is considered a synthetic, then no, he could
4 not use it as an input in a compost.

5 MS. MIEDEMA: Would he be able to
6 use a Twinkie in that compost?

7 MR. McEVOY: Yes, a Twinkie so far
8 is considered a food product of food, I guess
9 that could be put into organic compost. That
10 could be applied to an organic field.

11 MR. GIACOMINI: Jay.

12 MR. FELDMAN: Another question for
13 the program.

14 MR. GIACOMINI: It's your guys'
15 dinner.

16 MR. FELDMAN: Yes. Could this
17 company consider its end product a soil
18 amendment and if the Board were to choose to
19 allow a synthetic soil amendment in the form
20 of corn steep liquor could he -- could this
21 product be applied in organic production?

22 MR. GIACOMINI: Jay, mic.

1 MR. McEVOY: Okay. So, if the
2 Board decides that corn steep liquor is a
3 synthetic, then it's not on the National List
4 as an approved synthetic then it's a
5 prohibited substance and could not be used for
6 either direct application or as an ingredient
7 in a compost.

8 MR. GIACOMINI: Follow up.

9 MR. FELDMAN: Quick follow up.

10 Now, if the Board were to take the
11 next step to put it on the National Organic
12 Program could it be used under 601, whatever
13 that is?

14 MR. GIACOMINI: 601 is fine. What
15 we --

16 MR. FELDMAN: 601(j), Section (j)
17 as a plant or soil amendment.

18 MR. GIACOMINI: Kevin.

19 MR. McEVOY: So, if the Board
20 consider it a synthetic and adds it to the
21 list, it would have to then be -- go through
22 a proposed rule and the final rule process

1 before it would be allowed. So, during that
2 interim it couldn't be allowed and then the
3 question is, does it meet the OFPA criteria in
4 terms of an allowed synthetic? So, there's a
5 couple of questions there that would need to
6 be answered in order for corn steep liquor, if
7 it's deemed a synthetic to go onto the
8 National List as an approved input.

9 MR. FELDMAN: I would just like to
10 say for the record here that and Kevin pointed
11 this out to me so I don't want -- if you'd
12 like to explain this I -- that the Board has
13 previously under 601(j)(7) allowed liquid fish
14 products with the annotation, can be Ph
15 adjusted with sulfuric, citrus or phosphoric
16 acid, the amount of acid you shall not exceed
17 the minimum needed to lower the Ph to 3.5.

18 So, there is precedent here on the
19 Board to allow as a soil amendment a material
20 that has been manipulated with sulfuric acid.

21 MR. GIACOMINI: Tina.

22 MS. ELLOR: So, here would be my

1 question. And I don't know the full history
2 of why we were asked to look at corn steep
3 liquor and not other food processing wastes.
4 But in the future if somebody lodged a
5 complaint about tomato processing wastes being
6 processed with a synthetic and, therefore,
7 it's a synthetic. Would we be taking a look
8 at that too?

9 MR. McEVOY: The reason why this
10 came up is because OMRI and WSDA had been
11 allowing corn steep liquor as a non-synthetic
12 input for many years and they made a
13 determination through their process that it
14 was not non-synthetic but that it was
15 synthetic.

16 The process of how they did that
17 was inconsistently being -- was being applied
18 inconsistently because they have different
19 procedures. So, WSDA was starting to tell
20 growers that they couldn't use products with
21 corn steep liquor in it and OMRI was still
22 allowing products. Some products were not

1 being allowed to be used because of the way
2 that their systems are set up. So, from a
3 fairness perspective, we thought that this
4 should be a determination not by OMRI and WSDA
5 but it's really a Board decision to determine
6 whether something is a synthetic or a non-
7 synthetic. And so for many years this was
8 accepted in the organic certification arena as
9 a non-synthetic. A change was being
10 contemplated. We feel that that's an NOSB
11 decision, not the decision by an individual
12 certifier.

13 So, we brought the issue to the
14 Board for the Board to consider as one
15 specific subject or top, corn steep liquor.
16 Long term, I think what needs to happen is
17 that the NOP in consultation with the NOSB
18 needs to create a generic list of approved
19 substances. OMRI already has a generic list
20 of approved substances. Most certifiers and
21 producers rely on that list, but that need sot
22 be endorsed or accepted by the National

1 Organic Program in collaboration with the
2 National Organic Standards Board so that it's
3 a comprehensive list of everything that is
4 allowed to be used. It includes non-
5 synthetics and synthetics and then we would
6 not have to answer these individual questions
7 through this process but through some other
8 process.

9 MR. GIACOMINI: Do you have a
10 follow up?

11 MS. ELLOR: Yes. What I am trying
12 to wrap my mind around is this is a -- I think
13 this is a food processing waste and so any
14 waste of food processing then would need to be
15 on some sort of generic list to be used? I'm
16 just not, I mean, you know, I don't want to
17 beat this because I know we're going to beat
18 it again tomorrow.

19 MR. GIACOMINI: Okay. We'll
20 continue this right now but does anyone have
21 direct questions for our speaker? Okay.

22 We will let you sit down then.

1 MR. GILDEA: Thank you.

2 MR. GIACOMINI: And then Jeff.

3 MR. MOYER: Unlike Tina I do want
4 to beat this one just a little bit more
5 anyway.

6 I mean from my perspective I see
7 that we're asking two totally separate --
8 well, maybe interconnected but two totally
9 separate questions.

10 One is, is the product synthetic
11 of non-synthetic? The other is, can it be
12 used in a composting process to clearly --
13 many of us as farmers make compost that use
14 products that could conceivably have synthetic
15 ingredients in it, whether it's from food
16 waste, from manure products, from grass
17 clippings to tree leaves. There's lots of
18 materials that come into my site that could
19 conceivably and most like do have some
20 synthetic materials vested in that that as far
21 as I know that doesn't mean we can't use it to
22 make compost.

1 So, I don't understand. I mean,
2 if the question is, are those materials
3 synthetic? Yes, clearly they are. But that
4 doesn't stop us and never has stopped us as an
5 organic community from using those materials
6 in compost, not as -- we could not take those
7 and put them directly into our production
8 system but through the compost process we can.
9 And so I think we're looking at two questions
10 here and I need some clarification.

11 MR. McEVOY: Yes, I think you're
12 looking at one question and that's whether or
13 not corn steep liquor is a synthetic or non-
14 synthetic. And then we've clarified this in
15 the guidance on green waste where the
16 distinction is if you're creating a compost
17 that any of the ingredients that go into that,
18 any of the feed stocks have to be non-
19 synthetic. Have to be natural feed stocks.
20 So, lawn clippings, food processing waste is
21 considered non-synthetic.

22 Now, those lawn clippings may

1 contain some pesticide residues which are
2 synthetic but that doesn't make the lawn
3 clippings synthetic in terms of the green
4 waste guidance that is in the program
5 handbook. This came up with the bifenthrin
6 issue in California last year where the
7 question was, after the composting process
8 there were still bifenthrin residues in the
9 compost, did that make that compost ineligible
10 to be used as an organic input? We've
11 determined that the bifenthrin residues are
12 residues. They're not ingredients so
13 therefore that can be allowed as long as it
14 doesn't lead to contamination of the soil or
15 their crops. And with the bifenthrin in
16 particular there was no evidence that it did
17 lead to contamination of the soil or the
18 crops.

19 If you want to eliminate non-
20 organic crop residues or food processing waste
21 as an organic input or non-organic manure and
22 that's a whole different question than what I

1 think is on the table here today which is
2 whether corn steep liquor is a natural or
3 synthetic.

4 MR. GIACOMINI: That is -- okay.

5 MR. MOYER: I just wanted to say
6 that was very helpful in clarifying that in my
7 mind and I appreciate that. Thank you, Miles.

8 MR. GIACOMINI: However though,
9 Miles, if we're really going to look where
10 this goes, I would question the answer that
11 you gave to Tracy on the Twinkie. The Twinkie
12 contains synthetic substances, OFPA 605 and
13 not OFPA 601 and going into a compost for 601,
14 usage in crops, may contain things that are
15 not allowed.

16 So, Kevin, did you have a comment?
17 Okay. Any more comments on this one?

18 Joe.

19 MR. SMILLIE: Yes, I'm less
20 enthused about your answer because if you were
21 following -- I may have this wrong, but my
22 thinking is if you were following this line of

1 thinking on your green waste issue, then you
2 wouldn't have brought up the CSL issue as an
3 issue because it is compost. It's not applied
4 directly. It's compost so it should have been
5 part of the green waste guidance document and
6 not a special synthetic issue is the way I
7 look at it.

8 MR. McEVOY: No, the difference is
9 that in a compost you can't use urea. You
10 can't add urea as a synthetic input. If corn
11 steep liquor is considered synthetic you
12 couldn't use corn steep liquor as a feed stock
13 in compost. That's why it's a very different
14 situation.

15 MR. GIACOMINI: Okay. Can we get
16 back to public comment? I think this is a
17 huge debate, whether we continue it tomorrow
18 or later on today. We were an hour behind
19 when we started this session and like I said,
20 it's your dinner.

21 So, Aaron, Bill and Ed.

22 MR. BRIN: Hi. I'm Aaron Brin.

1 I'm a beekeeper in southwest Wisconsin. I'm
2 also the Inspection Manager at MOSA and I've
3 been a member of the ACA working group on
4 apiculture guidance.

5 I'm here to support the
6 recommendation of the Livestock Committee and
7 also I support adding formic acid to the
8 National List for varroa mite control in honey
9 bees.

10 Listening to some of your
11 questions, Monday I guess, it was -- I wanted
12 to -- I saw that you were concerned about the
13 land area, the forage area. 1.8 miles. It's
14 a large area to be either organic or wild
15 crop. I understand that. It's a very large
16 area. However, I want to say in a lot of ways
17 it's a compromise with the 2001 NOSB task
18 force standards which ask for a four-mile
19 forage area. So, it's a lot smaller than
20 that.

21 It is an area which is consistent
22 with organic standards in Europe and in

1 Canada. I think it's a reasonable area.

2 There were questions about how do
3 you inspect an area that is that large? And
4 that's also a good question.

5 I think one of the great tools we
6 have right now is Google Earth. When you get
7 a satellite view of an area around an apiary,
8 you can see pretty easily what areas are wild
9 areas and what area is a cultivated area.
10 That's going to help an inspector and the
11 certifier a lot.

12 There's also hand-held GPS.
13 People can actually walk through the area.

14 I know there were comments by
15 Vermont Organic Farmers and NOFA Vermont which
16 were basically amendments to these
17 recommendations and they kind of questioned
18 the reasonableness of this 1.8 forage area.
19 They wanted to have two acre or less areas
20 within the forage areas which could be
21 considered non-organic production.

22 I'm not in favor of that.

1 Interestingly enough, I think most of the
2 organic beekeepers in the United States are
3 from Hawaii. We haven't heard anything from
4 Hawaii or organic farmers that they're
5 complaining about the 1.8 forage area. They
6 can handle that in Hawaii. This seems to be
7 only something in Vermont that's a problem.
8 It's not a problem in northern Wisconsin. It's
9 a problem in northern Minnesota or upper
10 peninsula Michigan.

11 I would also say it's a larger
12 question than that because it's really a
13 question of international trade. We're going
14 to be getting most of our organic honey is
15 going to be coming in from Mexico, from
16 Central America, from Argentina, Brazil, other
17 areas in South America. And I really think we
18 need strict standards to uphold the quality of
19 organic honey coming into this country.

20 Okay. There were other questions
21 from Vermont organic farmers about transition
22 time. They only wanted a 60-day transition

1 time. What they didn't look at was it's going
2 to take a full year for most beekeepers to
3 develop and draw out organic wax. And that
4 would be important. The wax tends to take in
5 chemicals and to have organic production I'd
6 like to see organic wax being used for the
7 development of bees and for holding honey.

8 They're also not wanting this
9 replacement bees to be limited to 25 percent
10 of all bees. The reason the replacement limit
11 is there is so that beekeepers can't just buy
12 bees, harvest the honey crop and then start
13 all over again with fresh bees again. We need
14 to -- organic people need to be developing
15 genetic stocks.

16 MR. GIACOMINI: Thank you.

17 Questions/comments?

18 Kevin.

19 MR. ENGELBERT: What are your
20 thoughts on using wax-coated plastic as a
21 foundation?

22 MR. BRIN: Yes, good question.

1 And, you know, as a beekeeper of course a
2 completely -- just a wax foundation, I think
3 is better in some ways. It's an incredibly
4 labor-intensive way to make frames. And I
5 don't -- for myself I don't even have time to
6 do that anymore.

7 I think it's a reasonable
8 alternative to use wax -- organic wax-coated
9 plastic frames and it is kind of a standard in
10 the industry.

11 MR. GIACOMINI: Question. Joe.

12 MR. DICKSON: Thank you, Aaron.

13 A commenter earlier today asked
14 that the standard be modified to not allow
15 split operations where organic and
16 conventional hives are in the same bee yard.
17 What are your thoughts on that?

18 MR. BRIN: Yes. We had discussed
19 that and I would agree with that. There is
20 drift between bee hives. Bees don't always go
21 back to their own hive. They get mixed up and
22 we never anticipated that an organic and a

1 conventional apiary could exist side by side.
2 If it's a split operation, I believe it should
3 be a separate aviary. Or they have to have
4 some kind of other plan which makes sense to
5 the certifier.

6 MR. DICKSON: Could an organic and
7 a non-organic apiary share a forage zone or a
8 surveillance zone or should they be completely
9 separate operations?

10 MR. BRIN: Again, I guess it would
11 be up to a certifier but I believe they could.
12 If there were two apiaries on two sides of the
13 forage zone, I don't see a problem with them
14 sharing the forage zone. It's a question of
15 them drifting from one hive that's like five
16 feet away from another hive. MR. DICKSON:
17 Do you have a relative distance on how far
18 apart you think they need to be?

19 MR. BRIN: That's a good question.
20 A lot of beekeepers try to hold drift down to
21 a minimum. You can paint hives different
22 colors. You can orient them in different

1 directions. So, they get used to
2 understanding knowing where their hive is.
3 We'd like them to go back to their hive, not
4 -- they cause trouble when they go back to
5 somebody else's hive.

6 So, if there's a plan, you know,
7 that makes sense to a certifier --

8 MR. GIACOMINI: Okay. That's
9 fine.

10 Any other questions?

11 All right. Thank you.

12 MR. BRIN: Thanks.

13 MR. GIACOMINI: Bill.

14 MR. ARDREY: Yes, sir.

15 MR. GIACOMINI: Okay. Bill, Ed
16 and Bruce Drinkman.

17 MR. ARDREY: And I do have a
18 PowerPoint presentation I'd like to go
19 through.

20 Thank you for allowing me to be
21 here today. I'm going to introduce you to
22 some new technology that should improve animal

1 welfare and help reduce or help improve animal
2 herd health.

3 Next slide please.

4 SmartStock developed an electronic
5 herd health monitoring device based on an
6 active RFID bolus for ruminant animals. If
7 you could pass that around this way.

8 It's a true animal ID that unlike
9 the Iratek cannot be removed. The bolus is
10 adjusted by the ruminants early and remains
11 with them for their life.

12 Once ingested, the bolus will
13 transmit their core body temperatures up to
14 300 feet to a network of receivers placed
15 around the pens, paddocks and barns. There is
16 no need to parade the animals past a panel
17 reader which in itself adds additional stress
18 and gives false temperature readings when the
19 bolus itself will last for five years.

20 Go ahead with the next one.

21 The temperatures are collected and
22 retransmitted by the receivers up to five

1 miles to a bay station and computer where the
2 information is available via the Internet. The
3 herd manager will immediately be alerted to
4 the majority of the dairy cow's disorders and
5 her physiological state including estrus and
6 parturition.

7 Oklahoma State University under
8 the direction of Dr. Robert Wittiman has
9 detected estrus in 100 percent of the test
10 cows with one false positive. There was an
11 average of eight to twelve hours notice to
12 allow for AI breeding. This is an example of
13 the estrus detection in the animals under test
14 at Oklahoma State University.

15 Go to the next one please.

16 This is an example of the data we
17 collected on parturition or calving of the
18 animals. There's approximately eight hours of
19 notice for the managers in case they need to
20 assist that cow during calving.

21 Next slide please.

22 Blind studies at multiple

1 universities have shown that there is a 24- to
2 72-hour advance notice before clinical signs
3 of an illness that cause a temperature spike
4 including most common curable disorders and
5 including epidemic outbreaks. This is an
6 animal -- one of the first trials we did. This
7 animal was in Omaha, Nebraska. I was in
8 Pawnee, Oklahoma, a couple hundred miles away.
9 I pulled this up on the Internet and I noticed
10 that this animal was about 105 degrees but you
11 can see the spikes where the animal is
12 drinking a lot of water and trying to cool
13 herself down. Eventually she gave up and
14 stopped drinking water and her temperature
15 went up to about 107. I called the manager
16 and asked him to take a look. He said there
17 were no clinical signs that that animal was
18 sick. He pulled her. Administered
19 antibiotics and within two days she was
20 healthy and back in the pens.

21 Okay. Next slide please.

22 This is some of the equipment that

1 we use. The bolus is in the center. It's
2 ingested into the animals. The animals then
3 transmit that information to a receiver that's
4 going out. The receivers are solar powered,
5 easy to install, and then they retransmit the
6 information up to five miles.

7 Major universities in the U.S. and
8 Canada have validated the system in finding no
9 less than 28 university -- no less than 28
10 advanced university degrees including master's
11 and PhD's were achieved on studies based on
12 this SmartStock system.

13 This graph that's up here now is
14 an indication of the potential cost savings.
15 Seven thousand head herd if we can reduce the
16 death loss by 50 percent we can potentially
17 save that herd manager \$7.5 million in a five-
18 year period.

19 Next slide please.

20 Something that's worth discussing.
21 We placed the system on a herd of 1,200 dairy
22 cows. The unexpected death loss due to

1 infection was around six percent. We hope to
2 reduce that to three percent. After 15 months
3 and even to our amazement, the dairy had lost
4 a total of two cows. That's not two cows a
5 month. That's a total of two cows. They were
6 heat-stress related and a manager was away
7 from the herd but the conditions were flagged
8 by the computer.

9 Medication costs were reduced by
10 50 percent and the hospital pens were
11 virtually empty. Mr. Jeff Beyers, the dairy
12 manager, said that we have saved him \$500,000
13 in one year.

14 With this system we have detected
15 mastitis, neuritis, other infections, estrus
16 calving and this product has been tested for
17 the last five years and studies continue, but
18 there is an opportunity for savings to the
19 organic dairy industry.

20 Okay. Thank you very much.

21 MR. GIACOMINI: Thank you.

22 Comments and questions.

1 Okay. I have one.

2 On one of the slides there do you
3 have an ear-tag version or just the bolus?

4 MR. ARDREY: We match it to an ear
5 tag.

6 MR. GIACOMINI: You match it to an
7 ear tag. Okay.

8 MR. ARDREY: The ear tag gives you
9 the visual indication. If the ear tag falls
10 off, we can still identify that animal with
11 the bolus. You cannot get that bolus out
12 without surgery.

13 MR. GIACOMINI: There's no ID with
14 the ear tag though other than visual?

15 MR. ARDREY: No ID other than
16 visual if the ear tag --

17 MR. GIACOMINI: No transmission?
18 Okay.

19 MR. ARDREY: No, sir.

20 MR. GIACOMINI: Okay.

21 MR. ARDREY: Just the bolus.

22 MR. GIACOMINI: Thank you. Any

1 other questions/comments?

2 Thank you.

3 MR. ARDREY: Thank you very much.

4 MR. GIACOMINI: Ed. Am I in the
5 right spot here? Yes. Ed Schaller. Is he
6 here?

7 Bruce Drinkman. Bruce. Ed.

8 MR. DRINKMAN: I'm Bruce.

9 MR. GIACOMINI: You're Bruce.

10 Okay.

11 George Bass with a proxy. Kelly
12 Shea.

13 Lisa, what is the note on John?

14 Can you explain that? Next one down after

15 Kelly. Or did I not get -- is he in that

16 slot? Okay. All right. Okay. Just trying

17 to keep it straight. No Ed. Okay.

18 Go ahead, Bruce.

19 MR. DRINKMAN: I was going to say

20 good morning, but I'll say good afternoon to

21 you folks.

22 My name is Bruce Drinkman. My

1 wife, Mary, and I operate a 50 cow organic
2 dairy in north central Wisconsin. We raise
3 our own crops for the entire operation.

4 I have three main areas of concern
5 that I want to address.

6 The stock charts, I have come up
7 with some answers in regard to that while I've
8 been down here today. I do feel that it's
9 very important though that you keep the
10 farmers in touch with any adjustments that
11 will be made. It's not going to be an
12 overnight fix for anybody that gets this
13 thrown at them.

14 Sometimes the rules are rather
15 confusing for us on the farm end. And, you
16 know, we try to keep in touch with the
17 certifiers but it's not always easy. The 50
18 square feet recommendation that I saw come up
19 I wasn't sure if that was going to apply to
20 tie stalls but I've been advised that that's
21 going to be exempted is my take on that.
22 And I think you need a little more guidance as

1 far as how that will be calculated in the
2 event it comes into play.

3 My second area of concern is the
4 origin of livestock. I believe that once an
5 operation has been certified the animals
6 should be brought in -- has been certified. No
7 outside animal should be brought onto the
8 operation unless they are certified
9 organically from another operation. And they
10 should be raised in the last stage of
11 gestation.

12 I also believe that transitioning
13 is a distinct one-time event. The conversion
14 provision should not be used to bring non-
15 organic animals into the operation on a
16 continuous rotation.

17 The third issue that comes to mind
18 for me and was brought to my attention is the
19 products listed for Sunset Review on the
20 205.603, synthetic substances. I hope that
21 those substances will be renewed as I use
22 several of them on the farm. And the one that

1 kind of tripped my trigger was sodium
2 hypochlorite. That's the chlorine I use to
3 sanitize my milking equipment which I need to
4 keep in compliance with Uncle Sam. So, you
5 know, we have to be very aware of issues on
6 that end of it.

7 And I know phosphoric acid was
8 another one that was thrown out and I've tried
9 other alternatives. I haven't come up with
10 any that works as well as these. I've looked
11 at other options in the past.

12 And the other thing as far as
13 chlorine in general goes, my wife is a
14 registered nurse for over 20 years. It's kind
15 of the standard in the health industry too to
16 use that. I mean, it's not like it's just
17 strictly for dairy farm use.

18 The other products on that list I
19 also see a similar situation. Aspirin is as
20 old as we are and then some so that shouldn't
21 be an issue. I strongly encourage you also to
22 do what you can to keep in touch with farmers

1 in general. I being a dairy farmer if you
2 have questions, feel free to contact us and
3 talk to us. Ask us what our thoughts are.
4 We're an honest lot. We'll try to tell you
5 where we're at with this stuff.

6 Thank you for your time.

7 MR. GIACOMINI: Questions,
8 comments?

9 Okay. Thank you.

10 MR. DRINKMAN: I have one thing.
11 Kevin, I've never met you, but I do thank you
12 for your time and input over the years.

13 MR. ENGELBERT: Thank you.

14 MR. GIACOMINI: Okay. Is Ed here?
15 Okay.

16 One second please. Ed's not here.
17 Is Richard next up? Okay.

18 Richard.

19 MR. MATTHEWS: Richard Matthews,
20 President of NLP Solutions, Incorporated
21 speaking on behalf of the Country Hen.

22 This week we have heard a lot

1 about access to the outdoors for poultry
2 including the call for enforcement by NLP.
3 For poultry, Miles and his team already have
4 reviews and investigations underway. I have
5 every confidence that he will vigorously
6 prosecute violations by producers and their
7 certifying agents.

8 I also have every confidence that
9 he will note any regulatory provisions needing
10 enhancement to facilitate enforcement. Should
11 he identify such needs, he will surely bring
12 the issues to the Board for its
13 recommendations.

14 Some speakers have called for the
15 NOP to enforce pasturing of poultry. NOP
16 can't do that. Why? Because no such
17 regulation exists. In fact, Section
18 205.239(a)(1) merely requires that animals
19 have access to the outdoors. It doesn't
20 define access to the outdoors. It doesn't
21 mention pasture, grass or for that matter
22 dirt.

1 This lack of detail is what led
2 the NOSB's May 2002 recommendation on access
3 to the outdoors and the NOP's acceptance of
4 that recommendation.

5 One of the things that I like and
6 admire about Katrina is her focus on reviewing
7 the history of past Board activities. And for
8 access to the outdoors, the record is rich in
9 history.

10 George Sieman was chair of the
11 Livestock Committee that crafted the NOSB's
12 May 2002 access to the outdoors
13 recommendation. Compare the final
14 recommendation to the original recommendation.
15 Read the May 2002 transcripts and you work
16 your way back through the record including the
17 comments. You will read discussion on AI and
18 other health, safety and well-being risks as
19 well as risk to water and the related
20 challenges imposed by state environmental
21 agencies.

22 You will see an evolution of the

1 recommendation based in compromise. You will
2 discover the origin of the NOSB's approval of
3 outdoor access areas consisting of concrete or
4 wood provided they are covered with scratch
5 materials. It's this record and the NOSB
6 recommendation that led to the NOP policy on
7 the acceptability of porches.

8 Porches are a compromise. Porches
9 address the risk to water quality issues faced
10 by some producers. Porches address the
11 health, safety and well-being issues raised by
12 producers. Porches take away the excuses for
13 not providing access to the outdoors. Porches
14 are an animal plant health inspection service
15 approved bio-security practice. Porches have
16 been an approved practice for eight years.

17 Producers who don't provide access
18 to the outdoors are in noncompliance.
19 Certifying agents that don't require access to
20 the outdoors are in noncompliance. Certifying
21 agents that prohibit porches are in
22 noncompliance.

1 The Country Hen uses porches to
2 comply with Massachusetts environmental
3 regulations. The Country Hen is and I
4 emphasize is in compliance with the NOP.

5 Dan, you raised the question to
6 George and I'd like to follow up on that.

7 You asked him what the floor of
8 the porch was made of. And he responded wood.
9 What didn't happen was the follow up question.
10 What's on that wood besides the hens and the
11 hen-processed food. The answer is shavings
12 for scratch material.

13 MR. GIACOMINI: Questions/
14 comments for Richard?

15 Kevin.

16 Richard, don't go away.

17 MR. ENGELBERT: Thank you. Does
18 the Country Hen or any other labeled egg
19 producer tout the benefits of their porches on
20 their advertising material or their cartons or
21 their websites?

22 MR. MATTHEWS: I can't speak for

1 all of the producers who use porches. But
2 George is very open on it. In fact, one of
3 his surveys asks the questions, how do you
4 feel about the use of porches?

5 MR. GIACOMINI: Further questions,
6 comments?

7 I'll tread into this a little bit
8 with you, Richard.

9 Would it be and I understand your
10 disposition on a number of these issues, so
11 I'm going to try to be selective on what I
12 ask.

13 Would it be appropriate for this
14 Board to look at the amount of access into the
15 porch and the size of the porch as an
16 appropriate consideration to animal welfare
17 under your understanding and interpretation of
18 what the regulations are? Would those be
19 appropriate?

20 MR. MATTHEWS: Most definitely.

21 MR. GIACOMINI: Okay.

22 MR. MATTHEWS: I think that you

1 would find that George Bass is more than
2 willing to do anything that you find necessary
3 with regard to the porches. If you wanted him
4 to expand the porches he would. If you said
5 that the opening wasn't big enough, he'd make
6 the opening big enough. And I think that it's
7 really vital that the openings be big enough
8 and that there be reasonable space. Not
9 everyone has enough space, even though those
10 that do use porches.

11 MR. GIACOMINI: Right.

12 MR. MATTHEWS: So, there's work to
13 be done in the area of porches as well, but my
14 emphasis is that it's a compromise position.
15 It's something -- we saw it in the dairy
16 pasture rule. Where in California there's
17 areas where the animals can't be on pasture
18 during certain times of the year because of
19 the environmental regulations. And that's the
20 same thing that some of these producers are
21 facing is environmental regulations. As
22 George mentioned, he's in a watershed for the

1 water supply for the City of Boston. And
2 there's restrictions on him as to allow those
3 birds out onto the ground.

4 So, instead of just keeping them
5 in the hen house, he went the extra mile to
6 find the compromise position and I think
7 that's what all producers should be doing
8 where they have concerns. Go the extra mile.

9 MR. GIACOMINI: I think though it
10 does need to be recognized that as you use the
11 example of dairy. You could use the analogy
12 that that porch is, except for the chicken
13 wire on the side, that porch could be viewed
14 as very similar to a pole barn. A pole barn
15 whether it's open housing, whether it's free
16 stall barns, whatever, on a dairy. I don't
17 know of anybody that would find that pole barn
18 as acceptable to access to the outdoors.

19 MR. MATTHEWS: I'll put it this
20 way. When there is a thunderstorm outside and
21 I want to get outside to enjoy the light show,
22 and enjoy the sounds of nature, I'm outside

1 when I go out on my porch. The only
2 difference is I'm not getting wet. But I am
3 outside.

4 MR. GIACOMINI: Kevin.

5 MR. ENGELBERT: Richard, how do
6 you respond? I mean, you've been here since
7 Monday morning and we've heard poultry farmers
8 come up here and say that they provide what I
9 would consider to be true access to the
10 outdoors with pasture and scratching dirt and,
11 you know, no wire, no boards under their feet.
12 And they say it can be done. They're doing it
13 and there's -- anybody who doesn't do it is
14 simply making excuses. How do we respond to
15 those farmers that have come up here and given
16 testimony to that effect?

17 MR. MATTHEWS: The thing that you
18 have to consider is the regional differences.
19 This whole rule is based on consideration of
20 regional differences. I mean, the pasture
21 rule was a great example of what we went
22 through with regard to that. There are areas

1 where the risk of bio-security through AI are
2 higher than other places. So, there's some
3 legitimate concerns by the producers.

4 There are areas where the hen
5 houses were located long before the NOP went
6 into place. And there's environmental issues
7 in those areas. And so the Board in past
8 history has taken all of that into
9 consideration and they have worked diligently
10 to find the compromises.

11 Now, I'll grant you, the testimony
12 from 2002 didn't mention porches, but it is a
13 natural extension once you've got the approval
14 to have wood surfaces and you've got the
15 approval for concrete surfaces. And there's
16 a whole history as to why they went to that as
17 an approved practice.

18 And so, yes, Kevin, in an ideal
19 world where everyone is the same and all areas
20 are the same, maybe you could have a
21 requirement that every bird be out on pasture.
22 But we don't have the ideal situation. We

1 don't have the perfect world. We have
2 regional differences. We have environmental
3 differences, but we have one worldwide
4 standard.

5 MR. GIACOMINI: But the new
6 pasture rule specifically states if an area
7 can't meet the 3120, it's likely just an area
8 that you can't be an organic dairy.

9 MR. MATTHEWS: That's true, but
10 there's all kinds of provisions in there that
11 enable somebody to meet it.

12 MR. GIACOMINI: Okay.

13 MR. MATTHEWS: I mean, there's
14 intensive grazing, there's irrigation of the
15 fields, there's additional pasture land. I
16 mean, there's all kinds of examples within
17 those regulations where you can get up to the
18 30 percent.

19 And the 120, that's the minimum
20 and there's no place in the geographical
21 United States or very few places in the
22 geographical United States, contiguous states,

1 where you would see where you couldn't get 120
2 days. I mean, it was selected because of the
3 average is like 120 days. That's why it was
4 the minimal number.

5 MR. GIACOMINI: Okay. Anything
6 else for Richard?

7 Kelly, you are just so ready, I
8 think we'll let you go ahead but we'll break
9 for lunch after this.

10 MS. SHEA: It's up to you, Mr.
11 Chair, whichever one you want. It's up to the
12 Board.

13 MR. GIACOMINI: Let's go ahead.
14 Hopefully, we won't drag out questions too
15 badly. I know you won't go over. But we are
16 an hour and a half behind.

17 MS. SHEA: Well, with that in
18 mind, I'll speak swiftly.

19 So, good morning to everyone. I
20 really want to thank everybody on the Board
21 for all the efforts the last couple days. You
22 are stuck to your chair. We can wander out in

1 the hallways so when my butt gets sore and I
2 want to complain I think of you.

3 And a lot of mud leading up to the
4 meeting, so I've heard a number of comments
5 from you guys about workload and challenges
6 with gathering information. And so I would
7 really urge the Board Members to reach out to
8 individual members of the community and to
9 organizations like the OTA, NODPA and its
10 sister organizations, OMRI, the National
11 Organic Coalition just to name a few. We'd be
12 more than pleased to be arms and legs for the
13 Board.

14 We can mobilize our colleagues
15 together. Data for the Board. I do know of
16 two Board Members that reached out to OTA. The
17 Trade Association organized conference calls
18 so the Board Members could present their draft
19 recommendations and gather feedback. It was
20 an excellent process. And it serves the dual
21 purpose of both strengthening the
22 recommendation for the Board Member and

1 informing the public.

2 You know, there were only 16
3 business days for people to absorb over 180
4 pages of very important information that could
5 lead to regulatory changes. The Board's own
6 policy manual says although not required by
7 FACA, the Board strives to post a provisional
8 agenda, et cetera, et cetera, and they talk
9 about no later than 90 days before the meeting
10 is scheduled to begin and then a final agenda
11 no later than 45 days and Federal Register no
12 later than 45 days.

13 So, I don't want to be critical.
14 I'm just pointing out that because public
15 input is so crucial and because it's really
16 difficult to get all the documents out to the
17 public, you know, 45 or 90 days ahead of time,
18 that it's even more important that the Board
19 begin to engage their colleagues in the
20 organic community as the work is being done.
21 So, if this happens, I think the Board
22 deliberations will be much more informed.

1 As to the Made With
2 recommendation. Since this was a request from
3 NOP staff that are no longer at the program,
4 and since the current NOP staff are already
5 working on this project, I would just suggest
6 that the committee volunteer to withdraw its
7 document.

8 Yesterday I was pretty concerned
9 to hear a Board Member say that we should get
10 rid of the 100 percent category. That would
11 not be good. Hundred percent ingredients are
12 really critical in ingredient percentage
13 calculations. What we need is clarification,
14 not elimination.

15 A great area of clarification
16 needed is in washing or cleaning of surfaces
17 where agricultural products are handled. I
18 mean is raw milk from a farm not 100 percent
19 organic because the farmer needed to wash his
20 milk equipment?

21 The 238 recommendation that you
22 worked on. It's really a good start and I

1 have no problems with you guys passing that
2 but I think it needs to go a little further.

3 See, the National List for
4 livestock is broken into categories ostensibly
5 by use. But use crosses categories. For
6 example, minerals and vitamins are used for
7 health care, not only as feed additives. So,
8 as the NOP very appropriately pressures
9 certifiers for consistency, certifiers are now
10 reading the regulations and the National List
11 with a more restrictive eye which is great.
12 So, this will lead to some decisions that
13 maybe have been made in the past using common
14 sense, being made using a black and white
15 lens. And that's not bad. But I think it can
16 have unintended consequences in areas where
17 the regulations were, you know, were imperfect
18 when they were written.

19 So, give a little thought to that
20 and Dr. Pierman is going to be speaking as
21 well and maybe he can elaborate on that a
22 little bit more.

1 Silicon dioxide, so I just learned
2 at this meeting about the petition to de-list
3 silicon dioxide. And this is a really
4 important material for use in anti-foam. So,
5 silicon dioxide is actually an ingredient in
6 the certified anti-foams that are in use
7 today.

8 So, I just don't know if kind of
9 just a whiff of an alternative, you know,
10 should cause the Board not to relist the
11 material currently in use. So, I think the
12 community really hasn't had time to adequately
13 comment on alternatives or research
14 alternatives.

15 Cleansers and sanitizers,
16 chlorine, phosphoric acid, others. Farmers
17 and processors already have so few options for
18 sanitization and food safety. I really liked
19 Jay's comments on the issue. And so I would
20 suggest that, you know, some more work can be
21 done to make sure we have the right materials
22 on the list but I don't think we can do that

1 work before the Board's vote tomorrow. So, we
2 would like to see those relisted.

3 And in closing, just really a
4 heart-felt thanks to Kevin and the Board and
5 as he always says his two sons. To Dan
6 Giacomini, Jennifer Hall, Jeff Moyer, Joe
7 Smillie. Thank you for five years of service
8 to the community. It's really appreciated.

9 MR. GIACOMINI: Joe.

10 MR. SMILLIE: Well, yes, that was
11 enough.

12 One issue that I want to get
13 clarification on. One I don't think a lot of
14 people understand. They could be wrong, is
15 the 100 percent.

16 There's two different things we're
17 talking about, Kelly, and I think you know but
18 just to be sure. There's 100 percent claim.
19 That's a claim that you can make that your
20 product is 100 percent. That claim also
21 includes the fact that you cannot use any non-
22 organic processing aids.

1 For example, nitrogen-flushed
2 coffee cannot currently make the claim 100
3 percent coffee on a package that says it was
4 flushed with nitrogen. However when that
5 coffee goes into a coffee cake, you can use
6 the 100 percent as the calculation formula. It
7 is 100 percent. Whether they'd be allowed to
8 put 100 percent organic ingredients on the
9 package without making the 100 percent claim,
10 I don't know. I'll leave that to the wisdom
11 of the program.

12 But in our talking about trying to
13 allow nitrogen-flushing back to the old
14 inerts, you know, fiasco, that was the point
15 we were trying to make is to get across is
16 that we believe that, you know, processing
17 aids like nitrogen that shouldn't prevent the
18 100 percent claim. But, again, it doesn't
19 prevent counting it as a calculation on the
20 100 percent.

21 MS. SHEA: I do understand that.
22 It's not well understood --

1 MR. SMILLIE: Right.

2 MS. SHEA: -- policy.

3 MR. SMILLIE: Agreed. I certainly
4 agree. We meet it every day as a
5 certification agent.

6 MR. GIACOMINI: Kevin.

7 MR. ENGELBERT: Very briefly.

8 Thank you very much for the warm
9 wishes. But it's three sons, not two. And I
10 don't know if I would be here if it was only
11 two sons.

12 MS. SHEA: Don't tell any of them
13 that I left them out. Okay? I'll get your
14 wife on that as well.

15 MR. GIACOMINI: Further comments
16 or questions?

17 Okay. Steve.

18 MR. DeMURI: Just thought of one.

19 You had an opinion on the silicon
20 dioxide. What about the glycerides for
21 sunset?

22 MS. SHEA: I have no relationship

1 with glycerides.

2 MR. GIACOMINI: That's on the
3 record.

4 MS. SHEA: Seems I brought some
5 mirth to the room today.

6 MR. GIACOMINI: Okay. Thank you.
7 Any announcements before we break
8 for lunch?

9 I have just before 45. One hour,
10 we'll start at 1:45 again.

11 Please be prompt.

12 Thank you.

13 (Whereupon, the above-entitled
14 matter went off the record at 12:44 p.m. and
15 resumed at 1:45 p.m.)

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1 A-F-T-E-R-N-O-O-N S-E-S-S-I-O-N

2 1:52 p.m.

3 MR. GIACOMINI: The Board please
4 find their seats, we're getting ready to
5 start. Any conversations, please move them to
6 the hallway. Please. We're going to be going
7 with Jon, Susan and Steven Frenkel.

8 Any announcements or anything we
9 need to do, Lisa, before we proceed?

10 MS. BRINES: No.

11 MR. GIACOMINI: Okay. Programming
12 thing, are we on with sound? Okay, thumbs up
13 from sound. Okay.

14 Jon? Okay, go ahead.

15 MR. CADOUX: Thanks for your time,
16 guys. I will be very direct and quick.

17 I'm Jon, the founder and president
18 of Peak Organic Brewing Company. We're one of
19 very, very few brewing companies in the world
20 that strictly do organic beer. So organic is
21 not a line extension for us, it's not ten
22 percent of our volume, it's not twenty

1 percent, it's 100 percent. Every single ounce
2 of beer we've ever brewed is certified
3 organic.

4 We support the Handling
5 Committee's recommendations to take hops off
6 the list in January 2013, and we think it's a
7 real win/win for organic beer, organic
8 brewers, like us, organic growers and also the
9 consumer. We also think, especially me, I
10 think it's a big win for 606, to be honest,
11 too. Over the next few years, just our
12 company, Peak, will support and purchase, you
13 know, untold thousands of pounds of organic
14 hops, quite literally millions of pounds of
15 organic grains, malted barley. And were it
16 not for 606, I frankly don't know if we'd be
17 around to purchase a single pound. And so I
18 think that's a lot, and we're really looking
19 forward to January of 2013.

20 MR. GIACOMINI: Questions and
21 comments?

22 Kevin?

1 MR. ENGELBERT: So do you mean to
2 say that you think that hops had never been
3 put on 606 and always been required to be
4 organic, that there would be no such thing as
5 organic beer right now?

6 MR. FOSTER: It's hard to say for
7 sure, but if I had to bet, I would bet against
8 it. I don't think I'd be around. I don't
9 think we would have survived.

10 MR. GIACOMINI: Other questions,
11 comments?

12 Joe?

13 MR. SMILLIE: Just a comment,
14 because we were challenged by the program to
15 prove, in dollars and cents and actual facts
16 and terms and pounds and acres, that 606 spurs
17 organic growth. So as Miles now knows, it's
18 in the testimony, we have some figures to
19 start with, and I'm convinced there will be
20 more.

21 MR. GIACOMINI: Love that sample
22 size, but that's okay. I'm a scientist.

1 Jon, I just have a question for
2 you. I'm ideal with, you know, harvest
3 seasons and crop years, with the crop years
4 the time you need to go between harvests. And
5 this seems right in the middle of your crop
6 year. Granted you have big times of brewing
7 and lax times of brewing, you know, you're
8 getting through all the holiday season. Is
9 this the right date?

10 MR. CADOUX: It's the right date
11 because this is based on the 2012 harvest,
12 which will be in roughly the September,
13 October time frame. However, hops go through
14 a multi-month processing phase that brings us
15 to January. So by January, we believe that
16 the 2012 hop harvest will be fully processed
17 and ready for purchasing.

18 MR. GIACOMINI: So even though you
19 have the September, October is the harvest, it
20 doesn't really come into the market -- it's
21 not in the pipeline until January?

22 MR. CADOUX: That's exactly right.

1 MR. GIACOMINI: All right, that
2 makes sense, thank you. I'm fine now.

3 Any more questions? Comments?
4 Okay, thank you.

5 Okay, Susan Cheney, Steven Frenkel
6 and Dragan.

7 MS. CHENEY: Hello, Susan Cheney
8 with Martek Biosciences.

9 I would like to thank the Board
10 for the opportunity to voice our support for
11 the Handling Committee's efforts to fully
12 review the historical, scientific and legal
13 requirements regarding the supplementation of
14 Organic Certified Products. The 1995 proposed
15 annotation regarding vitamins and minerals
16 remains a valid and integral part of the
17 authorization for responsible supplementation
18 of organic products and should be revalidated
19 and incorporated into the National List as
20 originally recommended by the 1995 NOSB.

21 Organic food products should have
22 access to the same science-based nutritional

1 ingredients that may appear in conventional
2 products, subject to standard National List
3 procedures. Consumers of organic products
4 should be allowed to choose appropriately
5 enriched organic products and not be forced to
6 purchase conventional foods due to the lack of
7 availability of enriched products in organic
8 form. The clearest path to this outcome would
9 be to revisit the existing annotations for
10 vitamins and minerals and correct it to
11 reflect the original NOSB recommendation.

12 Lastly, in response to the
13 unfounded allegations made against my company
14 this morning, I would like to say that Martek
15 and its customers stand by the strong safety
16 record of our ingredients and the health
17 benefits that they provide.

18 Thank you.

19 MR. GIACOMINI: Questions and
20 comments?

21 Joe?

22 MR. SMILLIE: Same question I

1 asked last time. Do you absolutely need
2 hexane in order to extract DHA and AHA from
3 ALGO sources?

4 MS. CHENEY: From one of the ALGO
5 sources right now, the answer is yes. From
6 one of the ALGO sources we currently have, we
7 do not use it. The ARA is a fungal source,
8 just to correct that --

9 MR. SMILLIE: Oh, I'm sorry.

10 MS. CHENEY: -- and that also
11 requires hexane at this point in time.

12 MR. SMILLIE: Do you believe it's
13 possible in the future to have AHA and DHA
14 available --

15 MS. CHENEY: I do believe --

16 MR. SMILLIE: -- without hexane in
17 this fashion?

18 MS. CHENEY: I do believe the
19 science will catch up eventually. The science
20 isn't there now, or the technology isn't there
21 now. It's not something that's not being
22 looked at, I can assure you of that. The

1 technology's just not there.

2 MR. GIACOMINI: Question --
3 further questions or comments?

4 MR. DeMURI: Although the
5 technology isn't there at this date, is this
6 something that you folks or suppliers are
7 working on currently?

8 MS. CHENEY: I can say we are
9 working on it, and I am bribing my team on a
10 regular basis.

11 (Laughter.)

12 MR. GIACOMINI: Okay. All right,
13 I think that's it. Thank you.

14 Where's my screen -- Steven
15 Frenkel, Dragan --

16 MS. BRINES: Jim Goodman.

17 MR. GIACOMINI: Jim Goodman, I
18 don't have that one. Okay. What else is --
19 okay, he just slipped in and moved down.
20 Okay. Jim Goodman.

21 MR. GOODMAN: Yes, thank you for
22 allowing me to slip in. My cows need me so I

1 have to get home to milk, too. Thirty years
2 I've been trying to make them get along
3 without me but they haven't got to that yet.

4 I'm an organic dairy farmer. I
5 don't -- and we also do direct marketing here
6 at the Farmer's Market in Madison, we sell
7 beef and cheese. I'm not specifically a
8 poultry grower but I have some comments
9 related to that. We've been through a few
10 years struggling over a pasture rule, what
11 defines access to pasture, dry matter cause
12 need, and I think this relates pretty well to
13 some of the discussions you've been having on
14 poultry.

15 Selling at the Farmer's Market,
16 you deal directly with customers and they have
17 certain expectations and assumptions about
18 what organic means. And I think if we could
19 sell eggs, if we raised chickens, if we sold
20 eggs, we could get rich because people want to
21 buy organic eggs. They want to know how
22 they're raised.

1 And we've heard a lot of comments
2 about how these chickens in these large
3 thousand and multi-thousand bird houses are
4 happy. And I guess I've always wondered if
5 they're so happy, why don't we see pictures of
6 thousands of chickens in the barn on the egg
7 cartons instead of the chicken laying in the
8 grass? It seems to me that people want to buy
9 eggs from poultry that has access to pasture
10 where they can do their natural activity and
11 be the omnivores that they're designed to be.
12 And that's what the industry sells eggs as.

13 You never see a large multi-
14 thousand chicken poultry farm on an egg crate.
15 You never see a confined dairy on a milk
16 carton. It's always a happy cow next to a
17 little red barn or a chicken laying in the
18 grass. As was mentioned, poultry are
19 omnivores. If they have access to the
20 outdoors, to pasture, to grass, to bugs, they
21 can supply their dietary needs.

22 It seems that many of the

1 solutions people have proposed to getting by
2 the rules and fitting them into their large-
3 scale productions are just that, a way to fit
4 rules into a production model that they know
5 is very profitable. And I don't necessarily
6 think that's the mission of the organic
7 program or the NOSB. If you want to make
8 profit in a conventional system, sell
9 conventional poultry, sell conventional eggs.

10 Another thing I wanted to briefly
11 address was nanotechnology, which I assume has
12 been discussed in the last couple days but I
13 haven't heard much mention today. I think
14 nanotechnology is one of those things that
15 needs to be included with the big forbidden
16 parts of organic; GMOs, sewage sludge. I just
17 really don't see any need, I don't see any
18 benefit to farmers, I don't see much benefit
19 to consumers. I looked up a few things on
20 nanotechnology, some of the products that
21 they're making. One is a nutritional drink
22 with nano particles of iron. Safety testing

1 on nanotechnology is not really done, it's not
2 required. The theory with the small particles
3 of iron that are passed through cell
4 membranes, they're more bio-available, how do
5 we know that children drinking maybe more of
6 this chocolate drink than they should aren't
7 getting too much iron in a day? Iron can be
8 toxic.

9 Adhesive for McDonald's hamburger
10 containers, I guess, well, that's really nice.
11 But I don't think we need to worry that much
12 about McDonald's in organic at this point.
13 Nano-silver particles as disinfectants in
14 cutting boards and tools, that's another thing
15 that fits into large-scale production, you
16 know, we've gotten by fine with soap and water
17 for many years to keep things clean.

18 One needs to look at the list of
19 companies that already have nano products and
20 production. Altria, which is Kraft, BASF,
21 Bayer, Cadbury, Cargill, DuPont. These are
22 not organic companies. This is a technology

1 that's being developed for the conventional
2 industry and I really don't think it has any
3 place in organic. I would again urge you to
4 put that on the top of the list with GMOs and
5 sewage sludge as things strictly denied to
6 organic.

7 Joan Gussow who was a member of
8 this board quite a few years ago, and this is
9 just a short quote from her. She observed
10 that, while sustainable agriculture cannot be
11 defined, organic agriculture is being defined.
12 And it's definition is being rendered
13 serviceable to an existing agri-food industry.
14 And I think nanotechnology is a great example
15 of that; large-scale confinement, livestock
16 operations are a great example. People have,
17 for years, wanted to create a parallel
18 industry and create the organic Twinkie, which
19 maybe is already out there. I don't know.

20 But I don't think that we need to
21 be going that way. I don't think that's what
22 people who buy organic food expect, I don't

1 think that's what they'd want. I don't think
2 we should allow huge corporate interests to
3 bend the rules to fit their standards of
4 production when these rules should be in place
5 to keep farmers in business and keep consumers
6 with a safe product.

7 Thank you.

8 MR. GIACOMINI: Questions and
9 comments?

10 (No response.)

11 MR. GIACOMINI: Okay, you're done.
12 Thank you. If you can figure out that once-a-
13 day cow and weekends off, let us know.

14 Steven and Dragan -- I hope I'm
15 getting that right -- and Christopher Ely in
16 the hall. Go ahead.

17 MR. FRENKEL: Hello, I'm Steve
18 Frenkel.

19 As the owner of Organic Vintages,
20 a licensed distributor of organic wines, and
21 wines made with organically-grown grapes in
22 the states of New York, New Jersey and

1 Connecticut, I would like to offer my comments
2 regarding the recent petition for a change in
3 the NOP regulations to permit wines made with
4 100 percent organically-grown grapes with
5 sulfites added to be labeled as organic wine.
6 I am emphatically opposed to such a change.

7 I have been supplying wines to
8 stores and restaurants in the New York
9 Metropolitan area and the Tri-State region for
10 22 years. And by the way, one of the first to
11 win at the organic wine distribution business
12 way back. Currently representing more than 35
13 wineries, some producing USDA organic wines
14 and others producing wines made from
15 organically-grown grapes.

16 I feel exceptionally fortunate to
17 be able to provide the fine wines from these
18 producers in the marketplace, and am grateful
19 to all the purveyors we work with. I, our
20 sales team and our office staff have developed
21 good relationships with our customers and have
22 also been in direct contact with consumers on

1 a regular basis. Invariably, we find that all
2 concerned, consumers and retailers, prefer
3 clear, honest, forthright labeling.

4 In response to the issues raised
5 in the petition and based on my many years of
6 personal experience, I believe that the
7 majority of our retailers and their customers
8 desire that only a wine made with 100 percent
9 organically-grown grapes, with no added
10 sulfites, should be labeled as organic wine.

11 I am also of the opinion that wine made with
12 100 percent organically-grown grapes, with
13 added sulfites, should continue to be labeled,
14 made with organically-grown grapes, contains
15 sulfites, or better yet, should be allowed to
16 state, if made this way, made with 100 percent
17 organically-grown grapes, contains sulfites,
18 but not carry the organic wine description.

19 Wine made with 70 percent organically-grown
20 grapes should be labeled, "Made with 70
21 percent organically-grown grapes", or
22 "Contains 70 percent organically-grown

1 grapes".

2 Sulfites in the high
3 concentrations of around 100 parts per million
4 act as an allergen to many people, and
5 therefore would be a significant disservice to
6 provide the USDA logo and organic wine
7 statement that could mislead the consumer into
8 assuming they are purchasing a pure, non-
9 allergenic beverage. Many of our retailers
10 carry only wines that state organic wine and
11 have the USDA organic logo since they have
12 found that their customers, in most cases, are
13 more inclined to want a wine that is made with
14 organically-grown grapes and also without
15 sulfites. Other retailers carry both and find
16 that since they can be distinguished easily,
17 their customers are able to choose according
18 to individual preferences.

19 However, if a rule changed that
20 allowed wines made with organically-grown
21 grapes and added sulfites to be labeled
22 "organic wine" is implemented, retailers and

1 their customers would be more easily confused,
2 even fooled into thinking an organic wine they
3 have purchased doesn't contain sulfites. I
4 also don't think it is in the best interest of
5 the consuming public to be potentially misled,
6 even if it is beneficial to the growth of the
7 organic wine industry.

8 My business has grown
9 exponentially over many years, and only has
10 leveled out recently due to the current
11 economic climate. I do think that our
12 industry will continue to have steady,
13 continued growth and interest in all things
14 organic will remain strong, especially if we
15 adhere to careful, truthful labeling and
16 maintain the integrity of the organic
17 standards as already established. To now clog
18 the labeling standards with potentially vague
19 or unclear messages could endanger the
20 longstanding trust of the organic consumer.

21 MR. GIACOMINI: Questions and
22 comments?

1 (No response.)

2 MR. GIACOMINI: Thank you.

3 Dragan, Christopher Ely and Mark
4 McKay. Go ahead.

5 MR. MARCURA: My name is Dragan
6 Marcura, I am the founder and the chief
7 science officer of AgroThrive, Incorporated.
8 And like Tina yesterday, I accept all
9 responsibilities for all things associated
10 with CSL because it was my application that
11 initiated the discussions and I'm still living
12 the consequences.

13 So first of all, thank you for all
14 the hard work that you've done on that, and
15 I'd like to get into some of the -- my -- we
16 handed out two handouts. One of them is the
17 detailed summary of why we don't think it
18 should be synthetic and the other one is --
19 and you can read this at your leisure -- the
20 other one is excerpts from the only research
21 study that has been published on this
22 particular topic, the question of whether

1 sulfur dioxide breaks disulfide bonds in
2 steeped corn. And so I will be referring to
3 some of these details in the second handout,
4 the one that has the graph in front of it.
5 The second page of that handout has the
6 process.

7 This is the steeping process of
8 the counter current steeping kind, which is
9 the only process that is being used for steep
10 liquor that my company and Converter Organics
11 uses. There is -- this was -- this graph was
12 made up from the visit that I personally did
13 to Corn Products International in Stockton and
14 you have detailed description -- the page
15 following, detailed description, step by step.
16 Let me just go through a couple of very
17 important aspects of this process, which seems
18 to be lost in this whole discussion.

19 As you can see there, we have 12
20 different circles that represent large
21 stainless-steel tanks, each one of them called
22 steeps. And you see, we have steeps going

1 from number one through number twelve, and
2 it's a continuous process. The reason it's
3 called counter-current is that the corn goes
4 into the number one, for the process to start
5 it goes into the number one tank and the
6 sulfur dioxide, the sulfurous acid goes into
7 the last steep, number twelve, when it's added
8 in fresh form.

9 What happens during the process,
10 the corn is -- each tank is filled with 37,500
11 pounds of corn, and it's also steeped in the
12 oldest steep liquor. The oldest steep liquor
13 meaning that it has the lowest amount of
14 sulfur dioxide and the highest amount of --
15 the highest amount of lactic acid. At the
16 same time as the -- where's the button, oh,
17 here's the button. Okay. At the same time as
18 the corn is being added to the -- to steep
19 number one, the oldest steep liquor is added
20 on top of it and at that point, we have a
21 very, very active lactic acid fermentation
22 going on. Lactobacilii -- it's dominated by

1 lactobacilii and lactobacilii are known to
2 convert sugars starches to lactic acid and
3 also they are known to hydrolyze proteins.
4 They're normally used in culture dairy
5 products such as yogurt, such as cheeses, that
6 ripen cheeses because of their percolative
7 ability. They also digest milk, for example,
8 in culture dairy products.

9 So the process, the steep liquor
10 is moved down the process and the oldest corn
11 receives the -- receives the new sulfur
12 dioxide and is then immediately taken to
13 grinding. So that by the time the steep
14 liquor reaches steeps one and two or three,
15 the sulphur dioxide is very low and it's the
16 lactic acid fermentation and the hydrolytic
17 power of the microbes that breaks the proteins
18 or releases of the starch.

19 That is in opposition -- if I can
20 just --

21 MR. GIACOMINI: How much longer do
22 you think you have?

1 MR. MARCURA: Just a minute.

2 MR. GIACOMINI: Okay. Let's be
3 quick, this is my understanding this would
4 help.

5 MR. MARCURA: Okay, yes. Next
6 slide, please.

7 Okay, this slide here shows what
8 happens in the methodology, which is what a
9 lot of the people have been discussing. This
10 is a lab -- bring it up, please, so you can
11 see the caption underneath. This is the
12 laboratory setup situation, the model system
13 where the -- where there is no lactic acid
14 fermentation and where sulfur dioxide is added
15 every five hours to keep the concentration of
16 sulfur dioxide in the process -- can you
17 please bring it down -- keep the concentration
18 in the process at its maximum level.

19 So this is where the big
20 difference is. In order for the sulfur
21 dioxide to get into the corn and actually do
22 any -- cause any chemical change, it has to be

1 in a very, very high concentration at the
2 beginning, at the -- which is not the case in
3 the steeping process, counter-current steeping
4 process.

5 I'll leave it at that for some
6 questions if --

7 MR. GIACOMINI: Okay. Questions,
8 comments? Joe?

9 MR. SMILLIE: Yes, I need you to
10 walk us through a little bit more.

11 MR. MARCURA: Yes.

12 MR. SMILLIE: What is the active
13 form of the sulfurous acid that's capable of
14 breaking the disulfide bonds?

15 MR. MARCURA: Okay. The -- we
16 have a slide, I think it's number five,
17 please.

18 This slide here shows the
19 association chemistry of sulfurous acid. And
20 it's all -- whether there's a possibility of
21 the disulfide bond breakage or not depends on
22 this association chemistry. The only moiety

1 that is capable of breaking disulfide bonds is
2 the SO₃ minus 2 moiety. The -- all the other
3 versions of the SO₂, which is sulfurous acid,
4 are incapable of breaking disulfide bonds. So
5 this is only available at the pH of about 7.
6 At the pH of about 7, pK 2 of 6.99 means that
7 at that pH, those two versions are at
8 equilibrium.

9 And as we go in this direction,
10 we're losing the concentration of the active
11 form of sulfur dioxide that is available at
12 the active site in the solution.

13 MR. SMILLIE: So it's the new
14 sulfur goes into the old corn?

15 MR. MARCURA: Yes.

16 MR. SMILLIE: And what's the pH
17 when the --

18 MR. MARCURA: The pH --

19 MR. SMILLIE: -- sulfurous acid is
20 at?

21 MR. MARCURA: Yes. The pH of the
22 corn, by the time the corn reaches the last

1 steep or the last -- by the time it will enter
2 the last steep is about four. So the -- in
3 order for any activity, any disulfide bonds to
4 be broken, we have to have this moiety. And
5 at pH four, you can see that from seven to
6 four, there is a large difference in pH. And
7 when you look at the concentrations of these
8 two moieties, you will -- some of the chemists
9 in the room will probably agree that, at the
10 pH of four, which is where the corn is when
11 sulfur dioxide is added, the concentration of
12 this moiety is -- compared to this moiety, is
13 about one in 1,000 versus 999 in 1,000.

14 So at this level, at this level,
15 we have very little chance of the active form
16 of sulfur dioxide being present in the system.

17 MR. SMILLIE: Yes, well, learning
18 my chemistry year by year.

19 In your opinion then, just to sum
20 it up, is it a chemical change? Is it
21 splitting a covalent bond?

22 MR. MARCURA: For this process, in

1 addition to the concentration of the active
2 moiety being very low at the active site, we
3 also have the lowest concentration of sulfur
4 dioxide inside the liquid. So if we do the
5 proportionate analysis of how much of SO₃
6 minus two is present at the active site, when
7 sulfur dioxide is added, we find that, even
8 though those sulfur dioxide is approximately
9 100 parts per million, we are one-tenth of
10 that -- of a percent possibility of SO₂ minus
11 three being present at that point, which ends
12 up being one-tenth of a parts per million --
13 one-tenth of a parts per million versus 99.9
14 parts per million of the inactive form.

15 So you know, anybody that's a
16 betting person or an individual of proportions
17 or at least -- would realize that the, not
18 only is the chemistry inside the steeping
19 process against this -- the possibility of
20 this reaction taking place for this particular
21 process, but the particular concentration of
22 the active moiety is miniscule at best.

1 So in my opinion, no possibility
2 of the disulfide bonds being broken by sulfur
3 dioxide in this particular process.

4 MR. GIACOMINI: Joe?

5 MR. SMILLIE: Is this process a
6 standard corn wet milling process?

7 MR. MARCURA: This is what's been
8 practiced by, as far as I know, all of the
9 steep -- at least the corn refineries and the
10 producers of corn steep liquor that's being
11 used in fermentation in liquid fertilizers.

12 MR. SMILLIE: So if all this data
13 is correct, the lactic acid fermentation
14 process --

15 MR. DARCURA: No, no. Not
16 necessarily the lactic acid but the digestive
17 capability of lactic microbes, lactobacilii,
18 same as they ripen cheese, same as they
19 hydrolyze dairy protein, for example, the milk
20 proteins. They are most likely digesting the
21 protein that's encapsulating the starch in
22 this particular process.

1 And further evidence to that is
2 that there are free amino acids in the
3 analysis of steep liquor, there is the
4 vitamins, B vitamins are produced in fair
5 amount, fair quantities, none of which are
6 components of corn but it's actually the
7 microbes that are producing.

8 MR. GIACOMINI: Anything further?
9 Kevin?

10 MR. ENGELBERT: Why do you add the
11 sulfur dioxide to that?

12 MR. MARCURA: In my opinion,
13 sulfur dioxide is being added to keep down the
14 putrifactive organisms, to select for lactics.
15 And at the end of the process, at the end of
16 the process, to kill the lactics so that the
17 digestion of the proteins doesn't continue.
18 That's consistent with the use of sulfur
19 dioxide in wine, it's consistent with the use
20 of sulfur dioxide in a few other processes.

21 MR. GIACOMINI: Any other
22 comments, questions? Jay?

1 MR. FELDMAN: Thank you.

2 So it's -- you guys buy corn steep
3 liquor for your product, right?

4 MR. MARCURA: Yes.

5 MR. FELDMAN: You're not the
6 manufacturer?

7 MR. MARCURA: We don't
8 manufacture.

9 MR. FELDMAN: You don't
10 manufacture.

11 MR. MARCURA: Yes.

12 MR. FELDMAN: And you mentioned
13 that there were free amino acids in the end
14 product?

15 MR. MARCURA: Yes.

16 MR. FELDMAN: Okay. So there's
17 cysteine in the end product?

18 MR. MARCURA: Probably yes.

19 MR. FELDMAN: Okay.

20 MR. MARCURA: But there would be the
21 twenty-whatever, four or five --

22 MR. FELDMAN: Where does the

1 cysteine come from?

2 MR. MARCURA: Probably from the
3 corn protein.

4 MR. FELDMAN: Okay. How did it
5 get into the steep water?

6 MR. MARCURA: By digestion,
7 microbial digestion.

8 MR. FELDMAN: Okay.

9 MR. MARCURA: The sulfur dioxide
10 breaks only the disulfide bonds, according to
11 the -- to some research -- only the disulfide
12 bonds, but not the primary bonds of the
13 protein backbone. It only breaks disulfide
14 bonds. It has no activity against primary
15 bonds, carbon-to-carbon or carbon-to-nitrogen
16 bonds. So the fact that there are free amino
17 acids only proves that the lactic acid
18 bacteria or lactics are doing digestion as
19 I've outlined.

20 MR. FELDMAN: Okay. So to answer
21 Kevin's question, though, if -- I mean, you're
22 bringing interpretation to Bis and Cogen --

1 MR. MARCURA: Yes.

2 MR. FELDMAN: -- which I'm not
3 sure there's agreement on, given --

4 MR. MARCURA: There is --

5 MR. FELDMAN: -- where their
6 conclusion is, I'll read you --

7 MR. MARCURA: There is full
8 agreement.

9 MR. FELDMAN: -- what they're
10 saying the major role of sulfur dioxide in
11 steeping is to cleave disulfide linkages,
12 thereby loosening the protein matrix that
13 encapsulates the starch granules.

14 MR. MARCURA: Can you also read
15 the second to the last -- could we have slide
16 number six, please, and I'll show you what
17 they say about this particular process.

18 The reason they're making -- the
19 last slide, number six, please.

20 Contrary to the above, contrary to
21 the process which you're talking about, and
22 they've decided -- they've done the study

1 where they've shown that sulfur dioxide does
2 break disulfide bonds. But in order to do
3 that, there has to be a high concentration of
4 sulfur dioxide, which they do in their
5 laboratory setting, they replenish sulfur
6 dioxide every five hours to 2,200 parts per
7 million, every five hours, throughout their
8 steeping process. In addition, they have no
9 lactic fermentation in their artificial
10 steeping process.

11 So under those circumstances, yes,
12 disulfide bonds are broken by sulfur dioxide.
13 But in order to do that, there has to be three
14 conditions that have to be met, and I've
15 outlined them in my submission. The first one
16 is that sulfur dioxide has to be in its active
17 form. SO_3 minus two. The second one is that
18 the corn has to be at a high pH, they say 5.8.
19 And third one is that there has to be a
20 driving force, the concentration gradient
21 between sulfur dioxide in the liquid and the
22 sulfur dioxide at the active site, which is

1 the interior corn. Those three conditions are
2 present under lab conditions, which is what
3 most of their paper is about.

4 However, they are not present
5 under the commercially-produced steep liquor,
6 counter-current steeping process which is
7 practiced by 100 percent, as far as I know, of
8 North American steep liquor production, which
9 is being used in fertilizer production. Those
10 conditions are absolutely not met. The reason
11 they are not met is -- that's why it's called
12 counter-current. New corn is added to oldest
13 steep liquor, high concentration sulfur
14 dioxide, high concentration of lactic acid,
15 very active fermentation going on. Microbes
16 are dividing and growing very rapidly.

17 If we could have slide two,
18 please? I'm sorry, slide one, and I'll show
19 you the graph. Slide one, please. Oh, slide
20 two then. I need the graph that shows --
21 right here.

22 Right here, we have -- this is the

1 zero time edition, zero time before the
2 process starts. The process starts with old
3 steep liquor -- with old steep liquor, right.
4 At this point, the acidity is at its maximum.
5 Sulfur dioxide concentration is at its very
6 minimum. There is a very, very vigorous
7 lactic fermentation going on at this point.
8 The corn itself gets steeped and soaked within
9 15 hours. Can you please take a look at the -
10 -

11 MR. FELDMAN: I have it in front
12 of me.

13 MR. MARCURA: Yes, okay, good.
14 Within 15 hours.

15 So within this 15 hours, the corn
16 goes from about 6.8 to pH 4 because that's
17 where this process is buffered out. When the
18 corn is down at pH 4, it is not able to -- the
19 sulfur dioxide is not able to break disulfide
20 bonds because it is in its inactive HSO₃ minus
21 four. Even if it gets in there, it can't do
22 it. The only reason that Bis and Cogen are

1 achieving the breakage of bonds is because
2 they are replenishing sulfur dioxide every
3 five hours in order to keep that driving force
4 behind it, in order to be driving the sulfur
5 dioxide into the corn. And it only happens
6 while the corn is at a higher pH than 4.

7 And if you read their conclusion
8 on the last paragraph there, contrary to this
9 process that we have set up in the lab, if you
10 see every one of these, every one of these
11 says, okay, this is the convert -- this is the
12 counter-current process. But if we go to
13 figure -- to slide three, please. To slide 3,
14 please bring it up so you have the caption.
15 This is the model solution system. This is
16 the laboratory setup system. They say, look
17 at that, solution contains 2,200 parts per
18 million, et cetera, but it is replenished with
19 sulfur dioxide every five hours. Please read
20 the caption and you will see. That's where
21 the misinterpretation on this whole discussion
22 has been all along.

1 And I, for the life of me, can't
2 understand why people -- unfortunately, this
3 is sort of the devil is in the details. As a
4 scientist, I go into the experimental design
5 when I don't understand what's happening and
6 when I want to evaluate what the actual
7 results mean. The experimental design here is
8 that they used 2,200 parts per million every
9 five hours for the duration of the process.
10 And the counter-current process in industry
11 uses about 2,000 parts a million two hours
12 before the corn is ground. In other words, at
13 the very end of the process.

14 If they wanted sulfur dioxide to
15 break disulfide bonds, they would have added
16 that at the beginning, not at the end. They
17 leave it after the fermentation process to
18 break disulfide bonds and to free the starch.
19 And they use sulfur dioxide at the end of the
20 process to kill the fermentation so that it
21 doesn't continue hydrolyzing proteins when
22 they need the proteins as whole. Because when

1 they harvest proteins, they don't harvest
2 polypeptides. They harvest whole proteins.

3 MR. FELDMAN: Okay. So basically
4 your bottom line is that, the methodology the
5 researchers used is different than the
6 methodology used in industry?

7 MR. MARCURA: Totally different.

8 MR. FELDMAN: Totally different?

9 MR. MARCURA: Totally different.

10 And unfortunately it uses the same agents, it
11 uses similar terminology, but unfortunately a
12 lot of people misunderstand those two and
13 think they are the same. They're absolutely
14 not the same.

15 MR. FELDMAN: How do you -- how
16 would you suggest that the Board, the NOSB --
17 because it seems to me that you're saying, if,
18 in fact, the breaking of the disulfide bonds
19 occurred and the -- you know, the reactions
20 occurred in terms of breaking of covalent
21 bonds associated with the manufacturing
22 process, that that indeed would yield a

1 process that could be characterized as
2 chemical change. It seems like you're
3 implying that, I don't want to put words in
4 your mouth.

5 MR. MARCURA: No, I'm not.

6 MR. FELDMAN: You're not implying
7 that?

8 MR. MARCURA: No, I'm sorry, I'm
9 not implying that.

10 MR. FELDMAN: You're not implying
11 that Bis and Cogen created chemical change in
12 their laboratory study?

13 MR. MARCURA: No, that's
14 absolutely what they did.

15 MR. FELDMAN: They did do that?

16 MR. MARCURA: Yes, they did.

17 MR. FELDMAN: So I guess what I'm
18 asking you is --

19 MR. MARCURA: That has nothing to
20 do with the process that's used for making --

21 MR. FELDMAN: I understand that.

22 MR. MARCURA: Yes.

1 MR. FELDMAN: But if the process
2 were to be similar to that described by Bis
3 and Cogen, you would consider that a chemical
4 change?

5 MR. MARCURA: I still wouldn't
6 because disulfide bonds do not determine
7 primary structure of proteins. Disulfide
8 bonds determine tertiary and quaternary
9 structure of proteins, not the primary. A
10 common understanding among chemists, among
11 protein chemists is that primary structure is
12 chemical structure of the proteins. Secondary
13 as well. Tertiary and quaternary are only the
14 functional properties of proteins that
15 determine orientation in space or biological
16 activity. So enzymes, for example, will have
17 quaternary structure where not only are the
18 chains of proteins bound by disulfide bonds
19 but larger proteins are bound in a particular
20 configuration that gives it biological
21 activity. So disulfide bonds do not qualify
22 as the chemical structure bonds of proteins.

1 MR. FELDMAN: Okay. So this is
2 where -- I hate to drag this on, but I just
3 want to say that this is where we're having a
4 problem in terms of applying Appendix C of the
5 basic chemistry in the NOSB Policy and
6 Procedures Manual because there we're talking
7 about a process of denaturation which causes
8 physical change. The most observable result
9 is a loss of biologic activity --

10 MR. MARCURA: Exactly.

11 MR. FELDMAN: -- except for
12 cleavage of disulfide bonds, denaturization
13 stems from changes in secondary, tertiary and
14 quaternary structures through disruption of
15 non-covalent interactions.

16 MR. MARCURA: But not --

17 MR. FELDMAN: But what we're
18 seeing in the Bis and Cogen piece is a two-
19 step process. And that's why -- I mean, you
20 don't seem to be acknowledging that they've --
21 they've created a process which, I believe,
22 according to our definition, a two-step

1 process which includes the first part being
2 denaturization -- would it be denaturization
3 and naturation and the displacement reaction.

4 MR. GIACOMINI: Excuse me, Jay, I
5 understand --

6 MR. FELDMAN: All I'm saying is --

7 MR. GIACOMINI: I know, but just
8 your time here has gone through as much as he
9 would have been speaking. So we need to move
10 on.

11 MR. FELDMAN: I just want to --
12 what I'm worried about is that there's a
13 process here that scientists have identified.
14 It seems to conform to the basic chemistry in
15 our guidelines. You are dismissing that.
16 You're saying two things to us. One, we're
17 not using the process that Bis and Cogen adopt
18 in the laboratory. I understand that. But
19 then you're also dismissing their findings as
20 well as not replicating -- as not establishing
21 chemical change. And that's where I have a
22 problem because I want to get to the point

1 where we can identify the process you're
2 using, if in fact it doesn't cause that
3 reaction.

4 MR. GIACOMINI: Okay. We've got
5 to move on, please.

6 MR. FELDMAN: So I think we have a
7 problem --

8 MR. GIACOMINI: Jay, Mike, please.
9 And Katrina?

10 MS. HEINZE: I appreciate your
11 insight today.

12 What I was going to say is, I know
13 we have a lot of public commenters today and
14 I want to make sure they have their time. I
15 was wondering if you would be here tomorrow,
16 I expect we'll have more questions.

17 MR. MARCURA: Yes.

18 MS. HEINZE: Okay.

19 MR. GIACOMINI: Tracy?

20 MS. MIEDEMA: Super quick
21 question. Is it possible to buy Bis and Cogen
22 style corn steep liquor?

1 MR. MARCURA: No.

2 MS. MIEDEMA: Okay.

3 MR. MARCURA: Nobody makes it.

4 That's only a laboratory creation.

5 MR. GIACOMINI: Okay. Further
6 questions?

7 (No response.)

8 MR. GIACOMINI: Okay. Thank you
9 very much.

10 MR. MARCURA: Thank you.

11 MR. GIACOMINI: Okay, Christopher
12 Ely, Mark McKay and Doug Swantner.

13 MR. ELY: I'm Chris Ely, co-
14 founder of Applegate Farms.

15 Applegate welcomes the idea of a
16 single national organic animal welfare
17 standard and we applaud the NOSB for defining
18 these standards with input from stakeholders.
19 Applegate has been working with livestock
20 farmers who have closely modeled what is now
21 the organic production industry since 1986.
22 As such, these producers have shown us a full

1 range of animal welfare practices and we have
2 learned what is critical for animal welfare.

3 We have discovered that there are
4 often two categories of standards. Those
5 which are science-based and those which are
6 based on perception. We believe the NOP
7 standards must be based on a scientific
8 criteria that enhances the lives of organic
9 livestock while maintaining the consumers'
10 positive perception of our industry.

11 With 24 years of experience
12 working with farms that raise animals without
13 the use of antibiotics, growth promotants or
14 other drugs that enhance or insist with CAFO-
15 style livestock practices, we have learned
16 that the two critical criteria in this model
17 are stocking densities and management.

18 We would suggest the following
19 recommendations to the proposed stocking
20 densities. The statement at the beginning of
21 the stocking density charts reads, young must
22 be kept indoors when there is a danger of

1 frostbite. We would recommend changing the
2 statement to young may be kept indoors during
3 extreme weather conditions and/or the threat
4 from predators. Due to mortality, we believe
5 that stocking densities need to be defined as
6 forecasted numbers and weight at the time of
7 slaughter, not at the time of placement in the
8 barns.

9 The stocking density for bovines
10 seem to be similar to those found in CAFOs.
11 According to the standard of 40 feet -- 40
12 square feet for a 770 to 1,100 pound cow or
13 steer, an acre of ground could contain over
14 1,000 cattle. I put it that way because I
15 have my own farm and it's easy for me to look
16 at what an acre of land can hold. This is an
17 unhealthy and unsustainable practice, even for
18 a sacrificial paddock.

19 Applegate would suggest that input
20 from organic beef producers be gathered as a
21 way of defining a realistic standard. The
22 proposed stocking density of seven pounds per

1 square foot for turkey is more than half the
2 recommended stocking density of the
3 conventional turkey industry as seen through
4 the National Turkey Federation Animal Handling
5 Guidelines, which is 15 pounds per square feet
6 -- 15 pounds, yes, I said it right.

7 Although we are not proposing that
8 15 pounds per square feet is appropriate, our
9 experience with both organic and antibiotic-
10 free turkey grow out is that 12 square feet is
11 more than sufficient to maintain a healthy
12 environment and allow birds to roam freely,
13 open their wings, have ample feed, water and
14 scratching space and to practice natural
15 behaviors. This standard also allows for
16 lower than 25 ppms of ammonia levels
17 recommended by the NOSB.

18 Applegate believes that 25 ppms of
19 ammonia standards allows for a substandard
20 growing practice in poultry barn and therefore
21 we recommend a standard of 20. When density
22 is reduced, also is ammonia reduced. Twenty-

1 five ppm is a commercial industry standard but
2 20 ppm is achievable for the organic industry.
3 Although at certain times of the year under
4 certain weather conditions, ammonia can spike
5 over the standard of 20 ppm. Most times this
6 is a temporary situation and can be quickly
7 resolved by a well-managed poultry farm.

8 There seems to be a perception
9 among the general public, and even within the
10 industry, that organic handling of slaughter
11 standards address animal welfare at a higher
12 level than commercial operations that follow
13 the AMI guidelines written by Dr. Temple
14 Grandin. This is not true. Applegate
15 believes, and has experienced the standards
16 written by Dr. Grandin and adopted by much of
17 the conventional industry during the last
18 decade are science-based and ensure the
19 highest level of welfare currently available
20 to livestock slaughter operations. The
21 criteria focus on the measurable outcomes that
22 are clearly defined and quantifiably measured.

1 These present AMI animal welfare handling of
2 slaughter standards are reviewed annually and
3 updated accordingly as seen through the recent
4 release of the transportation standards.

5 Applegate recommends that the NOP
6 adopt the AMI recommended animal handling
7 guidelines and audit guide for slaughter. If
8 NOP adopts the AMI standards, it would save
9 having to train organic auditors on slaughter
10 standards as many plants have already been
11 audited by CAFO-trained third-party auditors
12 on the same standard. The adoption of these
13 slaughter standards could save plants which
14 currently slaughter organic livestock an
15 additional third-party audit specific to
16 organic.

17 MR. GIACOMINI: One more thought.

18 Oh, you're done. Okay.

19 MR. ELY: Done.

20 MR. GIACOMINI: Questions,
21 comments?

22 (No response.)

1 MR. GIACOMINI: So you're done.

2 Thank you very much.

3 Mark? Okay, Mark, Doug and
4 Gwendolyn.

5 MR. McKAY: Mark McKay. I'm with
6 Coleman Natural Foods. I appreciate the
7 opportunity to address the Board and the NOP.

8 My comments today are going to be
9 specific to, actually the same as the previous
10 speaker, addressing the stocking density,
11 outdoor access and animal welfare guidelines.

12 Coleman Natural Foods has been in
13 the national organic broiler production
14 business for over 25 years. We have
15 operations in both California and
16 Pennsylvania, and hopefully within a couple
17 weeks we will be in organic production in the
18 state of Washington as well. Within the last
19 two or three years, we were actually the pilot
20 company for the Global Animal Partnership and
21 their U.S. rollout and pilot program for the
22 STEP program for animal welfare. When we

1 started that in Pennsylvania three years ago,
2 we have 70 family farmer operators who all
3 have achieved either the step 2 level grade or
4 higher within both our organic and our
5 antibiotic-free raising operations.

6 As a broiler producer, we're very
7 supportive of the discussion documents.

8 However, we would encourage, actually, that
9 the Livestock Committee in particular take
10 into consideration some additional standards
11 that we think should be added to the
12 discussion. We do believe -- and I heard one
13 of the speakers earlier mention this as well,
14 that precise standards create a very level
15 playing field among the producers, and I
16 think, in turn, that will generate higher
17 level of confidence among the consumers which
18 I think, in turn, will benefit the entire
19 organic industry.

20 We at times resist the urge to
21 turn our packages, our consumer packages, into
22 a NASCAR car with the proliferation of label

1 claims and attributes about the products. But
2 one thing that does come up, and I think
3 probably because people see it within the
4 places where they buy these products is that
5 animal welfare and animal welfare
6 certification is an amendment that typically
7 gets added before all others and is added in
8 addition to the organic certification for
9 certified organic poultry products. And in my
10 opinion, I think that organic and the organic
11 certification for these products should say it
12 all, that you don't have to add an incremental
13 statement about certification for animal
14 welfare, that it should be included with what
15 comes along with all the rest of the things
16 that we do from an organic standpoint.

17 I would also comment that, in
18 general, I'm not as familiar with the AMI
19 guidelines, but the National Chicken Council
20 has a broad range of what they consider to be
21 animal welfare guidelines for conventional
22 producers. I would actually say that they're

1 fine and the -- in general, the conventional
2 industry adheres to them fairly rigorously.
3 I actually see those as a foundation, as a
4 starting point, and that there are additional
5 things that our industry should do incremental
6 to that to encourage natural behavior and
7 promote the additional welfare of the animals
8 in our care.

9 I'll skip through to this. I'll
10 speak specifically to stocking density and
11 outdoor access. We actually have some farms
12 where we've been frustrated in the past, and
13 I'll speak first about access. That the birds
14 don't -- at least have not gone outdoors, have
15 not gone and enjoyed the access to the
16 outdoors as much as we would like. And so
17 we've actually taken a lot of effort recently
18 to modify the things that we do from a
19 husbandry practices standpoint in order to
20 encourage that behavior. So we've started to
21 work on the things structurally that we have
22 to do in order to promote and encourage birds

1 to go outside.

2 And a lot of the things that are
3 actually in the discussion document from the
4 Livestock Committee are very similar to some
5 of the things that we've found. That it's not
6 just enough to have a door. You have to have
7 a wide opening that gives a large amount of
8 access across the entire length of the barn.
9 It helps to have that at ground level rather
10 than high -- rather than have a ramp up and a
11 ramp back down. When the birds first start to
12 go outside, it is very helpful to have some
13 kind of protective covering, either a shade
14 cloth or a little overhang or something else
15 like that. In fact, we found that the most
16 amount of birds that were able to go outside
17 to go out on their own, is where we give them
18 a significant amount of protection over the
19 top of their barns or over the top of their
20 forage areas.

21 I will also comment on this. On
22 both transport, handling and stunning

1 procedures, there are a significant amount of
2 incremental items that can be measured that
3 the industry is currently doing that are far
4 in addition to the industry standards relative
5 to catching, handling, transportation and
6 holding of the animals. And even that part,
7 just prior to the primary process within the
8 slaughter plants as well, that can be very
9 clearly defined, that the industry can very
10 confidently and comfortably live up to at
11 standards that are greater than the quote,
12 unquote, industry standards.

13 We look forward to the continued
14 efforts and we're here to help in order to
15 continue to build the confidence in the
16 consumers in our organic products. Thank you.

17 MR. GIACOMINI: Questions,
18 comments?

19 (No response.)

20 MR. GIACOMINI: Thank you.

21 MR. McKAY: Sure.

22 MR. GIACOMINI: Okay, Doug? Okay,

1 Doug, Gwendolyn, Peggy Miars, just letting the
2 Board and everyone know we are moving quickly
3 past over two hours behind schedule. So we'll
4 see how things go.

5 Go ahead.

6 MR. SWANTNER: Good afternoon. My
7 name is Doug Swantner and I'm a retired
8 government worker. I spent 30 years working
9 with the Department of Interior and Department
10 of Agriculture and Fire and Aviation,
11 specifically with Forest Service and Bureau of
12 Land Management. I'm speaking as a concerned
13 consumer concerning the sulfides in organic
14 wine issue.

15 Let me start by saying that I have
16 a sensitive constitution and have learned what
17 I can comfortably eat and drink and what
18 things adversely affect me. I'm allergic to
19 bee stings and scallops and seem to have a
20 sulfide intolerance also. I carry an Ana-kit
21 with me at all times in case of allergic
22 reaction and have experienced going into

1 anaphylactic shock twice.

2 I never was much of a wine drinker
3 in my earlier days, a glass or two always made
4 me feel bad and I would get headaches and
5 intestinal discomfort for at least a day
6 afterward. I pretty much quit drinking wine
7 after that, just feeling that something in it
8 inherently didn't agree with me. Like I
9 mentioned, I've always been conscious of my
10 food and beverage intake and, as the organic
11 movement gained momentum, I got into it more
12 and more as it made sense to me not to be
13 consuming harmful chemicals and pesticides
14 when there was a more healthy alternative
15 available. Plus I felt a whole lot better
16 eating organically. And with things like
17 wine, which I thought I could never drink, I
18 found that organically that could be a whole
19 different thing for me.

20 I knew Phil LaRocca from earlier
21 days in Quincey, California, where I still
22 live, before he started his wine-making

1 business in the Sierra foothills a few hours
2 from where I live. He had been a early
3 pioneer of the organic movement and was also
4 teaching natural food classes at Chico State
5 University. I knew he was growing grapes
6 organically and taking it to a step further by
7 not adding any sulfides in the process of
8 cleaning containers or as a preservative. And
9 when he started making his wines, I mentioned
10 that I was not really into wine as I seemed to
11 get sick and -- whenever I drank it. He
12 commented that I probably had an allergy to
13 sulfides and that many people had this and
14 weren't even aware of it, and that I should
15 try his wines and see how they treated me.

16 To my amazement, I found that I
17 could drink his wines and feel good while
18 drinking and then not have the headaches and
19 intestinal discomfort I had experienced in the
20 past. It was then I decided that I definitely
21 had an allergy to sulfides. When I drink a
22 wine that contains added sulfides, I'm like a

1 barometer. I immediately get stuffed up and
2 congested. The more sulfides, the more
3 immediate and intense the reaction. And this
4 was my first indicator that my body has
5 ingested something that it is rejecting. I
6 have tried to stay away from anything with
7 added sulfides and the fact that wine grapes
8 have some naturally occurring sulfide content
9 seems to be okay with my body.

10 With a heavily-sulfide wine, I can
11 actually smell and even taste the sulfides.
12 So now I have been drinking the LaRocca wine
13 for about 20 years, along with a few other
14 truly organic wines that I have learned to
15 trust. When I buy wines, I stay away from the
16 bottles that say, made with organically-grown
17 grapes, because I know that they have added
18 sulfides. And looking at the back of the
19 bottle, on the label, you can confirm this.
20 When I see a bottle that is labeled organic
21 wine, then I am comfortable know that the
22 whole process, from the growing to the

1 bottling, has been accomplished without any
2 added chemicals compromising the organic
3 quality. I don't have to look on the back
4 label to see if it contains the clause,
5 contains sulfides. When I see the organic
6 wine label, that is what I have grown
7 accustomed to expect, is just that, a
8 completely organic wine.

9 I don't want to be misled into
10 drinking something that is labeled organic but
11 is allowed to have a certain percentage of
12 added sulfides. It's misleading and could be
13 dangerous for me and potentially many other
14 consumers who might not even know they are
15 sulfide sensitive. I understand now that a
16 proposed amendment is before the USDA and NOSB
17 that wants to allow 100 percent -- or 100
18 parts per million into wine of sulfides and
19 still have it retain the organic wine label.
20 I don't understand what the rationale is
21 behind this. When I buy organically-produced
22 products, why should I have to second-guess

1 that? I don't want to buy an organically-
2 labeled wine, or yogurt for that matter, and
3 essentially not really know what I'm getting.
4 What's the point if, by some law, that these
5 products can actually contain a certain amount
6 of additives or chemicals? It makes a mockery
7 out of the organic philosophy and the people
8 who are trying to eat and drink as naturally
9 as possible.

10 I say let organic be just that,
11 totally organic, otherwise you will never know
12 truly what you are buying as a consumer. And
13 to me, that is a breach of the freedom of
14 information that we hold so dearly in this
15 country. This compromise in the case of
16 organic wines is a bad idea and can only lead
17 to more of the same in other products.

18 MR. GIACOMINI: Thank you. Any
19 final -- do you have any final word, or --

20 MR. SWANTNER: I just wanted to
21 say that I trust that people like the Freys
22 and the LaRoccas will continue to make truly

1 organic wines, whatever happens with the
2 labeling issue. But I just -- what bothers me
3 is that their efforts would be invaded if
4 their wines get grouped in with other products
5 that are added to allow the 100 percent or 100
6 parts per million sulfide and still use the
7 same label.

8 MR. GIACOMINI: Okay. Questions,
9 comments?

10 (No response.)

11 MR. GIACOMINI: Thank you.

12 MR. SWANTNER: Thank you.

13 MR. GIACOMINI: Gwendolyn, Peggy
14 and Lindsay.

15 MS. WYARD: Good afternoon. My
16 name is Gwendolyn Wyard and I'm commenting
17 today on behalf of Oregon Tilth, a non-profit
18 organization supporting biologically sound and
19 socially equitable agriculture. My position
20 there is the technical specialist for the
21 processing program. I'm going to highlight a
22 few selected topics. You have all our

1 comments in writing where you can refer to the
2 detail.

3 First on the USDA regulations with
4 respect to the made with label, we don't
5 believe that when consumers look at a label,
6 if that label had statements certified to be
7 USDA regulations, we truly don't believe that
8 they'll immediately understand that the
9 product or handler has gone through the same
10 certification process as an organic product.
11 Probably instead they would wonder what are
12 those USDA regulations and certified to what?

13 For the record, we wholeheartedly
14 support the made with labeling category and we
15 would like to see consumers understand the
16 rigorous certification process that is applied
17 to this label. However, we feel that this
18 should be done through educational efforts
19 emphasizing any agricultural product making an
20 organic claim on the principle display panel
21 must be certified to the USDA NOP regulations,
22 exemptions, exclusions and non-scope products

1 noted. So it's a young regulation and time,
2 education and awareness is the answer, not
3 another labeling claim that leads to confusion
4 and label reading fatigue.

5 Yeast. This is my thirteenth
6 consecutive Board meeting. In October of 2004
7 Oregon Tilth came to the Board and asked that
8 you help to clarify the definition of non-
9 agricultural. So for 13 meetings I've been
10 listening to this discussion, following
11 closely and helping out, and I've seen yeast
12 be the holdup in many respects, trying to
13 classify yeast, when really the issue here was
14 giving yeast a chance, allowing it to have
15 organic preference assigned to it. So I'm
16 here today to say, let's give yeast a chance.
17 I think it's a great compromise, it will
18 promote the production of organic yeast
19 resulting in increased organic acreage. It
20 recognizes that yeast can meet the '95 five
21 composition standards for a processed
22 agricultural product without categorically

1 classifying all microorganisms as
2 agricultural. It recognizes the difference in
3 composition requirements for products intended
4 for human consumption versus livestock
5 consumption, and most importantly it's
6 consistent with NOP's guidance and
7 certification of organic yeast and processed
8 agricultural products, NOP 5014, effective
9 March 2nd, 2010.

10 Nanotechnology, we're in favor of
11 the locked door, a.k.a., they are synthetic,
12 therefore they're prohibited now today. And
13 we support that the NOP take action now by
14 adopting the recommended guidelines.

15 We also would like to publicly
16 recognize that there is widespread public
17 concern over the use of nanotechnology and
18 emphasize that, in any possible future
19 consideration of nanotechnology, the burden of
20 proof must weigh strongly against the
21 proponents to prove that the material is safe.
22 At this point in time, too little is known

1 about the impact of nano particles on human
2 health and the environment, therefore we do
3 support the precautionary principle as we move
4 ahead in our efforts to learn more about its
5 applications. But we do not support a general
6 prohibition of nanotechnology. It's
7 synthetic, it's prohibited.

8 Limitations of 205.101(b), we
9 request that the CACC make it very clear that
10 the intent of this recommendation is to
11 require traders, brokers and distributors to
12 become certified when the conditions of
13 205.101(b) are not met, and ownership is
14 transferred from the certified operator to the
15 uncertified broker, trader and distributor.
16 Please clarify that this does not include the
17 third-party contracted transportation of
18 certified product from one certified operator
19 to the next.

20 And finally, I'd like to draw your
21 attention to a comparison chart that we've
22 included in our comments. This is with

1 respect to nutrient vitamins and minerals.
2 Our concern is that somewhere between the
3 intent of the Board and the recommended
4 annotation that wasn't accepted, the program's
5 decision to reference 21 CFR 104.20 containing
6 the nutrient listing that hasn't been amended
7 since January of 1993, and then the FDA
8 clarification of the interpretation on 104.2,
9 we have or will lose the ability to use
10 nutrients that may be essential or at very
11 least reasonably desirable in the diet. So
12 what I have done is I have put a side-by-side
13 comparison of the vitamins and minerals listed
14 in 104.20. The vitamins and minerals that are
15 listed in 101.9(c)(8), and this is -- 101.9
16 establishes the declaration of nutrition
17 information, and specifically that portion
18 sets the RDIs and nomenclatures established
19 for vitamins and minerals which are essential
20 in human nutrition. So I'll just point out
21 quickly to wrap up here that the highlighted
22 ones, selenium, manganese, chromium, these

1 here that are listed in 101.9, these are
2 commonly used. We, as an organization, have
3 been allowing those vitamins and minerals
4 because 104.20 specifically references 101.9
5 in the beginning, and it states that, from
6 time to time, they recognize that the
7 nutrients listed in 101.9 may be updated. And
8 that has been more recently updated than
9 104.20. So this is a real problem for several
10 products that are out there.

11 Thank you very much.

12 MR. GIACOMINI: Thank you.

13 Questions and comments? John?

14 MR. FOSTER: Thank you Gwendolyn,
15 that's really helpful. I love a good
16 analysis, you know?

17 MS. WYARD: Thank you, John.

18 MR. FOSTER: So on the 101(b) --
19 on the 101(b) deal, there's -- my question is
20 about transfer of ownership being a lynchpin.
21 In the case of a broker, it's often not a
22 transfer of ownership but a transfer of

1 possession, not necessarily of title. Would
2 it be fair to say that if an uncertified
3 operator storing, accumulating, parceling out
4 over time, is title absolutely necessary as a
5 lynchpin for you or for Oregon Tilth?

6 MS. WYARD: I think it is. I
7 think it's important.

8 MR. FOSTER: Title is important?

9 MS. WYARD: Title is important.

10 MR. FOSTER: Okay, thank you.

11 MR. GIACOMINI: Tracy?

12 MS. MIEDEMA: Does the program
13 have any position on compliance of products
14 that contain vitamin K currently?

15 MR. McEVOY: Yes, the position is
16 that there was a broad interpretation of
17 nutrient vitamins and minerals in reference to
18 104.20, and that's where we're issuing draft
19 guidance to clarify what -- the FDA's
20 interpretation of what is allowed under 21 CFR
21 104.20. So vitamin K would be currently
22 allowed under the previous allowance by NOP

1 and by certifiers.

2 MR. GIACOMINI: Okay. Jay?

3 MR. FELDMAN: Cut me off after
4 three minutes, okay?

5 MR. GIACOMINI: Okay.

6 MR. FELDMAN: Thank you. You
7 know, maybe you can help me with this,
8 Gwendolyn, I'd appreciate it. We -- the Board
9 received a technical review from the USDA's
10 science and tech, and the world seemed simple
11 back then because we received a document that
12 says the sulfur dioxide added to the fermented
13 material that -- I'm talking about CSL - the
14 sulfur dioxide added to --

15 MR. GIACOMINI: Wait, wait, Jay.
16 She didn't.

17 MS. WYARD: Oregon Tilth did not
18 submit comments on corn steep liquor, and so
19 I'm not prepared to make any comments.

20 MR. FELDMAN: Is that right?

21 MS. WYARD: It's true.

22 MR. GIACOMINI: I don't know, it's

1 listed here on the list, but I -- she
2 certainly didn't mention.

3 MR. FELDMAN: We know she didn't,
4 but it's in her --

5 MS. WYARD: We -- I certainly --
6 it's true, it is. But if I did answer any
7 questions it would be by Gwendolyn Wyard and
8 not Oregon Tilth.

9 MR. FELDMAN: Okeydoke.

10 MR. GIACOMINI: Lisa, can you take
11 us up to the top of that chart, please? And
12 the first column is the one that we're
13 supposed to be working with, right, Gwendolyn?
14 Okay.

15 MS. WYARD: That is the -- yes,
16 the -

17 MR. GIACOMINI: Have you ever had
18 to deal with an issue of added protein under
19 this listing?

20 MS. WYARD: We have had operators
21 submit a request for a formulation that
22 contained various proteins, yes, where they

1 were classifying them as a protein and
2 pointing to 104.20. Now the problem as you
3 see up there is that the annotation
4 specifically references vitamins and minerals.
5 So that was the other part of the
6 clarification, that just because it's under
7 104-point -- well, (d)(3), the annotation
8 doesn't include protein.

9 MR. GIACOMINI: Okay. Any other
10 questions for Gwendolyn?

11 (No response.)

12 MS. WYARD: Thank you so much, and
13 especially thank you to the outgoing Board
14 members for your steady and absolutely
15 fantastic service and, at times,
16 entertainment.

17 MR. GIACOMINI: Okay. Peggy,
18 Lindsay and Kyla.

19 MS. MIARS: Good afternoon, my
20 name is Peggy Miars and as of about five weeks
21 ago I am the executive director of OMRI.
22 Thank you to the Board members for your

1 service in the organic industry -- service to
2 the organic industry, and thank you for this
3 opportunity to speak.

4 First of all, we're announcing
5 today that OMRI's products list has exceeded
6 2,000 products approved for use in organic
7 production and processing. And I've heard
8 OMRI's name mentioned several times over the
9 last couple of days, and I know that OMRI's in
10 a unique position as the global leader in
11 materials review. And along with that
12 position comes healthy debate and
13 disagreement. So I'm here today to affirm for
14 the analysts and the organic community that we
15 at OMRI strive for consistency and high
16 integrity in materials review. We are
17 supported by crops, livestock and processing
18 review panels comprised of individuals with
19 decades of experience in organic and many with
20 advanced degrees in sciences.

21 Our staff evaluates materials
22 based on chemistry, functionality and the

1 residue of synthetics. I personally look
2 forward to enhancing OMRI's relationship with
3 ACA's, the NOSB, NOP staff, EPA staff and
4 other agencies and organizations. And our new
5 management team is poised to take OMRI to the
6 next step in our history, and I invite any
7 NOSB members or organic stakeholders to
8 contact me with questions, comments or
9 concerns, just as some of you have been doing
10 since before I even started my new job.
11 However, I will defer any technical questions
12 to our review program manager, Lindsay
13 Fernandez-Salvador, who is our next speaker.
14 In other words, don't ask me about corn steep
15 liquor. I don't know.

16 MR. GIACOMINI: Is that -- oh --

17 MS. MIARS: That's it. I'm done.

18 Short and to the point.

19 MR. GIACOMINI: Questions and
20 comments? I'm so not used to having someone
21 not go past the buzzer that I'm just not ready
22 at all. Okay. Thank you very much.

1 MS. MIARS: Thank you.

2 MR. GIACOMINI: Okay. Lindsay, is
3 it Kayla or Kyla? Kayla?

4 MS. SMITH: Kyla.

5 MR. GIACOMINI: I had it right the
6 first time -- and Tiffanie.

7 Lindsay, go ahead.

8 MS. FERNANDEZ-SALVADOR: Okay,
9 thank you. I'm Lindsay Fernandez-Salvador.
10 I'm a program manager at OMRI. I was going to
11 spend most of my time talking about excipients
12 and 205.238(c)(2), but the NOSB answered my
13 questions and I sincerely appreciate your
14 response. That was a very sweet victory for
15 me, so I'm going to take it home and do
16 something with it.

17 Unfortunately, though, that leaves
18 me over four minutes to talk about my favorite
19 topic, corn steep liquor. I oversaw the
20 second of two votes that our advisory council
21 hops committee made on CSL. I probably have
22 the most intimate knowledge of how we arrived

1 at our synthetic classification than anybody
2 in this room. So I encourage anybody that
3 wants to know the truth about our decision
4 making to ask me. I've distributed a copy of
5 the decision tree that's in our policy manual,
6 it looks like that this, that OMRI used to
7 make our classification. This decision tree
8 was proposed by the NOP in March 2006 based on
9 NOSB recommendations. We use this decision
10 tree when evaluating materials that need
11 further clarification.

12 I'd like to start especially by
13 supporting Jay's statement that the NOSB
14 should base their vote on the process by which
15 corn steep liquor is manufactured and not the
16 compatibility to organics, because that is the
17 question that we're charged with by the NOP,
18 and that is what the public was asked to
19 comment on.

20 OMRI looks to the NOSB for
21 deliberations to inform our interpretations.
22 On Monday morning, I have to go back to work

1 and I have to help my staff understand how to
2 make classification decisions. Our decision
3 making process does not include compatibility
4 to organics. I strongly encourage members to
5 return to the facts of the manufacturing
6 process to inform your vote on the
7 classification of this material.

8 I'd also like to take a moment to
9 correct some misconceptions on part of the
10 committee -- one some of the part of the
11 committee members about classification
12 materials, and we did touch on this a little
13 bit during today's comment, but I just want to
14 reiterate that. The simple contact with the
15 synthetic not on the National List does not
16 automatically make an input synthetic. It is
17 the action of the synthetic during the
18 manufacturing process that leads to a chemical
19 change, and this is what renders the input
20 synthetic. Using this logic, that simple
21 contact causes an input to be synthetic, would
22 cause a sizeable portion of the 2,000 OMRI

1 list of products to come off our list.

2 Further, the statement that
3 because CSL is used in compost, it should be
4 allowed is not accurate. Once a compost feed
5 stock is classified as synthetic by virtue of
6 the chemical change brought on by the
7 manufacturing process, it is then prohibited
8 as a compost feed stock. To give you a very
9 obvious example, plastic will break down if
10 put in a compost pile, if you give it enough
11 time. But clearly we would not allow it as a
12 feed stock because it is synthetic. The same
13 is true about CSL, if it is first classified
14 as synthetic.

15 So in conclusion, I am confident
16 in OMRI's process by which we arrived at the
17 synthetic classification for CSL. Given the
18 debate I saw yesterday, I am not confident
19 that the NOSB members are on the same page on
20 how to make the classification, which is
21 essential to consistent decisions for the
22 greater good of the organic industry. I urge

1 you to consider the impact of your decision on
2 those of us that must make consistent material
3 classifications every day. Before taking your
4 vote tomorrow, please ensure that everybody
5 has used the same method to evaluate the
6 material, and only focus on the manufacturing
7 process and chemical change to determine the
8 classification.

9 Thank you.

10 MR. GIACOMINI: Questions -- Joe?

11 MR. SMILLIE: Were you in the room
12 for the previous testimony from --

13 MS. FERNANDEZ-SALVADOR: Yes.

14 MR. SMILLIE: -- the gentleman?
15 He went through the process and explained the
16 actual process.

17 MS. FERNANDEZ-SALVADOR: Yes.

18 MR. SMILLIE: What disagreements
19 with his -- would you have any disagreements
20 with his explanation of the wet milling
21 process?

22 MS. FERNANDEZ-SALVADOR: Dragan's

1 explanation was excellent. Thank you, Dragan,
2 for bringing that to light. I wish that he'd
3 have gone first because it was so thorough and
4 really explained the intricacies of the
5 process. And OMRI did take into consideration
6 his main points. And the main disagreement
7 was two-fold: One could argue that lactic
8 acid and lactobacilii is the only factor
9 causing the cleavage of disulfide bonds. And
10 that would then fall under naturally occurring
11 biological processes and we would remove this
12 from the classification of synthetic.

13 OMRI was not -- our advisory
14 council members on the crops committee was not
15 convinced that it was only lactobacilii that
16 was causing this cleavage. While that
17 argument is certainly true, that it probably
18 is causing some of the breakdown, it's
19 certainly not causing all of the breakdown and
20 that SO₂ is probably also cleaving disulfide
21 bonds.

22 MR. SMILLIE: Well, that's not

1 what he said. He said, if I can summarize it
2 in my layman terms, that basically that the
3 SO3 has the ability to do that, and that's
4 what the -- whatever their names are -- the
5 scientists did. But that in the commercial
6 wet milling process, because of the pH, it
7 wasn't doing it. And that it was there to
8 prevent putrefaction. So that the enzymes,
9 the lactobacilis enzymes could do that work,
10 and that the bulk of the work was being done
11 by them, and in fact, the chances of the
12 sulfurous acid doing the work was almost nil
13 because it wasn't -- the pH for it to operate
14 wasn't there at the time when that
15 concentration was there -- if I got it right.

16 MS. FERNANDEZ-SALVADOR: I think
17 you did, yes. And I would say that, without
18 putting words in any council member, I would
19 say that they were not convinced that it was
20 only happening via lactobacilii. That sulfur
21 dioxide or the active SO3 could and would also
22 create the same effect. And that if it was

1 created by SO₃, HSO₃, then it was synthetic in
2 that instance and would render the entire
3 product synthetic.

4 MR. SMILLIE: Thank you.

5 MR. FELDMAN: Joe, I wish -- I
6 really wish it was as simple as that. I mean,
7 we started this whole odyssey with a technical
8 review, which we try to do, you know, when we
9 review this stuff. And the first thing that
10 catches everybody's eye is the statement that
11 it's a complicated process of chemical --

12 MR. GIACOMINI: Jay, can we stick
13 to -- can we stick to questions for Lindsay,
14 please?

15 MR. FELDMAN: Yes. I want to --

16 MR. GIACOMINI: We're trying to
17 stay on the schedule.

18 MR. FELDMAN: Okay.

19 MR. GIACOMINI: We're getting back
20 to somewhere even close.

21 MR. FELDMAN: -- that are not
22 fully understood. So I guess what I'm asking

1 is, given that we received a technical report
2 which explicitly says it's a complicated
3 process not fully understood, and that the
4 sulfur dioxide added to the fermented material
5 to cleave disulfide linkages, which again was
6 the only finding we found in here as to why
7 sulfur dioxide was included, it's surprising
8 to learn at the eleventh hour now that there
9 is, in fact, a different process that does not
10 cleave the disulfide bonds. Is that a
11 surprise to you? Is this some new information
12 to you, having gone through this review
13 before?

14 MS. FERNANDEZ-SALVADOR: No, it's
15 not. We had the information that Dragan
16 presented just a few minutes, and that's just
17 a function of the person that you hire to do
18 your TR.

19 MR. FELDMAN: Yes, that's what we
20 did. Okay. What about the different levels
21 of sulfur in the end product? Why are we --
22 why do you believe we're seeing the different

1 levels of sulfur in the end product?

2 MS. FERNANDEZ-SALVADOR: We didn't
3 take that into account. We were convinced by
4 a lab result that there was a non-detect of
5 sulfites as a proxy for sulfurous acid. That
6 was not an issue in our synthetic, non-
7 synthetic determination.

8 MR. FELDMAN: Okay. Just to
9 summarize then. You've looked at the same
10 information that we heard previously, but your
11 position is that the reason for the
12 introduction of the sulfur dioxide is to do,
13 what?

14 MS. FERNANDEZ-SALVADOR: Our
15 position is that, while lactic acid or
16 lactobacilii is likely causing some or maybe
17 even the bulk of the disulfide cleavages, SO₂
18 cannot be ruled out that it is not cleaving
19 disulfides.

20 MR. FELDMAN: Thank you.

21 MR. GIACOMINI: Okay, question.

22 But your knowledge base -- I'm confused where

1 the knowledge base came from in the processes
2 that are used commercially to make corn steep
3 liquor. I'm confused where your knowledge
4 base came from to make that assumption, other
5 than it's just an assumption made to people,
6 for lack of a better term, without being --
7 without wanting to be intensive at all, but
8 these are things that made them comfortable?

9 MS. FERNANDEZ-SALVADOR: Well, the
10 knowledge base came from literature and the
11 same information that was presented just a few
12 minutes ago. And while some people are
13 convinced that it only happens by
14 lactobacilii, the evidence presented in these
15 papers did not convince our crops committee
16 that it was --

17 MR. GIACOMINI: They were corn
18 steep process or were they chemistry table
19 process?

20 MS. FERNANDEZ-SALVADOR: I don't
21 understand your question.

22 MR. GIACOMINI: They -- were they

1 the type -- were they corn steeped liquor
2 commercial processing processes or were they
3 studies looking at the -- like the other study
4 that he talked about?

5 MS. FERNANDEZ-SALVADOR: Corn
6 steep liquor manufacturing processes and also
7 the chemical explanation that was laid out by
8 Dragan.

9 MR. GIACOMINI: Okay. Joe?

10 MR. SMILLIE: Chopped liver.

11 MR. GIACOMINI: No, I'm just
12 standing there, I'm looking that way.

13 Katrina?

14 MS. HEINZE: I'll ask you the same
15 question I asked before, because I want to
16 make sure that folks on other topics get a
17 chance with us today before we completely burn
18 out. Are you here tomorrow?

19 MS. FERNANDEZ-SALVADOR: I am here
20 tomorrow until one-ish.

21 MS. HEINZE: That's good to know.

22 Thank you.

1 MS. FERNANDEZ-SALVADOR: I
2 appreciate the time. Thank you.

3 MR. GIACOMINI: A question from
4 the Board. Dragan has requested time at the
5 microphone to respond to this. What is the
6 opinion of the Board?

7 (Off mic comments.)

8 MR. GIACOMINI: Wait, Dragan, we
9 seem to be up for debate here. Are we going
10 to need to be very brief on this or -- I mean,
11 we're way behind schedule, folks.

12 MS. FERNANDEZ-SALVADOR: Might I
13 say that I don't want to get into a big debate
14 with anybody else. I'm relaying information
15 from other people. So I prefer that we do not
16 do that. At least I prefer not to be a part
17 of it.

18 MR. GIACOMINI: I think the
19 majority of the Board is to not right now. If
20 you're here tomorrow, we may do that and we're
21 just trying to get -- we think we understand
22 both sides, and it's going to come down to

1 just people's impressions of where the -- what
2 the facts are and where the information comes
3 from, and all of that, to make a decision for
4 any individuals who want to make a decision,
5 and people will disagree. So anything further
6 here?

7 (No response.)

8 MR. GIACOMINI: Thank you very
9 much, Lindsay. Next is Kyla.

10 MS. SMITH: Kyla.

11 MR. GIACOMINI: Kyla, Tiffanie and
12 Mr. Wolf.

13 MS. SMITH: Good afternoon. My
14 name is Kyla Smith, I am a certification
15 specialist and an inspector for Pennsylvania
16 Certified Organics. I am here to give some
17 insight into the need for clarification around
18 101(b) with a specific example on how this is
19 affecting our certified farmers in regards to
20 the brokering of hay and impact this has on
21 organic integrity.

22 This has really come to a head

1 over the past year and a half. This issue has
2 reared its ugly head at many inspections
3 during this time where the farmer who
4 purchased hay from a broker had a certificate
5 from the certified producer of the hay, and an
6 invoice from the broker whom is not certified.
7 There is obviously a missing link in this
8 audit trail which doesn't link the hay back to
9 the original grower. It would be way too easy
10 for a broker to acquire a certificate and pass
11 any hay off as certified.

12 In my mind, the issue at hand is
13 not whether the hay is considered a packaged
14 product or not, rendering a possibly
15 exclusion, the issue is whether the broker is
16 taking ownership of the hay, which is clearly
17 a function of handling as defined by the Rule.

18 For example, if a producer is
19 using a custom operator to haul hay, this
20 transport is put into their organic system
21 plan and covered during the producer's
22 inspection, including the audit trail. This

1 is clearly an instance where the trucker would
2 not need to be certified. On the other hand,
3 we are seeing these brokers take ownership of
4 the hay they are transporting as they are
5 reselling this hay and are providing a new
6 invoice. In some cases, they are breaking up
7 loads or combining loads from various farms.
8 In most cases, they are providing the
9 purchaser of the hay with a certificate but
10 without an invoice to link it back to the
11 original grower. Without that, the
12 certificate doesn't really mean anything.

13 As it currently stands, these
14 brokers are not seeking certification as they
15 believe they are excluded, therefore they are
16 not inspected, which greatly affects the
17 organic integrity of the cows which are being
18 fed this hay.

19 Sorry -- ultimately this falls on
20 the shoulders of the farmer that purchased the
21 hay. If they don't acquire the proper
22 documentation, their certification is the one

1 that is in jeopardy. In some cases, buying
2 from a broker is a new process for them, and
3 they are unsure of what documentation they are
4 required to have. In many cases, they are
5 probably being told by these brokers that, as
6 long as they have a certificate, that is all
7 they need. Farmers are literally about to
8 lose their certification because they are not
9 able to provide the documentation required to
10 prove that they -- that the feed they
11 purchased is, indeed, organic because these
12 brokers are not forthcoming with the original
13 invoice or transaction certificate or weight
14 slip, or whatever you want to -- whatever they
15 need.

16 As far as the costs are concerned,
17 not all brokers would need to be certified.
18 If these folks are clearly just hauling hay or
19 working on commission and not reselling by
20 taking ownership of this hay, they would not
21 need to be certified. However, I know that
22 it's my goal, as I believe it is many people

1 here, to grow the organic industry while
2 upholding organic integrity through the
3 enforcement of the regulations. Requiring
4 certification of brokers that are clearly
5 handling would result in a nominal fee for a
6 few while growing the industry. I also don't
7 believe the cost should be a basis on whether
8 or not an operation is required to be
9 certified.

10 While I can't predict if this will
11 increase costs to the farmer, it would
12 certainly be very minor in comparison to
13 losing their certification or inadvertently
14 buying from a broker who does not have
15 verifiable documentation.

16 I know this issue goes beyond hay
17 brokering in Pennsylvania, but I thought a
18 specific example would help to clarify the
19 need for guidance from NOP on this issue.

20 Thank you for your time and
21 diligence in this matter.

22 MR. GIACOMINI: Questions,

1 comments?

2 (No response.)

3 MR. GIACOMINI: Thank you.

4 MS. SMITH: Thank you.

5 MR. GIACOMINI: Tiffanie?

6 MS. HUSTON-LABBE: Yes.

7 MR. GIACOMINI: Bill Wolf and

8 Katherine -- Katherine.

9 MS. HUSTON-LABBE: Good afternoon.

10 I am Tiffanie Huston-Labbe, and I don't know
11 if it matters, last name, H-u-s-t-o-n, L-a-b-
12 b-e.

13 I'm the farm program manager at
14 Oregon Tilth, so I'll spare you the details
15 about Oregon Tilth, as you've already heard
16 from Gwendolyn. But we do want to thank the
17 members of the Committee and the NOP for their
18 notable efforts and progress, and we really
19 appreciate the opportunity to be present and
20 comment and be a part of the process.

21 We have a few comments that echo
22 many that were presented on Monday as well as

1 today. EPA List 4, quickly, not that our bid
2 for urgency will impact the speed of the
3 government, but we do hope that the workable
4 solutions for this issue will be pursued with
5 gusto, as it is very apparent it is needed to
6 help us move forward efficiently and with
7 clarity.

8 Agriculture, we want to thank ACA
9 and industry members for their work. We
10 strongly support the recommendation of the
11 livestock committee and join them in calling
12 on the NOP to implement these standards as
13 soon as possible. Doing so will provide the
14 opportunity and market to the many, many
15 producers seeking to have their products and
16 practices serve as a -- recognized as organic.

17 Animal welfare, with 238 we don't
18 foresee any enforcement changes as mainly due
19 to the fact that we were practicing under what
20 the Chairman referred to as the status quo.
21 However, since the language addition is
22 focused on technical interpretation, it is

1 suggested to include a definition of
2 preventatives along with the rule change.

3 Animal welfare discussion. The
4 inclusion of modern animal husbandry
5 principles and techniques is commendable. We
6 believe it is every livestock producer's
7 desire and best interest to handle animals in
8 a low-stress manner, and that animals' welfare
9 and condition is and should be at the
10 forefront.

11 A few comments with regard to the
12 discussion documents. Will there be an
13 economic assessment analysis conducted
14 regarding the implementation of these
15 proposals as there was with the pasture rule?
16 We believe there needs to be some
17 consideration on the rotation of outdoor
18 access areas with respect to the stocking
19 density, management and requirements. Clarity
20 is requested regarding the acceptable levels
21 of poor body condition, lameness and lesions.
22 It is our opinion that if requirements are

1 proposed for ruminants on physical welfare
2 assessments, similar requirements should be
3 set for all livestock except for bees because
4 I have no idea how body condition score a bee.

5 Speaking of body condition score,
6 if body condition scoring is not required, how
7 can an inspector accurately assess and report
8 on specific number of animals? Specifically,
9 how can an inspector judge less than two or
10 five percent if they are not required to
11 assess a specific number of the whole herd or
12 flock?

13 The science behind the suggestion
14 of maintaining ammonia levels is also
15 understood and appreciated. This is something
16 that our staff and inspectors have already
17 been auditing, assessing and taking
18 enforcement action upon without the specific
19 parameters, however the question with this
20 proposal comes back to audit ability and
21 economic impact. So certifiers would need
22 clear understanding of testing requirements,

1 including documentation required and the
2 responsibility of payment for those tests.

3 The science behind the suggestions
4 that animals in contemporary have a herd/flock
5 mate within visual contact is, again,
6 understood and appreciated. It is common
7 knowledge that herd animals are less stressed
8 and easier to handle quietly and safely in the
9 company of a herd mate. However certifiers
10 will, again, need clear guidance on the
11 documentation required and the audit ability
12 of this requirement.

13 That's all I have. Thank you.

14 MR. GIACOMINI: Question or
15 comments?

16 (No response.)

17 MR. GIACOMINI: Yes, I -- just for
18 clarification, when we came forth with our
19 document from the livestock a couple of years
20 ago on body condition and lesions, Oregon
21 Tilth was one of the most vocally opposed to
22 that action. Has that changed? Does that

1 opinion -- did I understand that you've
2 changed that feeling within your organization?

3 MS. HUSTON-LABBE: Our feeling on
4 animal welfare has not changed. We've always
5 felt that was very important and people should
6 be conducting those. What Oregon Tilth
7 historically has tried to get away from is
8 very specific requirements on practices on the
9 farm level. So the audit ability of counting
10 lesions is not a problem. When it gets down
11 to numbers and estimates and having to assess
12 a whole herd, that just comes down to being
13 prescriptive on management practices as well
14 as the inspection, you know, timeliness and
15 accuracy and those things. So that's been our
16 perspective on those comments. And that has
17 not changed.

18 MR. GIACOMINI: That wasn't quite
19 the way it was expressed in some emails I
20 received from -- so well, maybe it's evolved
21 a little bit.

22 Okay. We appreciate that, though.

1 Okay. We're past where we should -- we're
2 scheduled to take a break. Let's take one
3 now. It is 3:30, 3:45 back in session.
4 Please be prompt.

5 (Whereupon, the above-entitled
6 matter went off the record at 3:31 p.m. and
7 resumed at 3:50 p.m.)

8 MR. GIACOMINI: If the Board
9 members can find their seats, audience,
10 gallery finds their seats, take any -- oh,
11 there's no conversations. You guys are
12 getting so good at this.

13 Joe, we're ready -- the rest of us
14 are ready to start. Bill, you can go ahead,
15 it's only Joe.

16 MR. WOLF: Well, my opening --
17 does this slide? Okay.

18 My opening comment is to say I
19 want to thank the five retiring Board members
20 an the ten that remain. Extraordinary,
21 extraordinary work this last six months.

22 I'm going to address a number of

1 broad issues, and I will point out that there
2 were two public comments that we submitted in
3 great detail to the Board and I hope -- did
4 all of you read those comments? Thank you.

5 I want to cover -- I've got to
6 find out how to run this -- there we go.
7 First of all, just to introduce myself, Wolf,
8 DiMatteo and Associates are strategic
9 consultants in the organic industry. I've
10 been involved with organics since 1971, a
11 broad range of experiences from farming to
12 just about every aspect of organic, including
13 being a pesticide manufacturer at one point.

14 I want to talk about basically
15 some underlying principles that I believe are
16 critical in the decision making here. And the
17 roots of organics in soil, and in soil health,
18 and the principles behind how the world's
19 evolved. This guy, our little earthworm, is
20 really one of the originators of the decision-
21 making process. And I'd like to just bring
22 our earthworm to the table in the process of

1 thinking about some of the decisions we make.
2 We're trying to encourage earthworms and
3 ladybugs and evaluate products in that
4 context. And the criteria for materials
5 decisions, to a great extent, are easy to
6 understand when you think about what's good
7 for them.

8 There's another aspect to the rule
9 that's different from almost any other
10 regulation, and that is that it's not static.
11 It is built around continuous improvement.
12 There are numerous sections of the regs that
13 get involved in continuous improvement.
14 Organic is more than just a no-chemical
15 pesticides or fertilizers, and I think it's
16 really important to think in terms of that --
17 the core underlying principles and not, per
18 se, what we've marketed to the consumer and
19 then respond to that consumer's
20 misunderstanding of the depth of organic in
21 making our decisions.

22 Okay, now my clicker's not

1 working. Next slide, that one. Okay.

2 About continuous improvement, one
3 of the most dramatic factors that's occurring
4 is that we really have not solved problems
5 with how to evaluate and manage commercial
6 availability. And I'd to address three
7 general recommendations that are going to help
8 in decision making about materials. One is,
9 I think it's critical that the public know and
10 the growers and the processors know what
11 commercial availability decisions are being
12 made by ACAs. That process alone will
13 increase the availability and solve the
14 problems as it has, for example, with hops.

15
16 We therefore just simply create a
17 list, have a mechanism where ACAs must report
18 what decisions they make, both around seed and
19 around 606 items. The second, apply organic
20 preference to all non-organic ingredients and
21 merge 605 and 606 as originally envisioned in
22 OFPA.

1 The last point I'd like to make is
2 that we have fewer acres entering organic and
3 that growers and processors are confused
4 because we have a unstable regulatory
5 environment. Four examples at this meeting
6 that would be helpful that we should talk
7 about is uniform certification and
8 enforcement, which the Department is really
9 moving forward with. Renew list for inerts
10 for five years while this new program is being
11 developed and allow a reasonable period for
12 transition to the new program. Allow re-
13 reviewed list for inerts to be used rather
14 than creating a vacuum where nothing can be
15 changed and vote CSL non-synthetic.

16 I appreciate OMRI's comments. I
17 think there's been a lot of new information
18 brought forward and I think that the
19 processing committee of OMRI should have been
20 involved in that original decision.

21 I do want to respect Oliver the
22 earthworm, the USDA's earthworm at the -- at

1 the USDA peoples' garden, and I want to keep
2 him -- keep Oliver happy. So on that note,
3 I'm open to questions.

4 MR. GIACOMINI: Questions? Joe?

5 MR. SMILLIE: Bill, you said
6 something that caught my interest. You said
7 that you thought that OMRI's processing
8 committee should have been involved in that
9 decision, or was that an intended comment?

10 MR. WOLF: Yes, the advisory
11 council was originally structured to have a
12 expertise from throughout all aspects of the
13 community. I was the founding president of
14 the Board of OMRI and was -- served in that
15 role for seven years. And the advisory
16 council was intended to generically look at
17 many of these issues and function to really
18 bring together all kinds of experts from
19 industry, from all across -- across all
20 communities. And the crops committee made the
21 decision to send it to the crop advisory
22 component of the advisory board.

1 None of the members of the
2 advisory board, as I understand it, that were
3 on the -- it's been segregated rather than
4 holistically looked at. And so corn steep
5 liquor is a byproduct of food processing, so
6 the decision about whether it was a synthetic
7 process needed to include food processing
8 experts. So that was the point I was making.
9 And so I -- you know, I respect OMRI's process
10 but I think that there's a lot of new
11 information that's come to light since that
12 decision was made.

13 I think it's also important to
14 understand that some of that is the base.
15 We're triggered by competitive complaints and
16 that we are now embroiled in a debate that
17 doesn't really move us forward as a community.

18 MR. GIACOMINI: Questions,
19 comments? Katrina, did you have something?

20 (No response.)

21 MR. GIACOMINI: Okay, thank you,
22 Bill.

1 Katherine. Kim Keitz, Gwendolyn
2 Wyard next.

3 MS. DiMATTEO: Katherine DiMatteo
4 and I'm the other part of Wolf, DiMatteo and
5 Associates, but we have a third partner also,
6 Sandy Mayes, so we are -- and we have
7 associates also throughout the U.S. that work
8 with us.

9 I want to make very clear that the
10 comments that we did submit that Bill referred
11 to reflect Wolf, DiMatteo and Associates, not
12 as paid consultants for particular clients,
13 but as individuals who work together who have
14 experience, long experience in organic. And
15 it does reflect our own opinions and our
16 perceptions and our wishes for the organic
17 community. And so I just want to credential
18 myself a little bit for those of you who don't
19 know me, and to remind those of you who do,
20 where this comes from in terms of my -- how I
21 look at the things that come before you and
22 come before all of us in the organic

1 community.

2 I started out as a -- in consumer
3 co-ops, I worked 20 years in consumer co-ops.
4 I worked for a Peace and Social Justice
5 organization. I worked for a sustainable
6 energy organization. For 16 years I was the
7 executive director of the Organic Trade
8 Association, I'm currently the president of
9 the International Federation of Organic
10 Agriculture Movements. So there's a deep and
11 broad and diverse background that I bring to
12 thinking about. And my opinions, and our
13 opinions at Wolf DiMatteo and Associates, I
14 also want to say, clarify again, we're not
15 influenced by clients. Rather we sometimes
16 turn down prospective clients because they
17 don't match what we would like to see come out
18 in terms of either inputs or certified organic
19 products or farms or participants in the
20 organic community.

21 So I won't spend much time on corn
22 steep liquor or try to repeat too much of what

1 we wrote in our comments. I do want to just
2 point out that, unlike fish emulsion, corn
3 steep liquor is not developed to be a soil
4 amendment. It is a byproduct of food
5 processing. And I think that must be decided
6 to be a synthetic because it is a byproduct of
7 food processing. It doesn't differ from other
8 byproducts of food processing and the decision
9 for it to be a synthetic would have great and
10 long impact on many, many of the materials
11 that are used in composting in our community
12 today.

13 I also urge you not to put this
14 decision off. I think you've spent a lot of
15 time and with the changing of the guard and
16 thanks to the five retiring members, I think
17 the decision should be taken at this meeting.

18 Tina, thank you for clarifying the
19 posting of the document, I appreciate that.
20 I know we made comment about our concerns, but
21 thank you for taking responsibility for that
22 and explaining it to us.

1 The sunset review recommendations.
2 We're really pleased to hear that the NOP has
3 been in discussion with the EPA and we're
4 really hopeful that the outcome of those
5 discussions provides a practical solution that
6 doesn't overburden the National Organic
7 Standards Board or discourage suppliers from
8 providing organic compliant inputs. I think
9 it's very important that we have a process
10 that moves forward in an orderly way and
11 doesn't disrupt or discourage the development
12 of organic compliance and less toxic products
13 that we can all use in many different ways
14 outside of organic production.

15 In terms of the policy committee,
16 sunset review process and their
17 recommendation, thank you very much to all of
18 the board members for the discussion that you
19 had yesterday. I thought you made great
20 progress and it was a great interchange and --
21 on the optic. And I appreciate the
22 recognition by the policy committee members,

1 that they'll take that back and make some
2 adjustments to ensure -- to make the changes
3 needed to ensure, to allow for public comment
4 on annotations prior to a full NOSB vote.

5 So I just want to read one part
6 from our comment because it's important to me.
7 We realize that a limited list of allowed
8 synthetics is viewed by some as the correct
9 approach to ensure integrity of organic. We
10 disagree and believe it is not the number of
11 items that matters but the compatibility with
12 an organic system that is most important. It
13 is important to keep in mind that there will
14 always both new and experienced farmers and
15 handlers and the use and need for materials as
16 well as the effectiveness of alternatives is
17 dependent on the maturity of the farm or
18 handling operation.

19 Also the fact that an input is
20 synthetic or natural should not be the
21 paramount concern but rather it is the impact
22 on soil, crops, livestock, the environment and

1 human health as well a judicious use that
2 ensures integrity and sustainability of
3 organic systems.

4 Thank you.

5 MR. GIACOMINI: Thank you. Any
6 comments or questions? Katrina?

7 MS. HEINZE: When you were talking
8 about CSL, I thought I heard you say
9 classified as synthetic. And I'm wondering if
10 that was what you meant?

11 MS. DiMATTEO: It was not.
12 Classified as a non-synthetic.

13 MS. HEINZE: Thank you for
14 clearing that up.

15 MS. DiMATTEO: Because it is a
16 food processing waste material.

17 MS. HEINZE: I just wanted to give
18 you the chance.

19 MR. GIACOMINI: Okay. Any other
20 questions, comments?

21 (No response.)

22 MR. GIACOMINI: Okay. Thank you.

1 Tag team champions Kim Keitz, Gwendolyn Wyard,
2 Cameron Wilson and Jim Pierce.

3 MS. KEITZ: We have come out of
4 dormancy. The Material Working Group was
5 founded about three years ago, somewhere
6 around there, really to be an unaffiliated
7 collection of individuals with technical and
8 regulatory background.

9 Participation in the Group was
10 open and available to any interested party.
11 In other words, it was not a function or
12 Organic Trade Association or any other group.
13 It was Gwendolyn and I's mission to make sure
14 that anybody and everybody who wanted to
15 participate could so that we got a very well-
16 rounded group of individuals to -- with their
17 opinions.

18 So again our goal was to offer
19 working papers to the NOSB on the materials
20 issues and the list of individuals that
21 participated or somewhat -- some participated
22 more than others. But that was the group that

1 was on the entire email list there, so to
2 speak. And what we're going to present to you
3 today is really just a summary over the last
4 several years of flow charts on material
5 review. Our charge is just to make sure that
6 we keep in front of you the history of
7 materials and how those things are reviewed.

8 MS. WYARD: Okay, not much time
9 here. Really what I'm about to deliver is a
10 motivational speech, to get the horse in front
11 of the cart and follow a process that involves
12 a decision tree and a narrative that supports
13 that decision tree and a worksheet that can be
14 filled out. And I know that since you're
15 getting beyond all the sunset materials, and
16 you mentioned, Katrina, that this is now going
17 to be a focus, that's really the intent of
18 what I have to say here today.

19 So going back in time, this is the
20 NOSB recommendation of 2005. And in this
21 recommendation, some of the working concepts
22 that were being applied here, this is where

1 the concept -- are you doing that, too, Lisa?

2 MS. BRINES: That doesn't work.

3 MS. WYARD: Okay, I appreciate
4 your support. I wasn't sure who was moving
5 what.

6 So at this point in time, this is
7 where this concept started. I don't think it
8 started here but it certainly was captured
9 here in this recommendation, that as long as
10 the extraction process does not chemically
11 change a substance that's being extracted, as
12 long as a chemical reaction does not occur.
13 This is the idea that contact with a synthetic
14 substance, a processing aid, would not render
15 it synthetic unless a chemical change occurs.

16 The NOSB at this point spent a lot
17 of time, they put together a chemistry 101
18 paper and they really delved into what would
19 constitute a chemical change and exactly what
20 they meant by chemical change. So coming down
21 here, this -- that recommendation went on to
22 the NOP, and then the NOP, I believed they

1 hired another organization to put together a
2 document which is referred to as the NOP
3 framework. And this is the decision tree of
4 '06. And basically they took the --
5 everything that the NOSB had in their
6 recommendation and they cleaned it up and they
7 made suggestions to make -- to help it make
8 more sense. And they put this decision tree
9 together.

10 And the Material Working Group
11 then came along and we looked at this decision
12 tree and we spent a time, quite a bit of time,
13 the group that you saw up there, improving
14 this decision tree. So yet another decision
15 tree was created. And the decision tree is
16 what was presented to the NOSB. Our document
17 was dated 4/20 of '09. And it basically took
18 a lot of very, very good information that was
19 put together in the NOP framework. We adopted
20 almost everything in that document related to
21 synthetic/non-synthetic and put it into our
22 document.

1 I'm going to interject just a --
2 this next slide just to demonstrate. I'm
3 taking the liberty of bringing in something
4 that Oregon Tilth created. Simply as a
5 demonstration, what this is responding to is
6 the NOP response to the Board. What a
7 decision tree might look like if you were to
8 separate out agricultural and non-agricultural
9 from synthetic and non-synthetic. So as you
10 move ahead and you put your decision tree
11 together, we very much recommend, you know,
12 that the response from the NOP can be set up
13 this way where, right from the very beginning,
14 you ask, what are we dealing with? A crop
15 input, a livestock input, processing input.
16 So that's just sort of the starting map.

17 Now the first decision tree that
18 we presented to you, we did not include a
19 question about significant levels, because we
20 couldn't come up with very good, clear
21 criteria of what a significant level would be.
22 So we left that out. That has become very

1 much a part of the discussion and we think
2 rightly so, and that was definitely very much
3 a part of the 2005 NOSB recommendation as well
4 as the NOP framework.

5 So when you're looking at the
6 decision tree that the Material Working Group
7 submitted, here's -- we're going into examples
8 -- I'll just quickly wrap up -- these are
9 worksheets that you have to use, tools that
10 you can use. And make sure when you put these
11 worksheets together that you include -- and
12 this is information from the Material Working
13 Group document -- an explanation that goes
14 behind the definitions. These explanations
15 here didn't make it into your April
16 recommendation. You brought forward the
17 definitions, such as chemical change, but
18 there's very clear criteria that, you know,
19 gets into the explanation of what that means.
20 And that's very helpful. And you can read
21 through this document here and see how
22 incredibly helpful these types of

1 considerations would be to a determination of
2 corn steep liquor, for example.

3 Thank you very much.

4 MR. GIACOMINI: Question, Katrina.

5 MS. HEINZE: I wanted to thank you
6 for that summary and for the reminder. The
7 Fall 2009 document did adopt most of what the
8 Material Working Group recommended, and it
9 does have a sentence in there that, for a full
10 explanation of the thought process on how to
11 include -- apply the definitions, you do need
12 to look at the Material Working Group
13 document. So I do appreciate that reminder,
14 Gwendolyn.

15 MR. GIACOMINI: Further questions,
16 comments?

17 (No response.)

18 MR. GIACOMINI: Kim, you -- I'd
19 like to ask you a question. You were Material
20 chair for a number of years, you co-chaired
21 the working group. You showed the different
22 trees, the framework tree which is almost

1 exactly the same as the OMRI tree that we gave
2 us, you showed us the other tree of
3 alternatives. Without getting into the
4 specific -- I'm not asking you whether you
5 think corn steep liquor is synthetic or non-
6 synthetic, and I'm hoping you won't have to
7 answer it from that perspective. Can you give
8 any of the Board members who are -- have for
9 whatever reason -- who are still looking -- as
10 we are still looking at this, so I'm going to
11 say everybody -- no one has fully decided, can
12 you give us any insight, recommendations, very
13 briefly on dealing with this issue? It's
14 complicated, it's that .1, .3 percent whatever
15 that's a problem.

16 MS. KEITZ: You know, it's painful
17 sitting out in the audience watching you guys
18 go through this because I know it's very tough
19 decisions that you have to make. I suppose my
20 advice would be that, you know, again, use the
21 tools that you've got in front of you. It's
22 your charge as a Board to make the best choice

1 that you can at the end of the day. It's --
2 you know, I see two sides. You've got
3 scientists saying this and scientists saying
4 that. Again, at the end of the day, you've
5 got to make the best balanced choice with
6 that.

7 You know, I do -- I disagree with
8 the statement made earlier that you have to
9 just make a synthetic or non-synthetic
10 decision. I think you do have to look at
11 evaluation criteria. You know, you have to
12 take -- you have to look at this material as
13 a whole, you know, and if you're on the fence
14 on something, I think you need to defer to,
15 you know, what you think is best for the
16 industry and for the material. I guess that
17 would be my advice to you.

18 MR. GIACOMINI: Katrina?

19 MS. HEINZE: I should have asked
20 earlier, are you guys around tomorrow?

21 MS. WYARD: Yes.

22 MS. KEITZ: Yes.

1 MS. HEINZE: Okay, thank you.

2 MR. GIACOMINI: Further questions?

3 (No reponse.)

4 MR. GIACOMINI: Okay.

5 MS. WYARD: Thank you.

6 MR. GIACOMINI: Thank you.

7 Cameron Wilson?

8 MR. WILSON: Yes.

9 MR. GIACOMINI: And Jim Pierce and
10 Cameron Wilson.

11 MR. WILSON: Me again. So I'm not
12 sure if I shift over there later, but --

13 MR. GIACOMINI: No, actually you
14 stay at the podium.

15 MR. WILSON: Okay, all right.

16 I'm going to talk about EDDS which
17 is a urgent matter we petitioned to the NOSB.

18 I work for a company called Neudorff.

19 Neudorff, German-based, family-owned company,

20 specializes in the development of natural

21 pesticides. Many of the products that we have

22 are NOP and OMRI compliant. We've petitioned

1 the NOSB to add the biodegradable chelater at
2 EDDS to be allowed as an inert and pesticide
3 used in organic production. EDDS represents
4 the next generation of chelaters and was
5 developed to replace synthetic chelaters which
6 are currently on the August 2004 list of
7 inerts of minimal concern. EDDS, if improved,
8 would result in less synthetic chelaters being
9 put into the environment and our food system.

10 Many industries in Europe have
11 already embraced the use of EDDS to replace
12 synthetic chelaters due to the concerns
13 surrounding the synethetics. EDDS is used in
14 organic agriculture in Europe today. In
15 Switzerland, the FiBL organization has
16 approved EDDS for use in organic production
17 and most recently received verbal approval
18 from ECOCERT for the use of EDDS. We kindly
19 ask the NOSB to do the same.

20 NOSB recommended not to allow EDDS
21 to be added to the National List based on the
22 perceived lack of need to do available

1 alternatives, the organic compatibility to
2 agriculture and the lack of detailed
3 information regarding the potential
4 environmental health and impacts to the
5 manufacturing process. When we first received
6 the TAP review, our first reaction was, it
7 looks like this was reviewed as an active
8 ingredient. That was our first impression.
9 And still we went through the process of
10 responding, however we believe that it was put
11 into a process that looked at it as an active
12 ingredient, and we believe that the process is
13 flawed and it has to be looked at in a
14 different way because it is an inert.

15 I'm going to go on and state a
16 couple of reasons why I feel EDDS is
17 important, but I will -- I want to say my
18 summary first in case I get cut off. It's
19 that we ask the NOSB to defer the vote on EDDS
20 until the NOP, USDA and EPA collaborate on the
21 review process for inerts.

22 So let me go through now and

1 explain why we believe EDDS is important.

2 There is a need for chelaters and pesticide
3 formulations used in organic production.

4 Chelaters are commonly used inert ingredients
5 and are essential to the shelf stability of
6 pesticide formulations. Without their use,
7 less inputs would be available to organic
8 farmers. This would result in higher food
9 cost to the end user.

10 Metal ions introduced during the
11 manufacturing and packaging process will
12 oxidize both active and inert ingredients in
13 pesticide formulations rendering them less
14 stable and less efficacious. As mentioned,
15 less biodegradable synthetic chelaters are
16 currently on EPA's list 4(b) and allowed in
17 pesticides for organic production. These
18 chelaters are considered old chemistry and
19 have been replaced in many industries in
20 Europe with biodegradable chelaters such as
21 EDDS.

22 We have requests from U.S.

1 customers to formulate with biodegradable
2 inerts such as EDDS and to stop using
3 synthetics. In Europe, EDDS is widely used in
4 a variety of high-volume industries because of
5 its excellent environmental profile. Some of
6 the diverse applications that EDDS has
7 replaced less biodegradable chelaters are
8 laundry detergents, surface cleaners, personal
9 care products, bleaching, photographic
10 development and agriculture, pest control
11 products and foliar fertilizers.

12 EDDS is compatible with organic
13 agriculture. EDDS is naturally occurring and
14 produced by soil microorganisms. EDDS is
15 already present in the ecosystem and the
16 mechanism for its utilization and degradation
17 by soil microbes are also present. EDDS is
18 completely and quickly mineralized by microbes
19 into carbon dioxide, water and ammonia. The
20 biodegradable nature of this compound led to
21 the Manufacturer Award and The Green Chemistry
22 Award in the U.K. and allowed for EDDS to

1 obtain several European eco-label approvals.

2 EDDS has no adverse effects on
3 human, animals or the environment. EDDS is
4 considered of low toxicity to human by the EPA
5 and approved for use in food-contacting paper
6 products by the FDA. There will be no adverse
7 effects to people or animals when used as an
8 inert ingredient in pesticide formulations.

9 The toxicity to EDDS has been tested on a
10 variety of non-target organisms such as
11 earthworms, dafnia, algea and fish and found
12 to be nontoxic at the concentrations well
13 above what would reasonably we would expect to
14 be using it at in inerts and pesticides.

15 As EDDS is naturally occurring and
16 rapidly and completely biodegradable, there
17 will be no adverse environmental impact. The
18 manufacture of EDDS does not pose a risk. One
19 of the things identified in the TAP was the
20 manufacturing process -- I'll finish up. The
21 process uses a compound dibromide ethane.
22 It's carefully controlled in the production

1 method and contained and the product EDDS does
2 not contain any dibromide ethane.

3 So --

4 MR. GIACOMINI: Thank you. Any --

5 MR. WILSON: -- I'll summarize and
6 say --

7 MR. GIACOMINI: Okay.

8 MR. WILSON: -- it's already being
9 used in Europe in organic products. And
10 again, just to reiterate, we ask the NOSB to
11 defer the vote until the process is
12 collaborated.

13 Thank you.

14 MR. GIACOMINI: Joe?

15 MR. SMILLIE: I've got a lot
16 respect for FiBL. They are a very well-known
17 organization and do a good job. That's a very
18 good sign. I think that a request for
19 deferral until we've got the proper process
20 for judging these is an appropriate request.

21 MR. GIACOMINI: Crops Committee,
22 does that satisfy the request that you made

1 regarding these -- the substances?

2 MS. ELLOR: It absolutely does.

3 In fact, we got together this morning as a
4 Crops Committee and certainly we're willing to
5 defer it until the next meeting. And we're
6 certainly willing to defer it until the
7 process is-- the complete collaborative
8 process is up and running. So thank you so
9 much for coming.

10 MR. WILSON: Thank you.

11 MR. GIACOMINI: Thank you very
12 much.

13 MR. PIERCE: Mr. Wilson, would it
14 be easier for you to do your other
15 presentation now and --

16 MR. GIACOMINI: No, we're not
17 doing that.

18 MR. PIERCE: And Mr. Chairman and
19 Ms. Secretary --

20 MR. GIACOMINI: Jim Pierce,
21 Cameron again and then Lisa.

22 MR. PIERCE: A slight request. I

1 should be able to finish my comments in about
2 four minutes, at which point I'll take
3 questions and then, if possible, I'd like to
4 use my last minute to make you smile.

5 MR. GIACOMINI: You're not going
6 to let us smile for four minutes?

7 MR. PIERCE: Not like that. So if
8 you'll just start the clock please and then
9 give me one more minute. All right.

10 I'm Jim Pierce from Oregon Tilth,
11 the best certifier. For the record, these
12 comments are on behalf of Oregon Tilth and/or
13 myself and are not intended to advocate for
14 any of our fine clients.

15 Most of you know from previous
16 testimonials that my particular brand of
17 organic zeal is as a lumper not a splitter and
18 as a staunch standards conservative but an
19 out-of-the closet materials liberal. You are
20 about to draw a line somewhere between hair
21 and fish.

22 OFPA 65.17 addressing the National

1 List is simultaneously verbose and vague on
2 organic -- on synthetic materials, but it is
3 clear that there is to be a list of allowed
4 synthetic materials. And by my read, the crux
5 of the assessment would be (c)(1)(A)(iii) that
6 the use of materials is consistent with
7 organic farming and handling.

8 As you debate and complete the
9 criteria information forms, please do so in
10 the spirit of previous Boards by weighing the
11 impacts against outcome benefits. In the
12 spirit of my NOSB mentor, George Siemon, also
13 ask who dies? Nothing, including organic
14 farming and convening an NOSB meeting is zero
15 impact. As Jeff Moore astutely noted
16 yesterday, Monday, if the weather turns icy
17 cold tomorrow, the environmental impact of
18 your decision to ban propylene glycol from
19 arguably compatible organic input would be
20 eclipsed manyfold as your plane is deiced.
21 Irony? Yes, you bet ya, as they say here in
22 God's country.

1 You need to draw a clear bright
2 line between synthetic and non-synthetic but
3 not here. If you decide that corn meal, corn
4 starch and corn oil, and as a byproduct corn
5 steep liquor are synthetic because of the
6 process, and regardless of the outcome, you
7 will certainly have set a precedent for a high
8 bar for organic integrity but you will have
9 done a disservice to the future of the
10 entrepreneurial spirit as well as future NOSB
11 Boards which will have to struggle with the
12 impact of your decision.

13 Now, before I lunge headlong into
14 the next lane of traffic, let me repeat that
15 I'm not advocating on behalf of any of our
16 fine clients, which include both the Montague
17 Hop Growers and the Capulet Breweries.

18 Maybe you realize it, but if not
19 here's the verbal two-by-four. Hops, like
20 flavors, colors and soon hopefully yeast is
21 not about listing or delisting, it's about
22 commercial availability. Monday we learned

1 that 99 percent of hops are contracted, and
2 although the Montagues are sitting on 80,000-
3 plus pounds of inventory, the Capulets seem to
4 be not only avoiding forward contracting for
5 those hops but by specing their way around
6 losing what's available. Shame on them and
7 shame on us, the certifiers, for not settling
8 this feud. Mr. Murray, dude, we blew it. Not
9 so good. That is all.

10 Or is it? Transcripts will show
11 that somewhere in these rants I address the
12 NOP, and that would be now. Please prioritize
13 commercial availability guidance based on the
14 2007 and 2008 NOSB recommendations, including
15 language on proactive measures which would
16 include forward contracting. Doing so will
17 allow your agents, us the certifiers, to
18 universally apply considerably more pressure
19 on farmers and handlers to increase the use of
20 organic seeds and ingredients. Without such
21 guidance, we will continue to struggle with
22 hop-like commercial availability abuse with

1 other ingredients such as flavors, colors,
2 corn starch and very soon, hopefully yes,
3 yeast.

4 In closing for the record, I love
5 babies. And I love beer -- and I love beer.
6 This is critically important. You're on the
7 right track, good work and Godspeed.

8 MR. GIACOMINI: Okay. Now --

9 MR. PIERCE: Questions?

10 MR. GIACOMINI: Questions.

11 Questions. I think you've just eliminated the
12 possibility of any questions.

13 MR. PIERCE: Well, we'll see if
14 this is in tune, but I'm not really thinking
15 it's important. My G-string seems a little
16 tight, but I'll get over it.

17 MR. PIERCE: (Sings a song.)

18 MR. GIACOMINI: Don't know why you
19 didn't include that in the regular part of
20 your comments. That's absolutely precious.

21 Kevin, you have a question about -

22 -

1 MR. ENGELBERT: I'm just so
2 pleased that I'll have a memory for my last
3 memory from my last meeting that I'll never
4 forget.

5 MR. GIACOMINI: Okay. You offered
6 Cameron to go ahead of you, and now I
7 understand why.

8 MR. PIERCE: That's a tough act to
9 follow. I should have brought the bagpipes.

10 MR. GIACOMINI: Cameron, Lisa and
11 Michael Brandt.

12 MR. WILSON: So I'm going to talk
13 a little bit about the EPA list for inerts.
14 Recommendation by the NOSB was to extend the
15 list for five more years. Neudorff supports
16 the relisting of EPA's list 4(a) and (b)
17 inerts for five more years. We disagree that
18 -- with the minority opinion that three years
19 is sufficient time period for review of the
20 list four inerts.

21 Neudorff is a 156-year-old
22 company. Despite our small size, Neudorff is

1 recognized worldwide as a leader in developing
2 pesticides for organic production. We rely on
3 our decades of experience and knowledge rather
4 than large research budgets that would enable
5 faster formulation and reformulation work.

6 Removal of the some of the current inerts
7 allowed in organic inputs in five years would
8 put smaller companies, such as ourselves, at
9 a disadvantage. Our research group is less
10 than ten people.

11 We have spent a considerable
12 amount of time and money developing,
13 patenting, registering and marketing our
14 intellectual property based on the current
15 allowable inerts. Losing these inerts without
16 enough lead time would jeopardize the future
17 of our business in the U.S. It would also
18 result in less inputs for organic growers
19 resulting in potentially less yields,
20 resulting in higher prices to the end user.
21 This seems to contradict the spirit of the
22 organic movement.

1 We understand the need for the
2 NOSB to continue to revise and improve the
3 list of materials allowed for use in organic
4 agriculture. We support the continued use of
5 the EPA's list 4(a) -- 4(a) and 4)b) inerts to
6 allow a thorough review of chemistry and
7 toxicology in these inerts. Developing stable
8 efficacious products specifically for the
9 organic sector and formulation changes
10 resulting in regulatory changes takes years to
11 effect. We urge the NOSB to provide enough
12 lead time when the inerts list does change.

13 One of the features of natural
14 active ingredients is that they typically
15 break down readily. With organic pesticide
16 formulations, the inert ingredients are
17 especially important. They need to stabilize
18 the active ingredients effectively in the end-
19 use product. For this reason, formulation and
20 reformulation of pesticides that continue to
21 have natural ingredients is difficult and time
22 consuming. Once a formula is determined to be

1 efficacious, stability must be confirmed.

2 The EPA, for example, requires one
3 year storage stability studies. The EPA and
4 Cal EPA must review and approve new formulas.
5 OMRI must approve new formulas. For this
6 entire process, R&D companies such as
7 Neudorff, require a minimum of four to five
8 years notice of any changes to the list of
9 allowed inerts to prevent this disruption to
10 growers.

11 Neudorff supports the NOSB's
12 recommendation of relisting the current EPA's
13 list 4(a) and (b) inerts for five more years.
14 Anything else will result in fewer inputs
15 available to the organic farmers, putting
16 their business at a disadvantage.

17 And I just wanted to ask one
18 question. Does the NOSB recommendation
19 include list four inerts that were added after
20 August 2004? Because there were -- there were
21 inerts that were petitioned, that were added
22 to list 4 and then they were actually

1 disallowed.

2 MR. McEVOY: Well, I can't speak
3 for the NOSB recommendation, but I can speak
4 for the list 4 materials that were added after
5 September of -- what was that -- '04 -- August
6 2004 that are not included in the list of
7 approved substances.

8 MR. WILSON: Okay. Just maybe
9 this is a silly question, but what was the
10 logic? Is that they picked the August 2004
11 list, they took some ingredients off, they put
12 the -- other ones were petitioned after that
13 to go on, and then those were disallowed. I'm
14 just trying to understand the logic behind
15 that. We got caught up in it a little bit,
16 and we were able to clean it up. But it was
17 a bit of a tricky situation.

18 MS. BROWN-ROSEN: Emily Brown-
19 Rosen.

20 It had to do with EPA's
21 procedures. They -- and they were reassessing
22 the tolerance for all those inerts. And

1 initially they started handing out letters and
2 claiming they were going to update list 4, so
3 various certifiers and OMRI accepted them.
4 But then they finalized their process and
5 announced they were not going to update list
6 4, and it kind of left those inerts in limbo.
7 So NOP issued a new policy clarifying how
8 we're going to use the obsolete list and we're
9 really going to have to rely on the old -- you
10 know, the actual published list. So it's a
11 problem. That's why we need to go forward and
12 deal with this further.

13 MR. WILSON: Okay, thank you.

14 MR. GIACOMINI: Is that --

15 MR. WILSON: Well, that was my
16 question.

17 MR. GIACOMINI: Do you have any
18 more -- anything else?

19 MR. WILSON: I was going to ask
20 you that.

21 MR. GIACOMINI: Okay. Any
22 questions or comments?

1 (No response.)

2 MR. GIACOMINI: Okay, thank you.

3 MR. WILSON: Thank you very much.

4 MR. GIACOMINI: Lisa, Michael
5 Brandt and Karreman. Go ahead.

6 MS. BUNIN: Good afternoon. My
7 name is Lisa Bunin and I'm the organic policy
8 coordinator at the Center for Food Safety.
9 CFS is a non-profit member organization that
10 works to protect human health and the
11 environment by curbing the proliferation of
12 harmful food production technologies and by
13 promoting organic and other forms of
14 sustainable agriculture.

15 Today I'm also representing CFS's
16 sister organization, the International Center
17 for Technology Assessment, a non-profit
18 organization dedicated to providing the public
19 with full assessments and analysis of the
20 impacts of food-related technologies on
21 society.

22 My remarks today will focus on

1 nanotechnology, but first I want to briefly
2 comment on corn steep liquor in light of the
3 Board's discussion yesterday. Although we
4 believe that corn steep liquor meets the
5 definition of synthetic because it is
6 manufactured by a chemical process, we
7 strongly urge the Board to postpone your
8 decision. We urge more investigation and
9 research due to the confusion surrounding the
10 fundamental chemistry. What's at stake is far
11 reaching and therefore the decision should not
12 be made without clear Board agreement and
13 consensus on such a core definition.

14 Okay. On to nano. CFS and ICTA
15 are pleased to see the recognition by the
16 materials committee that there is overwhelming
17 agreement within the organic industry to
18 prohibit nano technology in organic production
19 and processing at this time. We
20 wholeheartedly support the prohibition of nano
21 technology and nano materials in organic, and
22 so do 8,320 of our individual supporters who

1 wrote to this NOSB urging it to take immediate
2 action to protect the integrity of organic by
3 keeping nano out.

4 CFS and ICTA support the materials
5 committee's proposed definition of engineered
6 materials and its' acknowledgment that the
7 unique functions and properties of materials
8 at the nano scale could harm animals, humans
9 and the environment. We also support
10 excluding traditional food processing
11 technologies and naturally-occurring nano
12 particles which clearly differ from those that
13 are deliberately manufactured. We agree with
14 the committee's conclusion that deliberately
15 engineered materials are synthetic. It does
16 not matter whether the bulk -- original bulk
17 material comes from a natural source because
18 once materials are manipulated at the
19 nanoscale, the chemical and physical changes
20 that result render it a non-agricultural
21 synthetic material.

22 We do not support allowing

1 individual nano materials to be petitioned for
2 placement on the National List on a case-by-
3 case basis. Nanotechnology, like genetic
4 engineering, irradiation and sewage sludge is
5 antithetical to the letter and intent of OFPA
6 which limits the use of synthetics in the
7 production and handling of organic products.
8 Synthetics are intended to be the exception
9 rather than the rule.

10 To reinforce this intent, OFPA and
11 the organic rules state that, if the substance
12 is allowed on the National List, it must not
13 be harmful to human health or the environment.
14 Nanomaterials cannot meet the standard due to
15 the many documented risks of harm that we have
16 presented in our current and previous written
17 testimony to the Board. We strongly urge the
18 Board at this meeting to recommend a complete
19 prohibition of nanotechnology in organic
20 production and handling without any exceptions
21 or caveats, but adding it to Section 205.105
22 of the Rule in a new letter (h).

1 Packaging is a predominant product
2 category where food-related nanotechnologies
3 are being deployed to extend a product's shelf
4 life, particularly through the use of anti-
5 microbials like nanosilver. This type of nano
6 packaging is designed as a delivery system
7 whereby the nano particles are embedded in the
8 packaging act as a preservative, anti-
9 microbial or anti-fungal, among other things.
10 As such, we believe that the authority already
11 exists within the organic rule to prohibit
12 nano in packaging in Section 205.272(b)(1).
13 The rule states that packaging materials and
14 starched containers are bins that contain a
15 synthetic fungicide, preservative or fumigant
16 are prohibited for use in the handling of any
17 organically-produced agriculture product and
18 ingredient.

19 CFS and ICTA disagrees with the
20 recommendation to delay making a permanent
21 decision to prohibit nano in organic and
22 instead hold a symposium. There is sufficient

1 evidence today about the environmental and
2 health risks of nano to conclude that it
3 contravenes the principles of organic and that
4 it needs to be prohibited. Failure to take
5 immediate action in the face of growing and
6 unregulated industry threatens to undermine
7 both the integrity of organic products, the
8 consumer confidence in the USDA seal.

9 In conclusion, when it comes to
10 nano in organic, we believe that a firewall
11 should be built without a door.

12 Thank you.

13 MR. GIACOMINI: Questions? Tracy?

14 MS. MIEDEMA: Lisa, I'm going to
15 ask the program a question based on what you
16 just said. We know that we created a problem
17 for you all with cloning and how we took a
18 very strong stand that was very hard to take
19 action on. At least that's our -- what we've
20 kind of gathered. What is or what would be
21 the most actionable stance that the NOSB could
22 take to prohibit nano?

1 MR. McEVOY: Well the cloning
2 recommendation that you made, we issued a
3 policy statement on that that cloning is not
4 compatible with organic production. So the
5 part that we couldn't take on was the part of
6 the recommendation to prohibit the progeny of
7 cloned animals. It's also prohibited because
8 that's not specifically outlined in the
9 current regulations. So I wouldn't
10 necessarily say you caused a problem. We took
11 your recommendation and did the best we could
12 with what we could through a policy memo. And
13 then, in terms of additional work on the
14 progeny piece, that would have to be done
15 through rule making.

16 In terms of your nanotechnology
17 recommendation, when there's a final
18 recommendation -- we've worked with you in
19 terms of the development of the
20 recommendation, but when you have a final
21 recommendation, we'll look at that and we'll
22 see how we can move towards implementing the

1 NOSB's recommendation. So it's hard to say
2 specifically what's the best recommendation
3 for us to have to move forward. It sounds
4 like the intent is that you want to prohibit
5 nanotechnology and we'll take that and see
6 what's the best way to move forward on that.

7 MR. GIACOMINI: Thank you. Yes,
8 we've certainly heard over the past year, as
9 we said before, with all the caveats of the
10 confusion around it, that no one wants nano in
11 organic, including at one point in time the
12 people, the 1,655 people who responded to my
13 personal email being posted on a web site to
14 respond to whether they wanted nano in
15 organic. So we -- I know I certainly heard it
16 in those 20 hours when I was -- before I was
17 able to get that web site changed. So --

18 And next up is Michael Brandt,
19 Hugh Karreman and Wendy Buckwalter.

20 MR. BRANDT: Good afternoon. My
21 name's Mike Brandt. My connection to the
22 organic industry is primarily that of a

1 consumer. I haven't been with you for what is
2 now almost three days of hearing so I don't
3 know what may have transpired. I'm not
4 wishing to waste anyone's time. The first
5 thing I need to ask is, is the topic of
6 henhouse porches, as relates to outdoor access
7 for laying hens, is this still a relevant
8 topic for addressing the board? Great.

9 I live in Arena, Wisconsin in
10 what's known geologically as the driftless
11 area. Our region is characterized by wooded
12 hills that are scoured with deep valleys,
13 hollows and coolies, therefore mostly
14 unsuitable for large-scale agriculture. One
15 could always raise cattle there and grow
16 enough feed for them, so for a long time the
17 driftless area was dominated by family-run
18 dairy farms.

19 During the past 50 years,
20 industrialization of the dairy industry has
21 made it increasingly difficult for small
22 operators to survive on conventional product.

1 That a viable, even growing dairy business
2 remains in the driftless area can be credited
3 to one thing more than any other, it's the
4 organic brand. The organic brand represents
5 the margins needed to support small scale
6 family farms. The evidence of this is
7 everywhere throughout the driftless portions
8 of Wisconsin, Minnesota, Iowa and Illinois and
9 has come to encompass not only dairy products
10 but meat, wool, fruits, vegetables, poultry
11 and, yes, eggs. Hundreds if not thousands of
12 producers in this region are in business, can
13 only be in business, in fact, because of what
14 the organic brand represents to consumers.

15 For over 35 years, my wife and I
16 have gone out of our way to find and purchase
17 organic product. We've done so for a variety
18 of reasons, including nutrition, environmental
19 impact, the humane treatment of livestock.
20 It's only been within the last decade or so
21 that we've come to appreciate the ways in
22 which the organic brand serves to support the

1 health of our local economy and the farm
2 families who contribute to it.

3 We buy our eggs and chickens from
4 a neighbor who's certified organic. They and
5 their young children also milk cows. When I
6 drive past their farm, I can see the chickens
7 in the field, I know they're getting exercise,
8 I know they're getting fresh air, I know
9 they're supplementing their feed with things
10 that they're scratching out of the ground.
11 What everyone in this room knows is that the
12 scene I just described is exactly what the
13 consumer imagines when he or she looks at the
14 word organic.

15 The image of thousands of chickens
16 crammed together, whether it be in an enclosed
17 warehouse or on a concrete floored porch, that
18 bursts the bubble. That is not what people
19 think they're paying for. And it serves in
20 the mind of the consumer to degrade the
21 organic brand down to just another phony-
22 baloney gimmick. And that will not enable

1 families like my neighbors to support
2 themselves on a small farm.

3 I'm here today both as a consumer
4 and as a concerned member of an agricultural
5 community to remind members of the NOSB that
6 the value of the organic brand has everything
7 to do with matching the expectations of the
8 consumer with the realities on the farm. In
9 that context, eggs that come from a chicken
10 that never sees the light of day are not
11 organic eggs, and people will not knowingly
12 pay an organic premium for them.

13 I therefore appeal to you to
14 recognize hen house porches for the sham that
15 they are and submit to the National Organic
16 Program new rules excluding porches as a means
17 of satisfying outdoor access requirements.
18 Large producers who do not choose to comply
19 with reasonable organic standards have other
20 avenues for differentiating their product and
21 increasing their margins. To allow them to do
22 so by degrading the organic brand is a

1 disservice to the consumer, like myself, as
2 well as to my neighbors and the larger
3 community of driftless area organic farmers.
4 Thanks.

5 MR. GIACOMINI: Questions and
6 comments?

7 (No response.)

8 MR. GIACOMINI: Thank you.

9 Hugh Karreman, Wendy Buckwalter
10 and Jonathan Woolick -- Jonathan.

11 MR. KARREMAN: Good afternoon,
12 folks, glad to be back up here. It feels nice
13 to be near you but not stuck in those seats.
14 I'm Hugh Karreman, former Board member, near
15 my livestock folks here, and just
16 congratulations to the graduating class. Well
17 done Kevin and Jeff and whoever all else. I
18 still get a little nervous up here as I used
19 to before I was on the Board.

20 So anyway, I just wanted -- I have
21 a few thoughts here, I don't know how long it
22 will take. Less than five minutes though,

1 okay.

2 So last night I gave a talk at the
3 veterinary school here in Wisconsin, here in
4 Madison. It's about 40 students, to the
5 Integrative Medicine Club which about three-
6 quarters of them were dairy-oriented. Well,
7 we're in Wisconsin, so that makes sense. And
8 I invited them to come here if they had any
9 spare time, to watch democracy in action,
10 which this totally is and it's wonderful.
11 They had a lot of questions throughout my talk
12 -- of course, I'm talking about organic dairy
13 cows, having been immersed in this 15, 20
14 years now. And they had questions which were
15 pretty difficult to answer and -- such as, why
16 is Ivermectin allowed in dairy stock but not
17 beef, or why does the EU and Canada allow
18 antibiotics and the U.S. doesn't? Those kind
19 of questions.

20 And my answer to them, generally
21 to any group, is that the organic industry,
22 just like the other gentleman said, is very

1 consumer driven and you have to listen to the
2 consumers. And because they're paying the
3 premiums to the farmers, okay? So when you're
4 talking about, I don't know, corn steep
5 liquor, and you guys are getting into what I
6 would call the realm of the absurd, think
7 about what the organic consumer would think
8 about just the big picture of what you're
9 talking about.

10 So I mean, on that corn steep
11 liquor, the thing I would say, I would sit on
12 the that it's a non-synthetic type thing, or
13 hold your vote, whatever, okay? Don't make
14 the song come true that Jim so nicely sang.

15 Anyhow, on some other things,
16 239(c)(2), I agree with your recommendation,
17 I also agree with Harriet Behar's addition
18 that there needs to be a note that materials
19 need to be on 603 and/or in compliance with
20 organic standards, otherwise some non-listed
21 items might be used as preventives. Okay, so
22 you just have to make that extra statement

1 that it's got to be in compliance with
2 organics in the list.

3 In animal welfare, I agree with
4 the outcome-oriented stance, but always keep
5 in mind that whatever resembles a factory-type
6 farm, where a completely-enclosed facility
7 will create at some point a black eye for the
8 industry. And I agree with the person from,
9 I think it was Coleman, who said that the
10 organic label should say all so they don't
11 have three or four different labels that add
12 it's humanely raised and this and that.

13 Don't forget that the organic
14 system, we use no sprays and that's why I
15 really, really love organics. There's no
16 herbicides, pesticides, fungicides,
17 insecticides sprayed into the environment.
18 And those humane stickers can't say that, or
19 they don't, as far as I know. The organic
20 sticker does. So the organic sticker also
21 should have that humane aspect in it, just
22 keep it in mind for the consumer so it's not

1 so confusing for them, so they can have it all
2 in that one seal.

3 Natural behavior, definitely
4 critical to animal welfare and is a function
5 of being in their natural environment, not
6 sawdust on wood flooring as a proxy for real
7 outside living. Sawdust on wood flooring or
8 concrete is pseudo-natural behavior -- that
9 allows for pseudo-natural behavior.

10 Poultry houses. Has anyone asked
11 if the land that they sit on is certified
12 organic? I know one place in Pennsylvania
13 where it is not. It's a certified organic
14 poultry house, the land on it, under it and
15 everything is not certified organic. That's
16 a big question.

17 Let's see. Methionine. I think
18 there needs to be a regulatory change to allow
19 poultry to express their natural behavior by
20 being omnivores and not herbivores. That's a
21 forced condition. And it's a shame that
22 methionine, as a residual, the cheapest way to

1 feed totally confined conventional poultry.
2 Origin of livestock, poultry should be also
3 made to be organic from whatever the
4 equivalent is to the last sort of gestation
5 and not just one day of live when they're
6 given a variety of things on that first day.
7 Mammals have -- mammal-type things have to be
8 -- last through gestation, so should poultry.

9 Vaccines, there's a lot of genetic
10 -- not a lot, there's some genetically-
11 engineered vaccines, there's 24 in existence
12 with about 11 labeled for poultry. Are they
13 being used?

14 Ending thoughts, I would just say
15 is that, always keep in mind what the organic
16 consumer would think if they were standing
17 wherever you are in the organic industry in
18 real time outside on a farm, what they would
19 think if they were standing there right then
20 and there. Can you explain what is happening,
21 would they accept it? Because they're the
22 ones paying the premiums. So anyway, thanks.

1 MR. GIACOMINI: Questions and
2 comments?

3 (No response.)

4 MR. GIACOMINI: Okay. Oh, wait, I
5 do, Hugh. Back up, please. Could you give us
6 -- we've got a number of other documents that
7 we're working on, hopefully what we need to do
8 on 238(c)(2). Could you give us some specific
9 -- you can just write it down on a piece of
10 paper and hand it to us later for us to
11 consider tonight, the specific changes you'd
12 like to see us consider on that?

13 MR. KARREMAN: Sure.

14 MR. GIACOMINI: Also on -- an on
15 the poultry, the issue of the one-day-old
16 chicks being organic is something that we've
17 grappled with forever. Unfortunately that's
18 the way OFPA wrote it. And unless, you know -
19 - so as the former Deputy Administrator of the
20 program -- no, I guess you would -- anyway,
21 Barbara, whatever her highest title was,
22 Congress trumps.

1 MR. KARREMAN: Oh, I would say,
2 though, that I believe that is in OFPA, the
3 basis for things, and the regulations can be
4 tighter. I was just -- that was more to the
5 NOP as far as the origin of livestock --

6 MR. GIACOMINI: Yes.

7 MR. KARREMAN: -- to make it
8 consistent for livestock. If it can be done.

9 MR. GIACOMINI: Comments,
10 questions?

11 (No response.)

12 MR. GIACOMINI: Okay. Wendy,
13 Jonathan and Gary Zimmer.

14 MS. BUCKWALTER: Good afternoon.
15 My name is Wendy Buckwalter. First I want to
16 say thank you for the opportunity to
17 participate in this process.

18 In a few minutes you're going to
19 hear from my husband Gregg who is an egg
20 processor. So while I do have ties to the egg
21 industry through him, I'm not directly
22 involved in the industry at all. So my

1 comments today are my own and are not
2 affiliated with any specific company.

3 I should be considered more of an
4 informed consumer. I buy organic and I
5 believe in organic, especially when it comes
6 to the topic of animal welfare. And I really
7 appreciate the discussion on outdoor access
8 that is going on, and I think this concept
9 needs to be strengthened and clarified to
10 maintain the integrity of the organic egg
11 industry.

12 I support the idea of
13 strengthening and clarifying the outdoor
14 access requirement for several reasons.
15 First, the standards state that outdoor access
16 must be provided. There are several large
17 organic producers that have small, sometimes
18 even enclosed porches allowing only a small
19 percentage of the birds outside, and the
20 others have to remain inside. And I know that
21 this was not the intent of the standard and
22 I'm certain that any reasonable farmer would

1 understand that this is not the intent of the
2 standard. Yet several organic farms are doing
3 this, using the small porches or deck as their
4 outdoor access.

5 Also, providing outdoor access is
6 intended to allow for the chickens to engage
7 in their natural behaviors, pecking,
8 scratching, foraging, and a porch or deck
9 obviously would not have soil or grass and
10 would not provide for these behaviors. And
11 again, anyone who's reasonably familiar with
12 the philosophy behind the organic production
13 should understand what the intent is, yet
14 several farms seem to favor the idea of, quote
15 unquote, meeting the standards without true
16 regard for the animal welfare.

17 Another big reason why I support
18 the idea of strengthening the outdoor access
19 requirement is that, as a consumer, I and
20 other consumers, I'm sure, too, want to know
21 that buying organic means something. I
22 personally care a lot about where my food

1 comes from. I care about the animals that are
2 involved in producing my food. And if organic
3 standards begin to slack, there are people who
4 would probably switch to maybe cage-free which
5 would be less expensive but still be perceived
6 as having higher animal welfare standards than
7 conventional eggs, or people like me. I'm
8 vegetarian, I eat very few animal products as
9 it is. I would simply stop eating eggs if I
10 felt that they weren't produced with a high
11 standard of animal welfare. So it would just
12 be easy for me, and probably there are others
13 that are kind of on that edge, not eating many
14 animal products.

15 I can see the organic industry
16 getting bigger, and I think that's truly a
17 mixed blessing. While it does mean that
18 organic products are easier for us consumers
19 to get, it can also mean that organic farms
20 being to look like factory farms and that's a
21 slippery slope. My opinion on factory farms
22 is that humans have taken an idea that is

1 basically good, that idea being that farming
2 is a symbiotic relationship between humans and
3 animals, and they've distorted this idea so
4 drastically that it doesn't even resemble the
5 simple premise that it was based on anymore.
6 And I would hate to see organic farming go
7 down that road.

8 In conclusion, I believe that the
9 organic program has a very important place in
10 this country, and I encourage you to keep
11 organic standards high and to maintain the
12 trust that consumers have in organic foods.
13 Thank you.

14 MR. GIACOMINI: Thank you. Any
15 questions or comments?

16 (No response.)

17 MR. GIACOMINI: Okay. Message
18 from Lisa that Jonathan is not here. Go to
19 Gary, Patty and then David. Good to see you,
20 Gary. This will be interesting, I've never
21 seen you under a clock before. So it will
22 either be five minutes worth of words in two

1 minutes or eight minutes worth of words in
2 five. So we'll see how it goes.

3 MR. ZIMMER: My reputation
4 precedes me, I can tell you that. Yes, I'm
5 Gary Zimmer, and our farm is 40 miles west of
6 here, we're an organic dairy farm, and
7 Midwestern Bio, my company, we consult on
8 about 1,000 organic farms, of which about 900
9 of them are dairy, or 90 percent of that.

10 So anyway, my point is this, and I
11 listened to the speeches and all the comments
12 made, and I'm reading a book right now called
13 The Need To Stick. So my ideas have got to
14 stick. Of all the comments you've heard, how
15 do I make them stick and what do I want to
16 make stick? I'm not going to sing a song,
17 Jim. And so that's how you make things stick.

18 And so my point is on animal
19 welfare it this: I do think -- and I agree
20 with Dr. Karreman, that the consumer's the one
21 really we deal with. I'm having troubles
22 with, and the farmers are having troubles with

1 the fact that we need more animal welfare but
2 we don't need more paperwork and regulations.
3 You can drive into my yard and take a look
4 around, and you ought to be able to recognize
5 that I'm within compliance.

6 Now we had an organic inspection
7 this year, and I happened to be gone which was
8 fortunate for somebody -- not somebody else.
9 Anyway, we were accused of only having 24
10 percent dry matter intake coming from our
11 pastures. Now we were offended because we're
12 about 55 percent. Now who will get the math
13 and how? So just like someone's going to come
14 and score my cows, you're going to score
15 wings, they're going to count lesions one day
16 a year? I mean, with NEB, that was really
17 money and I had to lock them in and they
18 looked dirty. Is that fair?

19 And so now I got my paperwork in
20 here and so I want to say that, in this whole
21 thing, that I do like the higher standards on
22 animal welfare, but how to manipulate and

1 monitor this? You ought to do a survey on how
2 many farms the night before inspection fill
3 out all that paperwork. Do a carbon
4 measurement of the age of the ink on the
5 paperwork when you do the organic takeaway.
6 I know too many of them. I'm one, myself.

7 So my point is this: If you're
8 going to -- and we're going to have those
9 higher standards, we've got to get down to
10 common sense. And you can drive in my yard,
11 you ought to be able to recognize it by
12 degrees. And so I'm asking and saying, if
13 you're going to have higher rules, bring me
14 someone skilled that can interpret and
15 understand a dairy cow. Don't send me someone
16 who doesn't even know the front from the back
17 of a dairy cow. How many people know what 30
18 percent dry matter intake is? How many know
19 how much my cows eat?

20 And so see, I'm saying that if you
21 get that match in line to where this -- you
22 know, the professionalism that comes onto my

1 farm. And so I know the DPO parts, but how
2 we're going to do that paperwork, how we're
3 going to do it, I think it needs to be more
4 skilled, trained inspectors onto my farm.

5 In the old days, back in the '90s,
6 I was the guy that was against the National
7 Organic Program, because I figured if the
8 government got in it, it was bound to screw it
9 up. Now, I've changed my mind, kind of,
10 because I was certified with three agencies in
11 the late '90s. Because if that one didn't do
12 it right then I took that paperwork and
13 presented it. I'm afraid I'm getting back to
14 that. I'm going to go to agencies that got
15 the guys that know the most about dairy to
16 inspect my farm. That's all I'm asking is
17 that, make a higher standard, but then hire
18 someone that's got dairy skills if they're
19 going to do me an animal welfare thing on my
20 farm. Have them come and help me and work
21 with me, and I'll gladly share my farm. But
22 one day a year isn't going to cut it.

1 Does it stick? I got my point
2 across, thank you.

3 MR. GIACOMINI: How are we doing
4 on time there, Tina?

5 MS. ELLOR: One forty-seven.

6 MR. ZIMMER: I got it in, huh?

7 MR. GIACOMINI: Got it in. The
8 five minutes in three. There we go. I was
9 wondering which was --

10 MR. ZIMMER: Three minute running
11 my mouth.

12 MR. GIACOMINI: Questions or
13 comments for him? Kevin.

14 MR. ENGELBERT: So you think,
15 Gary, that you want more than one inspection
16 a year, is that right?

17

18 (Laughter.)

19 MR. ZIMMER: I would actually --
20 actually now they come in the summertime for
21 the grazing, either more or a communication
22 that's different or a system that I'm more

1 involved with someone who's on my farm. I
2 don't know how to do the more. Either you're
3 going to have to entrust my integrity or we're
4 going to -- so where do we go next? I don't
5 like the one-day thing there. Maybe a
6 connection with my veterinarian. I don't care
7 what that connection is, if they're going to
8 force a higher standard then we're going to
9 have to have a better way of figuring out how
10 people meet it.

11 MR. ENGELBERT: We talked about
12 that in the committee, but we know that we
13 can't put veterinarians in that kind of
14 position. I understand exactly where you're
15 coming from, but we're trying to meet consumer
16 expectations, as you've heard, and maybe it's
17 just simply a case of we're going to have more
18 training or better training, more training,
19 and maybe even some type of exam for a
20 livestock inspector to pass to become a
21 livestock inspector.

22 MR. ZIMMER: Especially when

1 you're bringing in health, welfare and
2 evaluating what sickness is. When we write
3 down how many sick animals we have on the
4 farm, we write down very few because we don't
5 have any drugs to give them. We have lost one
6 this -- a while ago to pneumonia that had to
7 be treated with an antibiotic, but otherwise
8 we see them looking rough and we give them
9 extra vitamins and minerals. Is that a sick
10 animal we treated? So we don't record that.
11 So I agree, maybe a higher standard of
12 training for those people that would do that,
13 in some means. And make sure that one day a
14 year doesn't judge me.

15 MR. GIACOMINI: Thank you. Patty
16 Lovera, Dave Will and Gregg Buckwalter.

17 MS. LOVERA: Okay?

18 MR. GIACOMINI: Yes.

19 MS. LOVERA: My name is Patty
20 Lovera. I work for a group called Food and
21 Water Watch. We're a non-profit consumer
22 advocacy group. I work in our Washington,

1 D.C. office. We're also a member of the
2 National Organic Coalition, so we're also in
3 support of the comments that have already been
4 submitted by NOC, which I probably won't have
5 time to get to all of those issues.

6 So we've already submitted a
7 formal comment on nano technology and we also
8 had folks who are our members and supporters
9 weigh in as well. They were combining their
10 concern on nano technology and hops at the
11 same time, which is probably a first for us to
12 be able to combine those two topics. But the
13 short version of the easier one first. You
14 know, our members and consumers are very
15 concerned about ingredients in organic
16 processed food and they were very anxious to
17 hear about when hops would come off that list
18 of commercially unavailable things, and so I
19 think they will be encouraged that you're
20 planning to do that faster.

21 On the more complicated topic of
22 nano technology, I've been here before, lots

1 of other folks have been here before, we've
2 all been doing this for a while. And the
3 short version of this is we think it's time
4 for the Board to say something definitive
5 about nano technology to get the ball rolling.
6 We understand there's a lot to figure out, we
7 understand that it's complicated, and we have
8 to figure out a way to enforce it. But it's
9 time to take that step and to put that signal
10 out there. And we think that that actually
11 helps to start the process and sends the
12 signal to the market that, if you are in the
13 organic business, whether it's -- at whatever
14 stage, or you're making materials that you
15 want organic folks to start using, that
16 there's a clear signal that it's not allowed.
17 The first step of that comes with a vote from
18 the Board.

19 You know, we saw a lot in the
20 recommendation that we agreed with. Lisa from
21 Center for Food Safety outlined some of these,
22 the definition and the size, the -- specifying

1 that just because something is allowed in its
2 bulk form doesn't automatically mean it should
3 in its nano form. We agree with that and
4 appreciate you spelling that out in the
5 recommendation.

6 We would suggest a little bit of a
7 clarification in the definition. We
8 understand, and we're not quibbling with the
9 need to talk about traditional food processes
10 and homogenization in milling. We get that.
11 We're not asking to reopen that can of worms.
12 But we would like just a little bit of
13 clarification to talk about the way we're
14 using those processes now so that ten years
15 from now someone doesn't find a way to do
16 extreme homogenization or call something
17 homogenization then we out what it really was
18 intentionally done to produce a nano scan
19 material. We have had this kind of slippage
20 in words in other parts of the food industry
21 when we fight about the word pasteurization
22 being used to describe things that are nowhere

1 near what we think of as pasteurization. So
2 we would just like to put in there the way
3 we're using these traditional food
4 technologies now so we don't have some future
5 problem on our hands.

6 And so when it comes to dealing
7 with nano technology in the organic standards,
8 we think that they are synthetic, and we agree
9 with that assessment, and that does take you
10 down the road to, you know, food contact,
11 preservatives in packaging. All of that is
12 important. But given some of the current
13 challenges in dealing with synthetic materials
14 and given really the unregulated state of nano
15 technology in the rest of the economy, in the
16 food supply, we think that synthetic
17 classification isn't enough. And so we very
18 strongly urge the Board to go a step further
19 and to make it prohibited, to get it up into
20 Section 105.

21 We've had lots of analogies today,
22 and then the one, you know, for nano about

1 walls and doors, whatever. We think that the
2 door option, no matter how you lock it, does
3 present a risk to the credibility of the
4 organic label to consumers. We think it's
5 time, at this stage, just to have a wall and
6 make it very, very clear that we don't want it
7 getting in there. And we feel the way to do
8 that is to put it up there in 105 as
9 prohibited.

10 You've -- a lot of your attention
11 and time and the burden that you have to deal
12 with being on this Board is dealing with this
13 synthetics process and adding nano materials
14 to that mix doesn't seem like a good idea to
15 us. You have enough to do without trying to,
16 in the future, deal with specific, you know,
17 case by case issues of nano versions of the
18 materials you're already struggling to make
19 decisions about. And so there's not -- and
20 there's not good technical information out
21 there to help you do that.

22 Some researchers have estimated

1 that we're 30 years behind in evaluating the
2 potential health and safety impacts of nano
3 materials, and it could cost billions of
4 dollars to do so. So we think the best way to
5 deal with that at this point is to just keep
6 them out.

7 So I'll just stop there. I think
8 you've heard this from us before, and lots of
9 other folks before. We just think, you know,
10 given the really unregulated state of these
11 materials, no one is looking for them. You
12 know, the FDA's not keeping up, the EPA's not
13 keeping up, the best way for organic to try to
14 deal with this is to just keep them out. And
15 so we'll put in the organic principles of, you
16 know, trying to prevent environmental harm and
17 to think about human health, whether it's
18 consumer health or worker health in the
19 facilities that might have to deal with these
20 things. And then acting in the interest of
21 precaution, we think that that all leads us
22 down the path of having to have a prohibition.

1 So I'll stop there.

2 MR. GIACOMINI: Questions? Jay?

3 MR. FELDMAN: Do you think -- is
4 there a simple way to characterize the issue
5 around homogenization, about what we're doing
6 now in terms of current techniques that would
7 be -- would we view, and we have defined in
8 the document as acceptable processes that
9 result in incidental nano particle size, is
10 there -- do you think you have a suggestion
11 for language for a simple way to characterize
12 future abuses in those categories?

13 MS. LOVERA: Two things that we
14 thought of, which I think we included in the
15 comment we submitted a few weeks ago, was to
16 talk about saying, that are in use now, you
17 know, setting a point how things are being
18 used now. And also another idea for
19 homogenization might be to talk about milk,
20 because we're hearing about homogenization for
21 rice, you know, to make a different form of
22 rice products that could be used in

1 ingredients. And maybe spelling out the way
2 that they're being used now, the materials
3 that are being used now, is one place to start
4 thinking about it.

5 MR. GIACOMINI: Yes, question. In
6 the final analysis I'm a little confused about
7 what you recommend for us to do with this
8 document. I think two points, first of all.
9 I think the rewrite in the document to make a
10 completely 105 prohibition would not be
11 possible in the time we have before voting
12 tomorrow, and the public disclosure and all
13 those things. And also the risk that, with
14 everything needing to be two-thirds off this
15 Board with 14 people, that would need to be at
16 least ten people voting in favor of it. And
17 we're very concerned with the risk of that.

18 Considering those two things,
19 would it be your recommendation to proceed
20 with this document as I was kind of hearing
21 you say, take the first step, start down the
22 road, you know, start going there, or to take

1 no action at all?

2 MS. LOVERA: I think we'd like to
3 see you give it a shot on prohibition, and see
4 how we do. I mean -- and then the other piece
5 that I should have mentioned and didn't was,
6 we don't see a need to wait for a symposium or
7 for further work to really outline what you're
8 going to do. I mean, we would like to see
9 some action now. We feel very strongly that -
10 - and other public comments might say this as
11 well, that if there is time to put that
12 prohibition in, that you should try it.

13 MR. GIACOMINI: But how do you
14 feel about, if this document is the best we
15 have right now, are we better proceeding with
16 it or doing nothing? Understanding it's a
17 step.

18 MS. LOVERA: Yes. I think we
19 would like to see you go for the prohibition.
20 I think we need -- you know, we need to draw
21 that line. And if -- also, we'd like to see
22 who doesn't want to prohibit it. We'd like to

1 see where the votes are and what the problem
2 is.

3 MR. GIACOMINI: Okay. Any further
4 questions, comments? Thank you. Oh, Jay.

5 MR. FELDMAN: Can you characterize
6 for us the -- what you think the organic
7 consumer is going to think? I mean, the
8 perception here in crafting a compromise is
9 that the consumer will see a relatively good
10 definition, hopefully we can add a sentence in
11 there that clarifies, that we're talking about
12 technology, non-nano technology homogenization
13 as it's used now. I think we need more -- we
14 need to clarify that language. But I'm
15 worried that, if the Board does nothing -- but
16 I'm interested in your perspective as whether
17 the organic consumer will perceive that as a
18 failure on the part of the organic community
19 to adequately -- or to move in the direction
20 of regulating this. So that's why I got
21 behind the compromise, although as I said
22 yesterday, I think a number of us on the Board

1 would prefer the 105 approach.

2 So to clarify, you think the
3 definition is okay with that one
4 clarification, and that will send a message to
5 consumers that at least we got the definition
6 right?

7 MS. LOVERA: I think the consumers
8 would like to know that we started the process
9 to get it settled. But putting out a process
10 that has what we think is a risk of not having
11 a prohibition, you know, I mean, I can speak
12 for the consumers that communicate with us,
13 that come to us, that ask us questions, and
14 they are increasingly concerned about the
15 synthetics issue, about the ingredients issue.
16 They couldn't articulate which lists, you
17 know, and the sunset process. But they're
18 increasingly concerned about those, it's not
19 allowed but except these are allowed. I mean,
20 there are people -- and that's why we're
21 getting a lot of response and concerns and
22 questions about, you know, when we have these

1 processes for individual chemicals.

2 And so I think putting in that
3 track, for lack of a better word, reinforces
4 the fears that are starting to nibble at their
5 confidence in organics. So I think if there
6 is a chance, you know, to have more discussion
7 and to move quickly towards prohibition, I
8 think it's worth that chance for the
9 credibility and the confidence of consumers.

10 MR. GIACOMINI: Thank you. I
11 guess where, you know, this is a body of
12 stakeholders with different positions on this,
13 and I'd like to send a clear signal that we
14 are grappling with the definition, that we've
15 met the expectation of the consumer community
16 and hopefully, in terms of the definition, and
17 that we'll initiate a process to collect more
18 consumer input to, in effect, activate. I'm
19 sure we'll see a lot more comments than we'd
20 like to see, you know, in terms of processing.
21 But I assume that this process will activate
22 consumer involvement.

1 Anyway, I appreciate your comments
2 on this.

3 MR. GIACOMINI: Program?

4 MR. McEVOY: Yes, I want to go
5 back to what Tracy was asking about in terms
6 of this document, and the cloning in
7 particular. Because with cloning, we're
8 eventually going to go into rule making around
9 cloning, but currently, because of the NOSB
10 recommendation to consider cloning an excluded
11 method or prohibited practice, that the
12 program was able to put out a policy memo and
13 cloning became prohibited under the National
14 Organic Standards. So you can make an analogy
15 here to what you were -- what this proposal
16 is. Synthetic substances are prohibited,
17 unless they're specifically allowed. If the
18 Board states that nano technology substances
19 are synthetic, then therefore they are
20 prohibited, and we can issue a statement that
21 that, in fact, is -- that nano technology
22 substances are prohibited because they are

1 synthetic by the Board determination.

2 To make a rule change to 105,
3 that's a much more complicated process. It's
4 going to take a much longer period of time.
5 So if you want this to happen now, the best
6 way to make it happen now is to call nano
7 technology substances and therefore, at least
8 initially, the wall is put up.

9 MR. GIACOMINI: Katrina?

10 MS. HEINZE: And does this
11 document do that for you?

12 MR. McEVOY: It appears to, yes.

13 MR. GIACOMINI: Tracy?

14 MS. MIEDEMA: Should that be
15 paired with the more plant-a-flag type
16 statement, too, that leads to a firm
17 prohibition? Like should we try to shoot for
18 both in the same document or do this
19 sequentially?

20 MR. McEVOY: Well, I'm not sure
21 how you handled the cloning recommendation.
22 Did you ask for both a rule change or did you

1 just make a statement that cloning was not
2 compatible with organic production? If that
3 was what the recommendation was, what the
4 Program then did was issue a statement and
5 then put it into the work plan that eventually
6 it would require rule making. To get to the
7 full extent of what your recommendation
8 stated.

9 So the same consideration could be
10 here. You just need to make a recommendation
11 of what you want and we figure out the best
12 way to implement that. If a rule change is
13 required, then we can go forward with a rule
14 change. If you want to make that explicit
15 that you want the rule to be changed, you can
16 do that as well.

17 MR. GIACOMINI: We proceeded with
18 the document that, number one, we were fairly
19 confident would pass, that we could provide to
20 you on issues that you could take action on as
21 soon as you could deal with the document.
22 Whereas, within this definition of nano, of

1 engineered nano particles, they are synthetic
2 under the rule, they are not allowed unless
3 listed, and the recognition that the nano farm
4 particles of anything currently on the list
5 have never been reviewed in the nano form.

6 We further then asked you to
7 review the possibility of -- the issues of the
8 enforcement for primary packaging, for food
9 contact surfaces, which may or may not be
10 problematic. If they're not, that's great.
11 If they are, we would like to know about --
12 that we were -- we thought the Board should
13 know about them before they took full action.

14 I don't remember what the other
15 bullet points were off the top of my head, but
16 it was an effort to give you something to deal
17 -- to work with as soon as possible so that we
18 could then proceed. We called for a symposium
19 as a way to sort of bring all that information
20 together. That may not, in the long run,
21 being the absolute best mechanism, but it was
22 what we had to work from at the point in time

1 of preparing the document. But it was to give
2 you something to work with right now, or as
3 soon as you could get to it, anyway.

4 MR. McEVOY: Yes, it would be a
5 good document for us to work with, the
6 substances part will be very clear. It's the
7 things beyond the substances that the
8 regulatory status of that is -- needs some
9 exploration.

10 MR. GIACOMINI: And that's what we
11 asked for you to do.

12 MR. McEVOY: That's what we could
13 do.

14 MR. GIACOMINI: Jay?

15 MR. FELDMAN: The only thing I
16 heard missing from that, I think --

17 MR. GIACOMINI: I said I forgot
18 something.

19 MR. FELDMAN: Yes, I know -- that
20 I think I'm hearing from Patty and others is,
21 obviously their long-term goal is to stop this
22 use, to stop this substance from being used in

1 organic. And I believe that the proposal does
2 that pending our consultation, either through
3 a symposium or some other mechanism.

4 MR. GIACOMINI: Yes. Yes. We
5 basically request that the Board do not review
6 nano substances until it's fully resolved or
7 are extremely judicious in consideration of
8 what they're looking at on anything that comes
9 forth as a nano particle for consideration
10 before listing.

11 I mean, we can't say that someone
12 can't submit a petition, but to come to this
13 document and to look at where we are at this
14 point, at least, before -- if they have to
15 consider that petition.

16 MR. McEVOY: I guess we can talk
17 about this tomorrow. I viewed it more as a
18 moratorium until we collected the community's
19 opinions, but --

20 MR. GIACOMINI: With as much
21 authority as we can. Thank you, I think.

22 David Will -- let's see, we are --

1 three, four, five -- we need to take a break.
2 We are at 5:20, 5:15, 5:20. Let's take --
3 shoot for ten minutes, we will go 5:30. And
4 try and be back promptly. And this is when we
5 should be recessing and I believe we have
6 about between 15 and 20 to go. So we may be
7 looking at another two hours.

8 (Whereupon, the above-entitled
9 matter went off the record at 5:18 p.m. and
10 resumed at 5:31 p.m.)

11 MR. GIACOMINI: Board members can
12 please find their seats. Gallery please find
13 a seat. Any conversations, please take them
14 outside. We'd like to get started again.
15 We'd like to be done, but we will get started
16 again. We try to offer you the full respect
17 we did for the first person speaker of the
18 morning, but it's hard.

19 Okay. We have a quorum and we
20 need to get going again here. Like I say, we
21 are close to two hours behind schedule. Let's
22 -- we're going to try to be respectful but

1 expedient. And we'll go with our first one
2 up, Dave, Gregg Buckwalter and then Alexis.

3 MR. WILL: Thank you. Good
4 afternoon, Mr. Chairman and the NOSB Board and
5 the Program. I first want to thank you very
6 much for the hard work you guys did in these
7 last couple years with the methianine issue,
8 and I'm glad it looks like we may be closer to
9 conclusion.

10 On behalf of our company --

11 MR. GIACOMINI: You haven't been
12 paying attention.

13

14 (Laughter.)

15 MR. WILL: I just got here.

16 (Laughter.)

17 MR. WILL: I do want to let you
18 know that, based on the comments earlier, that
19 our company will be supplying to the MTF the -
20 - our levels of need as a bare minimum for
21 organic poultry, and we'll make sure to be in
22 contact with all the other members of the

1 Methianine Task Force to make sure they get
2 that to you as soon as possible so you can
3 have that to review at the next meeting.

4 Also I just wanted to remind you
5 again, as members of the NOSB, we would love
6 to have you out to one of our ranches. During
7 a break, you're more than welcome to come grab
8 me for a card or I'll leave some here with the
9 secretary so you can grab one. If we're not
10 available for you geographically, I'm sure I
11 can find somebody on the MTF, on the organic
12 poultry side or the layer side, that would
13 love to have you guys out to take a tour. I
14 know the Program's been out and seen a couple
15 ranches, and we'd sure like them to come to us
16 as well and take a look at some productions
17 there.

18 Third, we really like the
19 guidelines that we've seen and the direction
20 that MP-50.24 went, the guideline for outdoor
21 access to organic poultry, and we'd like to
22 see that go to rule making if at all possible.

1 We really liked a couple things in there which
2 was, they addressed the threat of an avian
3 influenza break or influenza break and dirt.
4 We thought those were key changes to the
5 existing rule and we're hugely in favor of
6 those.

7 Also we, as a company, would
8 oppose any rule making that would offer grand
9 fathering in and anything that had a two-step
10 program. We just think that the marketplace
11 would be too confused by those and just would
12 not see how that would benefit the organic
13 consumer.

14 In 50.24, we do have one word that
15 we'd like to change, and that's the word six
16 where it refers to the age of pullets that
17 need to go outside. And this is actually Ron
18 Christiansen, he's our ranch manager at one of
19 our facilities. He's been in the industry for
20 32 years and been in a dedicated organic
21 facility for the last five. And I brought him
22 along to specifically speak to or answer any

1 questions that you have on pullets.

2 So Ron, let me get the guitar for
3 you. Here.

4 (Laughter.)

5 MR. CHRISTIANSEN: Again, thank
6 you, Board, for your hard work. This is my
7 first meeting and it's been encouraging to see
8 your desire to listen to all parts of the
9 organic family. We are a diverse family and
10 sometimes it's very hard to bring all the
11 components together. We don't agree all the
12 time. And I thank you for listening very
13 genuinely, to our concerns.

14 The issue at hand is the
15 requirement to change to require outside
16 access for grain pullets at six weeks of age.
17 As a poultry producer, I am given charge of
18 many responsibilities, and two of those are to
19 the health and safety of the birds that I am
20 in charge of and care of. And then I'm also
21 given responsibility of the food supply, the
22 organic eggs that we put out. And requiring

1 pullets to the outside access at six weeks of
2 age doesn't allow me, in my opinion, to do
3 both very well.

4 On the outside, the pullets are
5 subjected to higher risk being exposed to
6 diseases and disease-causing agents, which
7 that's obvious I can control the indoor
8 environment much better than I can control the
9 outside. Rodents and varmints and wild birds
10 and the like, which is on the outside that I
11 can control on the inside to a certain degree
12 of success.

13 I have the tools available to me
14 to protect the birds and to keep them safe and
15 to protect their food supply. I just don't,
16 with the six weeks of age, to implement this
17 vaccination program that I need to to build
18 the birds' immunity. The science behind that
19 scene is the need for boosting, we follow
20 vaccinations and the time needed to build
21 adequate immunity in pullets are well
22 established. At six weeks of age, I just have

1 begun the process.

2 As an example, on our particular
3 ranch, I give four Newcastle vaccinations. At
4 six weeks of age, I've only given two. I give
5 four bronchitis vaccines. At six weeks I've
6 only had time to give two. I give three E-
7 coli vaccinations, and at six weeks of age,
8 only one has been given. Salmonella, I give
9 three, and at six weeks of age only one has
10 been given. I have not yet even given a
11 fowlpox vaccination or the Asian
12 encephalomyelitis vaccine. And I understand
13 that AE -- AI is on the horizon for
14 vaccinations, and that will take a procedure
15 or protocol.

16 I have talked with California
17 State Animal Vet, Dr. Grey Cutler, and Texas
18 State Animal Vet, Jose Aguirre-Ramirez and
19 both agree that allowing birds outside access
20 before their vaccination program is complete
21 and they've had time after that last
22 vaccination for the immune system to build, is

1 not in the birds' best interest.

2 MR. GIACOMINI: Okay. Can you --
3 your time is up.

4 MR. CHRISTIANSEN: Okay.

5 MR. GIACOMINI: Do you have a
6 final concluding comment? Otherwise questions
7 and comments. Kevin.

8 MR. ENGELBERT: To state the
9 obvious, you're very reliant on vaccines to
10 maintain the health of your birds. Has this
11 always been the case with raising poultry and
12 do you know offhand what percentage of these
13 vaccines are GMO?

14 MR. CHRISTIANSEN: On my operation
15 -- let me answer the second one first. I
16 believe I might have one, that might be the
17 only one. As far as -- I do rely heavily on
18 the protection that vaccinations provide. I
19 am a believer in that. We have the tools, and
20 given the time we can adequately prevent the
21 birds from getting the diseases that they're
22 challenged with.

1 MR. GIACOMINI: Questions --
2 further questions, comments?

3 (No response.)

4 MR. GIACOMINI: Okay. Thank you,
5 gentlemen.

6 MR. WILL: Thank you.

7 MR. CHRISTIANSEN: Thank you.

8 MR. GIACOMINI: Gregg Buckwalter,
9 Alexis and Jeff Richards. Go ahead.

10 MR. BUCKWALTER: Thank you. Good
11 afternoon, my name is Gregg Buckwalter. And
12 my wife, she was the vegetarian -- and I'm not
13 --

14 (Laughter.)

15 MR. BUCKWALTER: -- that spoke
16 earlier. I'm going to go ahead and give my
17 conclusion or thoughts first before I go into
18 my speech so that I have time to do that.

19 I applaud you in setting density
20 figures to take away the interpretation of the
21 law and making it clearer. Right now our
22 operation can meet the standards as they are

1 intended, and be under the PEQAP program,
2 which is the Pennsylvania Egg Quality
3 Assurance Program, which is what FDA mirrored
4 in their egg rule. We have 50,000 birds of
5 organic in four farms that are on pasture at
6 the stated levels. We haven't done the
7 pullets yet at the moment, but we have -- we
8 do have 50,000 of our 100,000 birds of organic
9 that are right now compliant with these new
10 regulations.

11 And I would echo David as well as
12 -- don't allow two different organic
13 classifications. And don't grandfather. The
14 people that put up some of these facilities
15 that they did, they knew what they were doing
16 when they did them, they knew that they were
17 making -- taking something good and making it
18 bad, or making it less desirable, shall we
19 say. It's just different production styles.

20 I'm a third-generation egg
21 processor. I should have said that first.
22 But -- from Pennsylvania. The older I get the

1 more I understand the benefits of organic
2 farming, and the more it makes sense to me.
3 It bothers me to see the beautiful landscapes
4 of farms, in Pennsylvania anyway, turn into
5 blacktop and houses. In my opinion, the
6 organic farming could be a solution to this
7 following -- allowing smaller family farms to
8 stay in business.

9 The United Egg Producers have a
10 comment in one of their newsletters stating
11 that if the U.S. would go to cage-free
12 production styles, we would need tens of
13 thousands more farms to produce that. Great,
14 I thought. People complain about one of those
15 things, that family farms are disappearing.
16 I see that as a way for families to make good
17 income for their -- off their farms instead of
18 having to sell them for development.

19 In our company, we have made a
20 decision not to bring in product or eggs from
21 farms that have two or more houses or any
22 aviaries. We feel that having too many birds

1 on a location is becoming a complex and is too
2 much like the conventional-style production.
3 We also believe that if paid well enough, that
4 farmers can make a good living with what they
5 have.

6 If you look at what happened in
7 the organic egg industry over the last 30
8 years, it's starting to mirror the
9 conventional industry. The mindset of the
10 conventional guys, to offer what the customer
11 wants so that no one else can get into the
12 customer base. There's a large midwest
13 producer that, in the past year, has talked
14 about how bad cage-free and organic styles of
15 production are, yet he bid on and supposedly
16 got a contract for the cage-free and organic
17 business of a large grocery chain in the
18 southeast U.S.

19 Many of the conventional producers
20 only see organic production in terms of dollar
21 signs. If you look at most of the
22 conventional guys' organic housing, it is an

1 aviary-style housing, 30 to 60,000 birds in
2 one house and a row of houses beside each
3 other. They don't know anything other than to
4 cram birds into a house and they get away with
5 it and sell as cheap as they can.

6 The conventional market has been
7 very good to a lot of these producers and has
8 given them money to put up houses, complexes
9 and gain economies of scale to put the smaller
10 the smaller producers with integrity out of
11 business. They've also been flush with cash
12 because of the conventional market being so
13 high that it enabled them to outlast their
14 competition and they can sell to low cost and
15 play a few games.

16 In southeast Pennsylvania, close
17 to one of our -- close to our facilities,
18 there is one larger conventional farm that has
19 an organic house that's two stories high with
20 30,000 birds in each level. Their access is
21 a wooden porch with steps, and I'm not even
22 sure, from what I understand, they don't even

1 let the birds out, according to their vet.
2 That doesn't sound very organic to me, in
3 fact, I understand that there are some
4 certifiers that won't certify them, and -- but
5 there's still one particular one that will.
6 But that's a whole other story, I guess.

7 One certifier's idea of birds
8 exhibiting natural behavior is different from
9 another. A certifier wants to keep their
10 income up. With these larger facilities they
11 may be able to do that. I have one more
12 comment. They may be willing to view things
13 in a different light than others would.

14 If all the producers that had put
15 up these new facilities can use them as cage-
16 free, they don't need to be grand fathered in.
17 They pretty much everyone that produces
18 organic also produces cage-free along with
19 them.

20 MR. GIACOMINI: Questions and --
21 Kevin?

22 MR. ENGELBERT: Thank you. How

1 much outdoor access do you allow your birds,
2 and if you feed synthetic methianine, at what
3 levels do you feed it?

4 MR. BUCKWALTER: Right now, we are
5 -- I know we're at at least the two -- minimum
6 of the two square foot. And as far as the
7 methianine, I believe it's what the levels had
8 ratcheted back to. I'm not exactly sure
9 offhand, I'd have to look it up. I'm sorry.

10 MR. GIACOMINI: Questions, comments?

11 (No response.)

12 MR. GIACOMINI: All right. Thank
13 you. Alexis, Richard and Paul.

14 MS. BADEN-MAYER: Hello, I'm
15 Alexis Baden-Mayer here on behalf of the
16 Organic Consumers Association and the 900,000
17 organic consumer activists who have worked
18 with us over the last decade to keep organic
19 standards strong.

20 On behalf of our 250,000 current E
21 activists and our 118,000 Facebook activists,
22 I'm here to talk to you today about phasing

1 out non-organic and synthetic ingredients,
2 keeping nano technology out of organic and the
3 importance of animal welfare, especially the
4 maximum stocking densities and outdoor access
5 for organic poultry.

6 On nano technology, over 13,000
7 Organic Consumers Association activists have
8 submitted comments to you about the importance
9 of keeping nano technology out of organic.

10 Nano technology is already being used in food
11 without being safety tested or labeled or
12 regulated. Very little is known about the
13 health and environmental effects of current
14 commercial applications of food nano
15 technology but the dangers are beginning to be
16 exposed. Nano silver, for instance, is a
17 powerful biocide that kills beneficial as well
18 as harmful bacteria and is toxic to fish.

19 Nano gold decreases earthworms' reproductive
20 capacity by 90 percent. Titanium dioxide nano
21 particles cause DNA damage in mice.

22 If you sincerely agree with

1 consumers that nano technology should be
2 excluded from organic, please do not pass the
3 current committee recommendation. The current
4 committee recommendation simply states the
5 current status quo. It doesn't require any
6 action of the NOSB or the NOP to recognize
7 products of nano technology are synthetic.
8 They are not allowed in organic, and if a
9 company wants to use engineered nano materials
10 in organic production, processing or
11 packaging, they have to petition the NOSB for
12 permission.

13 A year ago, there was a committee
14 recommendation to ban nano technology from
15 organic altogether. That is the only
16 recommendation worth voting for -- voting on,
17 is what I meant to say. But if it didn't
18 pass, it wouldn't be the end of the world.
19 Nano technology still isn't being used in
20 organic, and it isn't going to be without
21 specific engineered nano materials being
22 petitioned. So if you want to go ahead and do

1 the right thing, ban nano technology from
2 organic, but do not pass the current committee
3 recommendation.

4 Before I finish on nano tech, I
5 just want to refer you back to the statements
6 from the Center For Food Safety concerning
7 packaging. Nano technology is not allowed in
8 organic packaging.

9 On animal welfare, over 11,000
10 Organic Consumers Association activists have
11 submitted comments on the importance of animal
12 welfare standards. In favor of phasing out
13 synthetic methianine, and to enforce current
14 regulations that require hens to be able to
15 exhibit their natural behaviors and have
16 meaningful year-round access to the outdoors.
17 We will continue to submit comments in support
18 of the animal welfare discussion document on
19 stocking density. Please continue to keep up
20 the good work you all are doing on animal
21 welfare.

22 Now that the National Organic

1 Program has put out a draft item on outdoor
2 access for poultry, we are directing our
3 comments to the NOP. We would like to see
4 much stronger guidelines. The NOP should
5 implement the NOSB's recommendations as
6 minimum standards that should guide the
7 creation of organic system plans.

8 Sulfites in organic wine. So far
9 nearly 6,000 Organic Consumers Association
10 activists have submitted comments opposing the
11 petition to change the annotation on sulfites
12 in organic wine. Please reject the petition.
13 Currently, wine made with organic grapes and
14 no synthetic sulfites is USDA organic while
15 wine made with organic grapes and sulfites is
16 made with organic. USDA organic should
17 continue to be reserved for sulfite-free wine.
18 Wine makers are already getting a huge
19 exemption to the general ban on sulfites in
20 organic. Sulfites are prohibited in organic
21 along with genetic engineering, sewage sludge
22 and irradiation. The wine exception for

1 sulfites should not be expanded any further.

2 Non-organic ingredients. More
3 than 4,000 Organic Consumers Association
4 activists have sent letters in support of
5 organic beer and bratwurst being made with
6 organic hops and sausage casings. Please pass
7 a recommendation on hops. The logic that was
8 finally applied to hop should be applied to
9 all agricultural products that are currently
10 allowed in non-organic form. The commercial
11 availability evaluation should require an
12 investigation into whether the ingredient can
13 be used on a contract basis.

14 It's time for companies to take
15 responsibility for their supply chain. For
16 example, imagine your -- an organic sausage
17 brand that is owned by the third largest beef
18 and pork processor. Your certifier should be
19 talking to you about contracting for the
20 production of organic sausage casings. The
21 National List sunsets every five years so that
22 producers have five years to look for,

1 contract for or create themselves ingredients
2 in organic form.

3 Just a few more issues. The OCA
4 would like to see the NOSB review each of the
5 lists for inerts. We would like to see the
6 Board pass the committee's corn steep liquor
7 recommendation -- could I just finish the
8 sentence? We do not seek a change in the made
9 with organic label and we oppose the use of
10 non-organic and synthetic vitamins in organic
11 food and we continue to submit consumer
12 comments to the NOP regarding passing the NOSB
13 recommendation on personal care products.

14 MR. GIACOMINI: Questions and
15 comments? Joe.

16 MR. SMILLIE: One of the best ways
17 that we've seen to get something off 606 is to
18 submit a petition. That way, the NOSB can
19 start to move. Sunset, I think, is still not
20 the best way. They have a battle at sunset.
21 I prefer to do it in the full light of day,
22 and I would suggest that your organization or

1 others submit a petition for removal of
2 casings.

3 MS. BADEN-MAYER: Well, it's
4 supposed to be in the law already, that says
5 that sunset is a phasing out. You have five
6 years to prepare for that. That's why it's
7 called a sunset. You know, if it were called
8 something else like, you know, consumer gets
9 a petition to get ingredients off the list
10 that the companies could make themselves, then
11 we'd have a different process.

12 MR. GIACOMINI: Well, they could
13 have called it orange, but we have -- it also
14 has a definition as to what the process is.
15 So there's two parts to it. It's not just a
16 name.

17 MR. SMILLIE: Just giving you the
18 benefit of my experience, the best way to get
19 things done.

20 MR. GIACOMINI: Jay.

21 MR. FELDMAN: So what is the
22 headline, if we pass this nano --

1 MS. BADEN-MAYER: Organic --

2 MR. FELDMAN: Can we write it
3 down?

4 MS. BADEN-MAYER: Organic Board
5 opens the door to nano technology.

6 MR. FELDMAN: Would you consider
7 Organic Board sets moratorium ending further
8 review?

9 MS. BADEN-MAYER: If that's what
10 you guys actually do, but that's not what this
11 recommendation looks like.

12 MR. FELDMAN: Why not?

13 MS. BADEN-MAYER: Because it's
14 just saying it's a synthetic. It's not
15 stating a prohibition.

16 MS. ELLOR: Yes, it does.

17 MS. BADEN-MAYER: So you have less
18 -- you have the GMOs, irradiation, sewage
19 sludge, nano technology. That's where it
20 belongs. It is not a synthetic to be
21 petitioned, in my opinion, into organic. But
22 that's where this recommendation leaves it.

1 MR. FELDMAN: Yes, and I think
2 many on the Board -- I don't think it's quite
3 enough to pass, but many on the Board agree
4 with that but want to establish -- the intent
5 is to establish moratorium pending --

6 MS. BADEN-MAYER: Well --

7 MR. FELDMAN: -- pending now, but
8 we needed to give the NOP -- this is my
9 perspective, you know, anybody else can chime
10 in here. But I believe we needed to give the
11 NOP a definition of what to create a
12 moratorium on. So if that's the case, if
13 we're not achieving that, we -- would it not
14 be better to do that than -- because I could
15 read a headline, if we do nothing, that looks
16 something like NOSB fails to restrict nano
17 technology.

18 MS. BADEN-MAYER: It's a problem,
19 because I came in the spring with another
20 attempt to ban nano technology entirely
21 forever, before somebody comes with the first
22 petition for a nano material.

1 But you know, there are lots of
2 crazy technologies out there. They could all
3 potentially incorporate it into organic, but
4 we understand that they're synthetic. And we
5 already have a process to exclude them on a
6 case-by-case basis. What you all were trying
7 to do a year ago is say, I had a thought
8 process, we are letting everybody know, don't
9 bother petitioning nano materials to organic.
10 They are prohibited forever, excluded, an
11 excluded process. If you just did the
12 recommendation that's currently in front of
13 you, it's just stating the status quo, it's
14 not necessary. I think we heard from the
15 Program earlier that it wouldn't require a
16 regulatory change.

17 MR. GIACOMINI: I respectively
18 disagree. I don't think the Program has any
19 directive at all or any information that the
20 nano form of existing allowed substances are
21 considered any different than what the listing
22 is.

1 MS. BADEN-MAYER: I haven't seen
2 any comments that say nano technology is not
3 a synthetic. I haven't heard anybody on the -
4 -

5 MR. GIACOMINI: On the list of the
6 allowed synthetics, currently the nano forms
7 would be allowed.

8 MS. BADEN-MAYER: Okay. Well, if
9 you're going to think that -- if that tiny
10 issue is the problem that you think you need
11 to address that tiny issue.

12 MR. GIACOMINI: It's part -- it's
13 just part of the issue.

14 MS. BADEN-MAYER: Well, address it
15 directly, then. But if this is -- because
16 this is right now your statement on nano
17 technology in general. And it is better to be
18 specific than it is to say -- you know, it's
19 sort of like passing this recommendation is
20 sort of like saying, come on, petition nano
21 materials to organic because we're leaving the
22 door open to it. We have decided not to

1 prohibit, it is an exclusion method. We're
2 treating it as a synthetic, it can be
3 petitioned. I mean, that's where that
4 currently stands. But there's no reason to
5 announce that to the world and say that, you
6 know, that's where --

7 MR. GIACOMINI: I --

8 MS. BADEN-MAYER: Let's keep that
9 on the down-low until we get it --

10 MR. GIACOMINI: You know, we have
11 a difference of opinion of what this
12 recommendation does, and we worked very hard
13 to try and come up with a path that gets to
14 the place where we can have a recommendation
15 that will pass and it's in the direction of
16 where we all want it to go. Unfortunately, we
17 don't control the yank at the end of the day.

18 Any other questions or comments?

19 Thank you, Alexis.

20 Jeff, Chris and Bob.

21 MR. RICHARDS: Good evening. My
22 name is Jeff, I'm from Pines International,

1 Kansas. We're primarily a grower, organic
2 grower and manufacturer of wheat grass, barley
3 grass and alfalfa products for the last 34
4 years. Our most popular retail products are
5 tablets of which we used two excipients. A
6 percent and a half of silicon dioxide and half
7 a percent of magnesium stearate.

8 We were very excited to hear that
9 there could be an organic substitute for these
10 two ingredients, or two different substitutes.
11 One for the magnesium stearate and one for the
12 silicon dioxide. So we experimented and found
13 that the magnesium stearate substitute worked
14 excellent. And we're in the process of
15 switching over to it and changing our labels.
16 However, the silicon dioxide replacement, we
17 could not make a decent tablet, even when we
18 doubled the amount of the ingredient.

19 The substitute -- well, in
20 particular the silicon dioxide substitute
21 definitely has a place in the industry, but
22 obviously it is not acceptable or workable in

1 all applications. Last week I was at the
2 supply side show and talked with another
3 organic manufacturer that does vegetable and
4 juice powders, and they use silicon dioxide as
5 an anti-caking agent. He had also tried the
6 rice substitute and with no success. He was
7 not aware of this petition to get rid of
8 silicon dioxide, and I think there's a lot of
9 manufacturers out there that are not. And so
10 I think there needs to be more manufacturer
11 input on this subject.

12 If we cannot silicon dioxide, it
13 will seriously affect our ability to continue
14 our sustainable farming and also provide our
15 consumers with inexpensive and convenient form
16 of organic green leafy vegetables. Silicon
17 dioxide is not harmful to the environment,
18 neither its use or manufacture, and we
19 sincerely ask the Board to continue to leave
20 it on the National List.

21 Thank you.

22 MR. GIACOMINI: Questions or

1 comments?

2 (No response.)

3 MR. GIACOMINI: Thank you. Chris,
4 Paul -- Chris, Paul and Bob. Chris, are you
5 here?

6 (No response.)

7 MR. GIACOMINI: Paul, are you
8 here? Let's go, Bob.

9 MS. BRINES: Paul is here.

10 MR. GIACOMINI: Pardon?

11 MS. BRINES: Paul is here.

12 MR. GIACOMINI: We will -- no, go
13 ahead. You didn't know you were going to be
14 next, so -- Silvia is next up.

15 MR. DURST: While she's loading
16 that up, I'll start up.

17 I'm here as a proxy for Whitmeyer
18 MicroGen, which in this case it's a facilities
19 processing pesticide manufacturer. And one of
20 the concerns that we have is -- and I'll point
21 the question back to the Board and to the
22 Program here, is that after -- it has to do

1 with inerts in pesticides. And what's showing
2 there, I'm sorry it's not a very good copy, is
3 after the August 2004 listing of inerts in
4 pesticides, the List 4 stuff, EPA continued to
5 reevaluate materials for inclusion on List 4.

6 And this is a letter from them,
7 August 2006, and the materials in question
8 here, you can read at the very bottom there,
9 said that the materials on -- that they had
10 petitioned for should be included in List 4B.
11 So this is 2006. Obviously you know that that
12 list got dropped later on and EPA quit
13 evaluating things. But the Program in -- what
14 was it, December of 2007 said, we're only
15 going to use the EPA List 4 things from August
16 2004, minus a handful of items that had been
17 excluded from List 4, but not including things
18 that had been reevaluated in good faith
19 between 2004 and when they ultimately dropped
20 that.

21 And so a bunch of this stuff is
22 orphaned until sometime when this new EPA NOP

1 thing gets sorted out. And I'm -- what I'm
2 asking and requesting, and we heard the same
3 from Cameron a little earlier this afternoon,
4 is they -- we would like these things that got
5 orphaned to be included in this interim period
6 while things get reevaluated. And I've had a
7 discussion with Miles and he says they're not
8 going to do that. But I'd like the Board to
9 say, gosh, what's the problem here, why can't
10 we include these things that got orphaned?
11 Because when that List 4 2004 publication came
12 out, there were things that people said, gosh,
13 it's not on our list, let's get it on our
14 list. In good faith they did that and they're
15 still out of luck with using them in the
16 interim time period.

17 Having said that, leave it at
18 that. This is the table of what those five
19 items were in this particular case here.

20 They're petroleum distillates, hydrocarbons
21 used as solvents in carriers for pesticides.

22 While I still have a little bit of

1 time, let me go on to the next slide here.
2 And first off, I want to say, I was speaking
3 earlier on the CSL issue, and in a direct
4 question or response to a direct question from
5 Jay Monday, he asked whether disulfide bonds
6 were covalent bonds. I said no. That was
7 wrong. I should not have said that. They are
8 covalent bonds but they're unique and very
9 interesting in covalent bonds in that they're
10 weak covalent bonds. They are reversible and
11 the typical protein structure which has a
12 covalent bond, covalent backbone, is not
13 broken like disulfide bonds are broken, it
14 only changes the quaternary structure of the
15 protein and it doesn't change the character of
16 that protein, just the physical shape of that
17 protein. So I just wanted to correct some
18 misstatement that I made earlier and clarify
19 a little bit about what's going on with that.

20 So just for your interest, here
21 are some photomicrographs -- go back one.
22 This is what we're talking about here. These

1 are photomicrograph of the endosperm and what
2 we're looking at, these are starch granules.
3 And the little dimples, dots on top of there
4 are actually the zein protein bodies which are
5 the proteins that are surrounding the starch
6 granules. And our next slide -- sorry it's a
7 little hard to see, but here's a place where
8 these protein bodies have been stripped off of
9 the starch granule and there's little dimples
10 left behind there. Here's a spot where the
11 protein bodies are still present on there,
12 they haven't been ripped off yet. Just to
13 show an example of what we're talking about as
14 we're dealing with the steeping process. The
15 steeping process is releasing the zein protein
16 bodies from the starch granules so that they
17 can be used later on.

18 Here's another shot of what the
19 starch granules look like when most of the
20 protein bodies have been removed. You can
21 still see some dimples from them here.

22 So my time is mostly up, I'll say

1 thanks. But I just wanted to show what was
2 actually going on with that.

3 MR. GIACOMINI: Questions,
4 comments?

5 Thank you.

6 Silvia. Next is Paul in the room
7 yet? Okay, next up, Erin, is Erin in? Is
8 that Erin? Okay.

9 All right, go ahead.

10 MS. ABEL-CAINES: My name is
11 Silvia Abel-Caines, I'm a veterinarian and
12 dairy nutritionist with Organic Valley Co-op.

13 I would like to focus my comments
14 on the animal welfare and animal stocking
15 density. Consumers today are increasingly
16 concerned about the welfare of farm animals,
17 and we in the organic community have led the
18 way in this regard, and I believe we should
19 continue to make progress to get closer to a
20 more clear definition of what an appropriate
21 indoor space and outdoor pen should be.

22 A couple of considerations I would

1 like to make. First, there is need to be --
2 there needs to be some clear definition on
3 species-specific confinement spaces. The
4 language is not precise on what are the NOSB's
5 specific conditions in which a ruminant could
6 be temporarily confined. To improve its
7 health condition and to change the status, the
8 health status of the animal.

9 When we take a close look at the
10 table provided in the Animal Welfare
11 Discussion document under the dairy cattle
12 section we have the space calculation base in
13 body weight. For instance, 770 through 1,100
14 pounds called for a 50 square feet indoor
15 space. But in reality, these need to be
16 refined because, in a typical operation we
17 have maternity pens, we have sick pens, which
18 will require different settings depending on
19 the condition and the reason why the animals
20 are staying there.

21 Also what kind of ventilation is
22 assumed for this kind of spacing? For this

1 amount of square feet in a sick pen with two
2 to three 1,300 pound cows, the 25 parts per
3 million ammonia level will be quickly
4 surpassed. Given the documented effect of
5 ammonia on upper respiratory health
6 conditions, I would like to suggest that those
7 levels should be lowered to at least 20 parts
8 per million for organic production.

9 Along these lines, I want to
10 mention the recommended stocking area for
11 poultry which is set around two square feet
12 per bird. We at Organic Valley have found
13 that five square feet provide the best
14 stocking density to minimize parasite load,
15 protect the soil and keep ammonia levels at
16 minimum.

17 I also want to bring the point
18 that, when it comes to definition of adequate
19 shelter design to allow for adequate exercise,
20 freedom of movement and reduction of stress,
21 the language is not clear and it's overly
22 prescriptive. For instance, there is no

1 consideration for tie-stalls or stanchion
2 barns. I believe the recommendations that
3 should come should be a guide and the language
4 we use should be minimized so the confusion
5 between producers and certifiers is kept at
6 the minimum.

7 And on another subject, regarding
8 the use of nanotechnology, I will say that
9 nanomaterials should stay out of organic
10 production. We don't completely understand
11 their mechanism of action but we must
12 differentiate between natural and synthetics.

13 And with that I will take any
14 comments and questions.

15 MR. GIACOMINI: Questions and
16 comments? Jeff?

17 MR. MOYER: Not so much a question
18 but just to go on the record to say that, what
19 we're trying to do is, when you look at --
20 when you're talking about tie-stalls and
21 stanchions, that was already addressed in a
22 previous document that this Board approved and

1 passed on to the program. I don't remember
2 what the date was on that. But it's -- so
3 there's two parts to the document, the one
4 that's currently being reviewed by the public
5 and the livestock committee and then the one
6 that's already been approved by this Board.
7 So those two will have to be looked at in
8 unison.

9 And the other piece is, the
10 stocking densities that we're looking at,
11 while those minimums may seem very small in
12 some circumstances, what we're trying to do is
13 we're trying to partner that minimum stocking
14 density chart with an outcomes-based scoring
15 system. So the two go hand-in-hand. If, for
16 example, your animals are not meeting the
17 conditions scoring that we're trying to
18 achieve, you may have to have more space in
19 your particular operation.

20 We're trying to be non-
21 prescriptive and allow farmers as many
22 management options as they can find to achieve

1 those two outcomes. But we're also trying to
2 set a minimum on how tightly they could
3 possibly dense -- pack their animals under any
4 circumstances. I just wanted that on the
5 record. Thanks.

6 MS. ABEL-CAINES: Okay.

7 MR. GIACOMINI: Other comments?

8 Katrina?

9 MS. HEINZE: Thank you, Jeff.

10 That was totally helpful. That's the first
11 time I've understood that point.

12 MR. GIACOMINI: Okay. Is Paul
13 here yet? If anyone knows Paul, if they could
14 go fetch him, that would be wonderful.
15 Otherwise he's going to miss out.

16 Erin, Dave Engel, is Dave still
17 around?

18 MR. ENGEL: Yes.

19 MR. GIACOMINI: Okay, Dave, you're
20 next. And then we'll -- go ahead.

21 MS. FREIBERG: Good evening, my
22 name is Erin Freiberg. I don't have a lot to

1 say so I'll probably be giving you some of
2 your time back. Hopefully that's appreciated.

3 I'm a mother of three kids under
4 the age of six and I'm a consumer of organic
5 foods. I'm here today and I've waited for a
6 couple of hours just to get the chance to talk
7 to you all and urge you to pass -- to issue
8 meaningful standards regarding outdoor access
9 for organic laying hens.

10 Now as an egg consumer, I'm just
11 kind of -- I'm not a scientist, I'm going to
12 bring you back to sort of a everyday shopping
13 experience. I'm confronted with numerous
14 labels at the grocery store, and I'm sure
15 you've all seen them also. Antibiotic free,
16 cage free, vegetarian fed, free range, the
17 list goes on. But I know, as a knowledgeable
18 consumer, that none of these labels is
19 required to be certified by a third party.
20 The only really meaningful label for me is the
21 one that reads USDA certified organic, that
22 you all are responsible for.

1 Now this label, let me remind you,
2 because you're hearing from a lot of different
3 stakeholders here, it's not primarily for the
4 benefit of the producer, it's for the benefit
5 of the consumer. Consumers like me that are
6 in the grocery store and are looking for a
7 certain standard. The certified organic label
8 enables the consumer to choose to support
9 agricultural practices that align with what
10 they value.

11 I know that consumers purchase
12 organic foods for a variety of reasons, but a
13 major reason why I purchase organic eggs and
14 other organic animal products specifically is
15 because I believe animals should be raised in
16 a way that allows them to exhibit their
17 natural behaviors. For laying hens, this
18 includes being able to go outside to forage
19 for grit and insects and other things. I
20 understand that large egg production factories
21 have achieved economies of scale that allow
22 them to produce far more eggs for a far lower

1 price in high intensity indoor facilities.

2 But my family and many others like mine have
3 opted out of that and chose -- choose to pay
4 more to get our eggs from farmers who allow
5 and encourage their hens to go outside.

6 Now I know that under the current
7 rules there are some large organic egg
8 producers who don't provide meaningful access
9 to pasture. They provide maybe a small door
10 for outside access and the birds never
11 actually go outside. Or else the birds are
12 allowed to go on small porches, maybe
13 sometimes even elevated on a couple of levels
14 as we heard previously.

15 Frankly, it disgusts me. It
16 disgusts me that producers are basically
17 allowed to manipulate these rules or take
18 advantage of the ambiguity, I should say, to
19 deceive consumers. I feel like it really is
20 deception. I feel like these producers are
21 essentially scamming me into paying more for
22 nothing, and I really resent that as a

1 consumer. I deserve better. Other consumers
2 deserve better in our organic label, and it's
3 up to you to provide it and make sure it
4 happens.

5 If you fail to issue strong
6 outdoor access regulations, the certified
7 organic label will no longer live up to its
8 name, and it will just become another useless
9 label that we see on our egg carton. I, for
10 one, know that I would rather not have to
11 raise my own hens in addition to raising my
12 children, so I need the help of this body to
13 ensure that I can make a meaningful choice
14 when I purchase organic food. We consumers
15 need you to issue a strong outdoor access rule
16 that requires more than two feet of space per
17 bird. I know there are farmers that currently
18 provide much more than that and will be happy
19 to comply with such a rule. We also need you
20 to require outdoor access to be to soil rather
21 than an artificial porch. And if that means
22 that some of the large conventional egg

1 factories cannot go organic or some existing,
2 quote, unquote, organic farms can no longer be
3 certified, so be it. I'd rather purchase my
4 eggs from a farmer that truly cares about
5 organic livestock practices, even if that
6 means I have to continue to pay a premium.

7 Thank you so much for your hard
8 work, for staying tonight and for taking these
9 comments into consideration.

10 MR. GIACOMINI: Questions and
11 comments for Erin? Katrina.

12 MS. HEINZE: I just wanted to
13 thank you so much for your comments.

14 MS. FREIBERG: Yes.

15 MR. GIACOMINI: Okay. One second,
16 Paul? Is Paul here? Okay. Dave first, then
17 Paul then Will.

18 MR. ENGEL: Is this thing working?
19 I don't think it is, is it?

20 Want me to come over there?

21 MS. BRINES: Yes.

22 MR. ENGEL: Okay. My name is Dave

1 Engel. I'm a dairy farmer and that's where my
2 comments are coming from primarily this
3 evening. I also have been informed with 20
4 years of working for different certification
5 agencies and that is definitely informing my
6 comments also.

7 And I am struggling to find a way
8 to share with you tonight what I'd like to.
9 It has to do with pasture. Gary Zimmer here
10 a few minutes ago shared a little bit of it in
11 a nutshell. Gary Zimmer, an Otter Creek
12 organic farmer at 24 percent on the dry matter
13 intake, and it's October right now, or they
14 were on the day of their inspection. And on
15 Sunday, the Millers were at 35 percent. These
16 are two premier farms here in Wisconsin, in
17 the Midwest. They are in the know, they have
18 resources that most farmers do not have,
19 millions of dollars, and they're just scraping
20 by.

21 Most of you know that from the
22 beginning I have not been in favor of numbers.

1 They're problematic when one does not heed
2 them. There have been few numbers in the rule
3 to date, the three years, 36 months free of
4 prohibited materials, 12 months organic
5 management of a dairy cow before shipping
6 organic milk. Having to keep records for five
7 years, the 90/120 day raw manure restriction
8 for food crops, the specs that were put in the
9 rule for -- from the EPA for producing safe
10 compost. And then there's a couple of other
11 one-year mentions in the rule. For example,
12 under seeds, for planting stock and then the
13 obvious, 100 percent, 95.5 percent, greater
14 than/less than 70 percent labeling. These
15 numbers have made sense from the beginning,
16 they worked. And they are what I call
17 production neutral. In other words, they are
18 broad, well-founded baselines that all
19 operations must meet and they are not size
20 biased.

21 But the numbers in the new pasture
22 rule, from the beginning, are meant to get the

1 big guys. With the expectation that smaller
2 producers, of course, would have to comply --
3 could comply. As it's turning out, the
4 opposite is happening as the big guys have the
5 resources, and I have not heard anything to
6 prove otherwise, that they're having any
7 problems with it. In fact, I've talked with
8 one of them, the one operation that has -- I
9 don't want to go in that direction too far.

10 Anyway, the numbers in the rule,
11 though, that we have now. For example, a
12 grazing season number must be established,
13 plus the number of pounds, weight of the
14 animals must be known. Drainage and dry
15 matter to matter numbers must be established,
16 and then the number of pounds of feed adjusted
17 to a dry matter basis that are being fed when
18 not on pasture, and must be established, to
19 which must be compared then the number of
20 pounds, feed adjusted to a dry matter basis
21 being fed when on pasture, and at which point
22 the difference in grazing must be greater than

1 that 30 percent and that greater than 30
2 percent number has to be averaged out over
3 their established grazing season number, which
4 number must be a minimum number of 120 days.

5 And all of these numbers must be calculated
6 for each of the different parts of the grazing
7 season, early, mid-early, late-early, mid,
8 early-mid, early-late, mid-late, late-late.

9 And all of these numbers must be calculated
10 for each of the different age and weight
11 groups and similarly, for the different parts
12 of the grazing season, for each of those
13 different age/weight groups, as above and as
14 applicable. And that's just for the 3126.
15 There are another 10 to 15 numbers the pasture
16 rule brought in.

17 If those numbers don't work for
18 you, then there are other methods that the
19 USDA and the NOP, in their graciousness, have
20 provided and which you can use, but they are
21 much more involved and difficult to both
22 understand and to do. And then, of course,

1 whichever way you choose must be documented so
2 that a certification agency can come out for
3 a few hours once or twice a year and see if
4 you're meeting the numbers.

5 As you can see, it's not so simple
6 anymore. I don't have a whole lot more to
7 say. I'm personally meeting -- I've got four
8 groups of animals and I'm meeting minimum on
9 three of them, I think, I hope. I've got, you
10 know, a system of documentation that I'm
11 doing, one of them I'm not meeting it on. And
12 you know, there's questions that the
13 certifiers are having and are in discussions.
14 A big one centers around
15 correctable/noncorrectable. But I'll stop at
16 that. I think I've made my point.

17 MR. GIACOMINI: Questions or
18 comments? Kevin?

19 MR. ENGELBERT: Dave, I'd just
20 like to comment in case you're worried about
21 me. We have 300 animals. I did all those
22 calculations, we meet that requirement with no

1 problem whatsoever. The 30 percent, 120 is a
2 -- guarantees a minimum of 10 percent of the
3 animal's -- a ruminant animal's feed for an
4 entire year, comes from pasture. What -- how
5 much of their feed do you think should come
6 from pasture in a year? And lastly, as you
7 know, my wife works for a certification agency
8 in New York. They have no super -- all their
9 farms would be considered small, and every one
10 of their farms is in compliance in 2010 with
11 the new pasture rule.

12 MR. ENGEL: Yes, I -- it is very
13 little time to try to express all the nuances
14 of what I'm trying to say, Kevin. I am in
15 support of trying to make this work. I do
16 know that one of the things I would have said
17 if had I gotten to it is, I think there's
18 going to be 20 percent of the farmers, none in
19 New York, thank goodness, that are -- that
20 could be in a major non-complaint situation.
21 And I will bet that there's 10 percent of the
22 dairy farmers in the United States will be

1 having proposed sanctions against them, not
2 just major noncompliances. The Midwest is not
3 set up for this, it's not. We just haven't
4 done it. And you know, I'm saying let's go
5 ahead with it, obviously we are. But the part
6 that I got to in my comment here was, the
7 certifiers are the ones that are going to have
8 to be managing this and we just -- the idea of
9 continual improvement is not built into the
10 numbers here. That's what I said right at the
11 beginning. When you have numbers that are
12 there and you don't meet them, then in this
13 case here, we're out. So --

14 MR. GIACOMINI: Joe.

15 MR. SMILLIE: I would respectfully
16 ask everybody to leave the mic in the holder.
17 My ears hurt, a little sensitive at this
18 point, but that's okay.

19 But the other thing is, you know,
20 that's what -- that's what the badges said at
21 the pasture symposium. That's what the badges
22 said, they had those numbers on them. I

1 remember the pasture symposium, one of my
2 first NOSB meetings as a member. The badges
3 said 30 -- you know, 30/120. So it was a
4 community that demanded the numbers and now
5 we've got to live with them.

6 MR. GIACOMINI: Thank you. Okay,
7 Paul and then I think I'm still up on the
8 right order -- Paul and Will -- are we Paul,
9 Will and JoAnna. Jim -- no, JoAnna. Okay,
10 Paul, Will and Jim. Well, Will needs to be
11 there next. So Paul, you go ahead. Will will
12 be after you and we'll figure out who is left.

13 MR. HABHAB: Thank you,
14 distinguished Board members. My name is Paul
15 Habhab, I'm director for Islamic Services of
16 America, founders basically of the Halal
17 industry in North America since 1975. We have
18 worked with the USDA, FDA over the years to
19 develop credible, authentic and responsible
20 Halal programs. Beginning I suppose in 1976
21 with Tamu Beef Pack and also with Louis Rich
22 in 1978, with turkey.

1 Regarding animal welfare and the
2 policies by the Organics Board, again we want
3 to applaud the efforts of the NOSB to improve
4 the understanding and compliance with humane
5 animal care standards. But we also want to be
6 sure that these standards are also in
7 consideration of religious production
8 standards. There are a great number of
9 parallels between Halal and organic, as well
10 as with kosher. However, when we look at
11 proteins in that -- in those productions and
12 processes, things become or can become a
13 little more challenging by differences in
14 opinions.

15 With regards to stunning, it is
16 specifically written within the religion in
17 Halal criteria that animals may not be subject
18 to blunt force or bludgeoning or otherwise
19 what would equate or similarly to captive bolt
20 stunning, which is outlined in this version of
21 the standard that I received. The one thing
22 that I didn't see any clarification on,

1 relative to captive bolt stunning was whether
2 it was penetrative or non-penetrative. And I
3 apologize if it's already been pre-written and
4 I didn't see this. But I would think that
5 whether we're talking about penetrating or not
6 penetrating the skull on the animal should be
7 something of a critical point to at least
8 address.

9 When we -- our organization
10 understands that USDA intends to double its
11 exports in the coming years. Global Halal
12 industry is a \$2.3 trillion industry. In the
13 global economy, the Muslim world, whether
14 we're talking about Southeast Asia, Indonesia,
15 Singapore, Malaysia even Brunei and Thailand,
16 as well as the Gulf, the Middle East, GCC
17 region, UAE and so forth, they are demanding -
18 - and these are extremely lucrative markets,
19 and they are demanding Halal and that the
20 products that come in there are in accordance
21 with Halal standards.

22 I remember hearing some of the

1 other speakers that said, when you look --
2 when a consumer looks at the package and says
3 on the label and it says organic that it means
4 something, it means something specific. And
5 while there are exclusions or opportunities
6 for Muslims or consumers of Halal foods to eat
7 foods that are not specifically Halal, those
8 are under other -- a whole other set of
9 criteria and need to remain separate. Because
10 when you look at a product and it says Halal,
11 it means something very specific, just as the
12 organic label does.

13 I can't expect to educate or
14 inform -- pardon that word educate -- but
15 inform everyone about the criteria of Halal
16 and relative to Halal. But it is very simple.
17 We have been very successful. We have
18 dedicated plants, we operate in batch
19 production facilities, from beef to lamb to
20 veal to turkey, poultry, chicken, duck, et
21 cetera.

22 I just wanted to provide the

1 information on who we are and that we can and
2 we'll be more than happy to provide additional
3 information and resources for proper
4 development of Halal within the National
5 Organics standards. Thank you.

6 MR. GIACOMINI: Kevin.

7 MR. ENGELBERT: Paul, we
8 appreciate the information. That's part of
9 why we have kept these as discussion
10 documents. We're looking for input from the
11 public, but we're not trying to gear these to
12 any specific -- any other specific standard.
13 If Halal falls in with the standards we come
14 up with, that's fine, but that's not our goal.
15 We appreciate your input, we appreciate input
16 from any other group of people. But I just
17 wanted you to be sure that, you know, we're
18 not trying to meet your standard or anybody
19 else's. We're trying to come up with our own
20 standard for organic handling, transport and
21 slaughter.

22 MR. HABHAB: Sure.

1 MR. ENGELBERT: Okay.

2 MR. HABHAB: Understood, thank
3 you.

4 MR. ENGELBERT: Yes.

5 MR. GIACOMINI: Is there -- okay,
6 Joe, go ahead.

7 MR. SMILLIE: My understanding
8 earlier, when I mentioned about the kosher
9 stunning thing, you guys have already moved on
10 that, though, right? That that's under
11 consideration already, to have other methods
12 other than the stunning that are --

13 MR. HABHAB: Yes.

14 MR. SMILLIE: Okay.

15 MR. MOYER: Are you considering --

16 MR. GIACOMINI: Jeff, mic.

17 MR. MOYER: We're considering
18 everything, Joe. Like I said, we want input
19 from everybody. We're not trying to exclude
20 any type of anything, but we're also not
21 trying to accommodate specific, you know,
22 requirements of any other organization or

1 group of people. We're trying to set the
2 standard for what all consumers expect with
3 the organic label.

4 MR. SMILLIE: And so once kosher
5 and Halal organizations understand what you're
6 doing, they can have specific -- they'll look
7 at their standard and see which things would
8 bar and they can send that input to you.

9 MR. GIACOMINI: Program?

10 MS. BAILEY: Melissa Bailey. I
11 just wanted to raise attention to the Board
12 that there is a federal humane slaughter act,
13 and there are certain exemptions under that
14 federal act for ritual slaughter that you
15 would maybe want to take a look at as you're
16 entertaining what you're working on.

17 MR. HABHAB: If I might --

18 MR. GIACOMINI: Yes, go ahead.

19 MR. HABHAB: -- real briefly. We
20 really have a great respect for Dr. Temple
21 Grandin in the work that she's done over the
22 years. We have been big proponents of her

1 work, her kill methods as well, and her boxes
2 and her restraint units. And we really think
3 that the use of a restraint method, especially
4 if we're talking about beef, of course it's a
5 completely different process than poultry.
6 But stunning really serves very little
7 purpose, if the procedures are done correctly.

8 MR. GIACOMINI: And has Temple
9 looked at these and -- I mean, have you worked
10 with -- has your organization worked with --

11 MR. HABHAB: We're currently
12 corresponding with Temple --

13 MR. GIACOMINI: Okay.

14 MR. HABHAB: -- because of the
15 Halal industry, to -- so that she can actually
16 see a correct, proper, authentic Halal
17 slaughter. We've been under scrutiny by -- I
18 won't say scrutiny, but we've been very
19 closely watched by USDA. I mean, it's very
20 sensitive. This whole entire industry is very
21 sensitive, especially after Westland, you
22 know, several years ago. But we have been

1 able to very easily satisfy the curiosity of
2 any inspectors that are curious as to what --
3 if the procedures are done correctly, the
4 animals are rendered insensible extremely
5 quickly without -- there are -- have been
6 previous studies.

7 There's an old study in '97 that
8 was done in Europe where they said there was
9 two and a half minutes of massive brain
10 activity with -- via captive bolt stunning
11 versus very limited brain activity for a
12 period of less than 30 seconds, without
13 stunning, with a proper cut. We're in the
14 process of recreating that study. I can't
15 elaborate on the university that we're working
16 with at this point in time, but basically
17 recreating that study and adding -- to
18 understand what aversion is, what brain
19 activity is, so on and so forth.

20 But Temple has done a great amount
21 of work, and I think that's a good basis for
22 any standard that you guys are establishing.

1 And I hope that we can find parallels between
2 organizations and find that neither -- whether
3 -- I won't say organizations, but industry
4 segments, whether we're talking about Halal or
5 kosher or organics or whatever, that neither
6 one of us present ourselves as a barrier to
7 the industry and the consumer. That's all.

8 MR. GIACOMINI: And we don't want
9 to become a barrier for you to participate in
10 that with us, either. So any further
11 questions or comments? Go ahead, Wendy.

12 MS. FULWIDER: I just wanted to
13 say that I have discussed this with Temple,
14 and there are humane ways to do the Halal
15 slaughter. So that's really not a problem.

16 MR. GIACOMINI: So we should be
17 able to get those as this develops from the
18 discussion document, get those more concretely
19 and in acceptable format?

20 MS. FULWIDER: Yes, yes.

21 MR. GIACOMINI: Okay. I think
22 we'll be able to work this out.

1 MR. HABHAB: Thank you.

2 MR. GIACOMINI: Thank you.

3 Okay. Will, Luis and Reg.

4 MR. FANTLE: Joe, may I ask you to
5 shield thy ears while I adjust the mic here?

6 MR. SMILLIE: Okay.

7 MR. FANTLE: Thank you. My name
8 is Will Fantle, I'm the co-director of
9 Cornucopia Institute. Since we presented our
10 testimony on Monday, we've had another 189
11 signed letters come in from stakeholders in
12 organics around the country on the poultry
13 issue. I'm going to leave those with staff.
14 I'm not sure that we passed around a copy of
15 the letter for the Board to review, I will do
16 that as well.

17 I've got a couple of areas that I
18 want to talk about, and I won't use up my five
19 minutes. The first area deals with testimony
20 that was provided earlier this afternoon by
21 Martek --

22 MR. GIACOMINI: Excuse me, Will.

1 Could we have a little order, a little more
2 order? We realize it's getting late and we're
3 all distracted. But let's try to keep down on
4 the additional discussions and give the
5 attention to the speaker.

6 MR. FANTLE: Thank you.

7 MR. GIACOMINI: Please.

8 MR. FANTLE: Earlier this
9 afternoon, there was a representative from
10 Martek Biosciences that asked for a science-
11 based approach as we assess the accessory
12 nutrients and in particular the DHA-ARA issue.
13 We totally agree. We think that it's the way
14 to go, a science-based approach, and we
15 welcome that and encourage you to take that
16 approach to this issue.

17 We don't have a pony in this show,
18 a horse in this game, a dog that we're
19 backing. We don't make nutritional
20 supplements, particularly those made from soil
21 fungus or algae, so we're totally open to a
22 discussion of this and a look at this through

1 the lens of science. And we would encourage
2 you to adopt that approach.

3 Just for the new Board members
4 that have taken their seats since January of
5 2008, when we released a report replacing
6 mother imitating human breast milk in the
7 laboratory, we included a rather detailed
8 appendix in there of peer reviewed scientific
9 studies. We'd be delighted to provide that to
10 any of the Board members who haven't seen
11 that. If not, you're certainly welcome to go
12 to our website, there's a free download there.
13 Our lead researcher on that has advanced
14 degrees from Harvard and Tufts and she, too,
15 is interested in participating in the science-
16 based approach that has been asked for today.

17 The other area I'm just going to
18 briefly comment on is the poultry issue.
19 There was a discussion today about porches.
20 And when the decision was made by the program
21 some years ago to approve the first porch, I'd
22 like you to recall or learn or know that this

1 decision was made without consulting with a
2 certifier reviewing the documents or
3 interviewing the inspector. We know this from
4 talking with people involved in that decision.
5 We also conducted a FOIA to obtain documents
6 from the program to help us understand how
7 that decision was made. Again, we would be
8 delighted to share these materials with the
9 Board if there's any interest in that. And
10 we're more than willing to do that.

11 Last remark, again, those that are
12 departing from the Board, thanks for your
13 service. This is a meat grinder of a job.
14 I've talked with former Board members and
15 current Board members about the amount of time
16 and effort and energy that's required between
17 meetings, for your committee meetings, reading
18 of documents, and we appreciate that. And
19 hopefully those that are interested that are
20 coming on the Board will still be willing to
21 do that because we know it's a lot of work.
22 So, thank you.

1 MR. GIACOMINI: Thank you.

2 Questions, comments?

3 (No response.)

4 MR. GIACOMINI: Thank you for the
5 kind words, we appreciate it.

6 Luis and Reg. Reg, are you here?
7 Reg? Gregg Stevens? I'm not sure which one
8 you are.

9 MR. STEVENS: Gregg.

10 MR. GIACOMINI: Okay. Go ahead.

11 MR. MONGE: Thank you. I'm going
12 to try to take your attention for the
13 following five minutes. My children in here
14 brought me this evening from Costa Rica. My
15 name is Luis Monge, I work with Dole. And in
16 order to express our support, the support of
17 the whole industry, to the petition presented
18 weeks ago by the company to amend the National
19 List to include gibberellic acid on their
20 205.605.

21 These bananas made the trip from
22 Ecuador to the States and this is happening

1 every week. The main organic banana producing
2 countries for the U.S. market are Peru,
3 Ecuador and Colombia. Bananas are a
4 perishable crop, once bananas are harvested
5 they have a limited shelf life. The shipping
6 time from the tropics to the U.S. market could
7 take from 15 to 21 days depending on the
8 logistics. Some fungus and diseases have an
9 effect over the banana's natural ripening
10 process.

11 One of those fungus, by far, is
12 the main concern in this, it's the fungus
13 known as black sigatoka. Black sigatoka
14 appears during the rainy season and rainy
15 season could mean from three to six months a
16 year in the tropics. And it means a -- or the
17 black sigatoka has the effect to make the
18 bananas ripe very fast. And in order to
19 prevent the ripenings, the banana producers
20 reduce their harvest and age of the fruit and
21 the number of banana fingers per stem. It
22 means that they are reducing the weight of the

1 stem and the yield of the plantation, and then
2 their income.

3 Quality claims during the ripening
4 -- no, quality claims due to ripeness can be
5 found all year round. Gibberellic acid, a
6 plant growth regulator found in plants, is
7 commonly used in conventional banana
8 production to prevent early ripeness problems.
9 Gibberellic acid is applied to the cluster
10 crown to the plants' fruit and increases the
11 shelf life of the product. Applying
12 gibberellic acid will mean one week more in
13 the shelf life of the bananas.

14 Gibberellic acid is a natural
15 byproduct of the fungus, known as gibberella
16 fujikuroi. Some presentation of gibberellic
17 acid are only registered and thus allowed to
18 be used in organic production. The use of
19 gibberellic acid in banana -- in organic
20 banana processing, post-harvest, is necessary
21 to prevent one of its major quality problems,
22 early ripeness. Without the use of this

1 substance, the producer's income is strongly
2 affected by a reduction in the plantation's
3 yield and the quality claims. The whole
4 industry is affected by a reduction in the
5 offer, the quality claims and the increase in
6 the production cost.

7 So we will see you in April when
8 the -- this issue will be hopefully on the
9 floor. Thank you.

10 MR. GIACOMINI: Joe.

11 MR. SMILLIE: You're asking for it
12 to be added as a post-harvest handling to 605?

13 MR. MONGE: Yes.

14 MR. SMILLIE: You're not asking
15 for it to be on 601?

16 MR. MONGE: No.

17 MR. SMILLIE: No?

18 MR. MONGE: No, it's already
19 considered a non-synthetic.

20 MR. SMILLIE: Okay. So it's
21 already considered non-synthetic, natural --

22 MR. MONGE: And there is a

1 document that is found -- that can be found on
2 your database that the gibberellic acid is
3 considered as non-synthetic.

4 MR. SMILLIE: Okay.

5 MR. MONGE: So out of the scope of
6 the National List of the program.

7 MR. SMILLIE: So you're going to
8 be requesting it to be added to 605(a)?

9 MR. MONGE: It's already allowed
10 to be used as a crop use.

11 MR. SMILLIE: Okay.

12 MR. GIACOMINI: Katrina?

13 MS. HEINZE: Thank you so much for
14 coming, and your comments. It is my turn to
15 confess that your petition got lost in the
16 Material Chair's email. So --

17 MR. MONGE: I would be happy to
18 submit it again.

19 MS. HEINZE: No, no, I found it.
20 We will be dealing with it post-haste.

21 MR. MONGE: We're praying that we
22 will meet the 145 days requirement.

1 MS. HEINZE: So we will see what
2 we can do, but there was some confusion about
3 which committee needed to handle it, so the
4 materials committee will be talking about it
5 at our next meeting.

6 MR. MONGE: Thank you.

7 MS. HEINZE: It's already on the
8 agenda.

9 MR. MONGE: Thank you, thank you.

10 MR. SMILLIE: Gibberella is on my
11 computer and is already slowing it down.

12 MR. GIACOMINI: Okay.

13 MR. MONGE: May I make my final
14 comment?

15 MR. GIACOMINI: Yes.

16 MR. MONGE: I want to thank for
17 all the energy that you are putting during
18 this week on this meeting. I am maybe one of
19 the biggest fans of you guys, you can -- maybe
20 you can recognize my face because I have been
21 present several times. And you will continue
22 to see me every time I consider that this is

1 needed, my presence here, to speak or present
2 a paper or something.

3 Believe me, if you were trying to
4 comply with the social standards that we have
5 to comply in Latin America, you won't make it.
6 You are working more than eight hours a day.

7 (Laughter.)

8 MR. GIACOMINI: Does that mean
9 we're invited to visit you in Costa Rica?

10 MR. MONGE: Absolutely.

11 MR. GIACOMINI: Okay.

12 MR. MONGE: Absolutely.

13 MR. GIACOMINI: Kevin.

14 MR. ENGELBERT: What purpose does
15 this serve, to give you the extended shelf
16 life that you need by applying that?

17 MR. MONGE: Well, it means that
18 you can leave the stem on the plant hanging
19 one week more. It is extremely necessary to
20 enlarge the time of the fruit on the plant in
21 order to make it grow and the thickness, the -
22 - I don't know how to explain that in English,

1 I'm sorry. But it is extremely necessary in
2 order to increase the yields and the quality
3 also, and to avoid the early ripeness. It
4 means that when you open the container at the
5 port of destination, the bananas are still
6 green. That's what we need.

7 MR. GIACOMINI: Okay.

8 MR. ENGELBERT: We have organic
9 bananas right now. We buy them every week
10 with no problems with quality whatsoever.

11 MR. MONGE: I brought a 14 pounds
12 of bananas this morning for you guys. I put
13 it on the desk. The problem is, this is
14 happening and this is affecting the economies
15 of the producers. In order to provide this
16 quality, the producers are sacrificing their
17 yields. It means that from one stem, maybe
18 one stem could be, let's say, eight hands.
19 Eight hands could be -- one hand will be three
20 of them, okay? So imagine that.

21 In order to comply with the
22 quality requirements, because the organic

1 consumers are not accepting anything less than
2 this, okay? So in order to provide this
3 quality, the producers are cutting the stem at
4 the hub in order to provide all the clusters
5 of the hands, that we comply with this
6 quality.

7 The problem remains on, during the
8 rainy season, the plant is seriously affected
9 by funguses. It makes the -- many of the
10 leaves of the plant will die. With few leaves
11 on the plant, the stem will grow less, and it
12 is -- the mature ripening process is affected.
13 It is shortened. So what we want to do is to
14 apply the gibberellic acid on the crown and it
15 will give the harvested fruit one week more of
16 shelf life. That is extensively proved by our
17 research department.

18 MS. BRINES: Jeff?

19 MR. MOYER: I've got to admit, I
20 guess I'm confused. If you're applying the
21 material to the ground or to the plant while
22 it is in the field, that is not a 605 item.

1 That would be 601, if it were synthetic. But
2 if it's already a natural, then you can
3 already do that. You don't need --

4 MR. MONGE: We apply the
5 gibberellic acid post-harvest. When this is
6 being processed, when this is being plucked.

7 MR. MOYER: I understand that.
8 But you're not applying it post-harvest to the
9 banana. You're applying it post-harvest to
10 the soil?

11 MR. MONGE: No, to the banana.

12 MR. MOYER: Oh, to the banana.

13 MR. MONGE: What we want to do is
14 to apply it here, in the crown, in the crown
15 of the banana, right here.

16 MR. MOYER: I'm sorry, I
17 apologize. You're applying it to the crown?

18 MR. MONGE: The crown.

19 MR. MOYER: How does that enable
20 the plant to support more fruit?

21 MR. MONGE: Sorry?

22 MR. MOYER: How does that --

1 MR. ENGELBERT: It's two different
2 uses.

3 MR. MONGE: It is already allowed
4 to be used as a crop input. But we want to
5 apply post-harvest.

6 MR. MOYER: Post-harvest, to the
7 fruit?

8 MR. MONGE: Yes.

9 MR. MOYER: Thank you.

10 MR. GIACOMINI: Okay. Thank you.
11 Gregg.

12 MR. STEVENS: Thank you for giving
13 me the opportunity to speak. My name is Gregg
14 Stevens and I'm a new certification specialist
15 with Vermont Organic Farmers, VOF. And I'm
16 speaking on behalf of Nicole Dehne who is the
17 program administrator there. She had to leave
18 a little bit earlier today.

19 First and foremost, we all wanted
20 to thank you for your hard work in covering so
21 many important topics. And regarding the
22 apiculture standards, VOF participated on the

1 ACA committee for apiculture regulations, and
2 generally are very supportive of this NOSB
3 recommendation. VOF currently has one
4 certified organic bee keeper that has been
5 certified to Vermont organic apiculture
6 guidelines since 2000, and it is of great
7 concern to us that the regulations for organic
8 honey and other apiculture products are
9 attainable and enforceable for all areas of
10 the United States.

11 Our current organic bee keeper has
12 hives in the northeast corner of Vermont, an
13 area that still has a great deal of
14 agricultural land and generally a low
15 population density. His forage zone is made
16 up of woodlands, hay field and some
17 residential lawns. We feel it would be an
18 unnecessary burden to ask this producer to
19 annually verify with every residential
20 property within the forage zone that they have
21 not used prohibited substances on their lawns.

22 Do they understand what prohibited

1 substances are? Are they willing to sign an
2 affidavit stating this? Do lawns in the
3 forage zone really post a serious risk to the
4 contamination of the honey? Our producer has
5 found that neighbors were more willing to sign
6 a restraining order or a get-off-my-property
7 affidavit. Not that Vermonters aren't
8 friendly, but many people are suspect to
9 having to sign off on a document such as that.

10 There is suggested language in
11 VOF's written comments that have already been
12 given, that could be considered for a
13 compromise, or perhaps requirements for
14 affidavits from land owners could be limited
15 only to those land owners who grow crops on
16 their land that can be expected to
17 significantly impact the bees. We recommend
18 the Board give certifiers the ability to make
19 decisions about risks in the forage zone that
20 may need to be evaluated on a case-by-case
21 basis. These potential risks can then be
22 mitigated by testing apiculture products for

1 chemical contamination.

2 In addition, it should be noted
3 that, although the original NOSB
4 recommendation required a four-mile radius
5 from the hive, it also had an allowance for
6 some non-organic land within that forage zone.
7 Of course, the plants from which the bees
8 collect pollen are important, it's what makes
9 them organic, but the forage zone is not
10 everything. Of course, standards for organic
11 apiculture products should be strict,
12 especially when it comes to hive management.
13 Organic bee keepers differ greatly from their
14 conventional counterparts when it comes to the
15 pesticides that are used to treat the hives.
16 Let's put the focus on -- put less focus on
17 the forage zone and more focus on the things
18 we can control.

19 And that concludes these written
20 remarks.

21 MR. GIACOMINI: Questions or
22 comments? Kevin.

1 MR. ENGELBERT: I spoke with a
2 certifier from MOSA this afternoon, and they
3 have a bee producer there that they certify
4 that has 47 residential neighbors that they
5 get an affidavit from. Does -- and have no
6 problem with it. How many does your producer
7 have?

8 MR. STEVENS: I don't know.

9 MR. GIACOMINI: Questions,
10 comments?

11 (No response.)

12 MR. GIACOMINI: Thank you. We
13 lost you, Lisa. What's the next one?

14 MS. BRINES: Stefan Hauke.

15 MR. GIACOMINI: Stefan, please.

16 MR. HAUKE: Good afternoon,
17 everybody. I need to correct that a little
18 bit. My name is Stefan Hauke, but I'm of
19 Hauke Consulting, which is a consulting firm,
20 and we have international companies to come
21 into the organic market here in the United
22 States. Lammsbrau happens to be one of my

1 clients.

2 I will just give you a little bit
3 of a background. Lammsbrau is a organic
4 brewery, the brewery is 230 -- 280 years old,
5 and they've been brewing organically since the
6 '70s, and they are certified organic since
7 1992 and they are at the forefront of organic
8 brewing in Europe, certainly in Germany. So
9 they have a lot of stake in the organic
10 processes.

11 Lammsbrau is available in the U.S.
12 for two years now. I guess they started in
13 2008 to export here. And we were at the show,
14 at the trade show, the Expo East a couple of
15 weeks ago, and we had a few attendees from the
16 show coming to us to ask the brewery about the
17 opinion on the organic hop petition.

18 Well, you know, we didn't want to
19 give the opinion there, so we decided to wait
20 a little bit and, you know, work on it and
21 give you an official opinion. And I'm very
22 glad that we were allowed to actually do that.

1 So we provided written opinion, which is right
2 here, five pages to read. So if you have some
3 time, I encourage you to do that. And I just
4 want to quickly summarize what the opinion of
5 the brewery is. Again, that is the leading
6 German or leading European organic brewery.

7 Now the opening statement of that
8 letter, and I'm just reading that for you, we
9 are concerned that the NOSB handling committee
10 recent recommendation to keep hops on the
11 National List until January 2013 unnecessarily
12 prolongs consumer confusion, continues to
13 damage the integrity of the organic beer
14 category as well as the USDA organic seal, and
15 unnecessarily inhibits the growth of organic
16 hop acreage. Furthermore, breweries selling
17 organic beers made with conventional hops have
18 enjoyed a substantial and unfair trade
19 advantage for three years at the cost of
20 breweries that choose to use organic
21 agricultural ingredients exclusively.

22 The current recommendation of the

1 handling committee will prolong this
2 unjustified trade advantage for another two
3 years, penalizing breweries who support
4 organic hop growers, the organic beer category
5 and the integrity of the National Organic
6 Program by using exclusively organic
7 agricultural ingredients in their organic
8 beers.

9 And I just want to give you --
10 it's a long document, I don't know if you have
11 time to read that, but I just want to give you
12 some key points the brewery believes are true.
13 Lammsbrau believes that the petitioner made a
14 compelling case that a wide variety and a
15 sufficient quantity of good qualities hops are
16 available. Lammsbrau concurs that it is
17 unreasonable to expect that all hundreds of
18 hop varieties should be available in organic
19 farms. Lammsbrau concurs that for most beer
20 styles, there are good organic hop substitutes
21 available.

22 Lammsbrau believes that the

1 breweries serious about developing and brewing
2 truly organic beers from organic hops will be
3 able to do so with the organic hop varieties
4 available in the market as proven by breweries
5 which already make organic beers of very
6 different styles with organic hops.

7 Lammsbrau, and that is very
8 important to the brewery -- Lammsbrau believes
9 that consumers have the right to know if an
10 organic product is made exclusively with
11 organic agricultural ingredients. Since beer
12 is not required to provide ingredient
13 information -- and no beer does, pretty much -
14 - on the label, consumers have no way to know
15 if a organic labeled beer is made with organic
16 or with conventional hops. This, in
17 Lammsbrau's opinion, is very problematic.
18 Many consumers buy organic foods to avoid
19 pesticides and other chemical processing
20 agents. The consumer enjoying an organic-
21 labeled beer has no way to know if she
22 consumes ingredients she actually wanted to

1 avoid in the first place by choosing organic.

2 Lammsbrau believes that beers made
3 from organic grains and with conventional hops
4 have a place in the market, and that place is
5 made with organic, whatever the grain might
6 be. This is already there and that could be
7 used. Lammsbrau is also concerned about the
8 public trust in organic beer and the integrity
9 of the USDA organic seal. Beer in its most
10 simple form is made from two agricultural
11 ingredients; malt and hops, plus water and
12 yeast. Lammsbrau is concerned that the
13 public, if it would become wide knowledge,
14 would have a hard time to accept that a beer
15 can be labeled organic if one of the two
16 agricultural elements was grown
17 conventionally.

18 And I just want to read to you the
19 last sentence of the letter, and then I'm
20 finished. We believe -- and that again is the
21 brewery. We believe that every additional day
22 hops remains on the list harms the integrity

1 of the National Organic Program, causes
2 consumer confusion and distrust, inhibits the
3 growth of organic hop acreage and promotes
4 brewers using conventional hops at the expense
5 of brewers using organic hops. For these
6 reasons, we support the petition of the
7 American Organic Hop Growers Association to
8 remove hops from the National List.

9 And that is signed by Susanne
10 Horne, who is the general manager of the
11 brewery. Thank you.

12 MR. GIACOMINI: Thank you.
13 Comments and questions? Joe.

14 MR. SMILLIE: You make great beer.

15 MR. HAUKE: Thank you.

16 MR. SMILLIE: No question about
17 it.

18 MR. HAUKE: And everybody is
19 invited to visit the brewery when you are in
20 Germany. It's very close by. Twenty miles.

21 MR. SMILLIE: We have reached, we
22 think, a solution that is a win/win for

1 everybody, and I really urge your company to
2 really promote and market its use of organic
3 hops for all these years. That's, you know,
4 a marketing advantage that you have over the
5 people who don't use organic hops, and you are
6 allowed to do that in the romance language,
7 and even on the ingredient panel, as I
8 understand the U.S. of A. So I think that's
9 the benefit that you can go forward with in
10 the marketing department.

11 But I think we have reached our
12 recommendation for January of 2013, I think
13 has been fairly well accepted by everyone, and
14 --

15 MR. HAUKE: Well the brewery
16 accepts the compromise and the brewery doesn't
17 necessarily like it. And this is, you know,
18 what the reasons the brewery thinks that's not
19 the case. But again, you know, that is the
20 comment of the brewery, which is the leading
21 organic brewery in Germany, and probably in
22 the world.

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MR. SMILLIE: Thank you.

MR. GIACOMINI: Thank you. Any
other questions?

(No response.)

MR. GIACOMINI: Okay folks, thank
you very much. And we're done.

(Whereupon, the above-entitled
matter was concluded at 6:59 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: US Department of Agriculture

Date: 10-27-10

Place: Madison, Wisconsin

was duly recorded and accurately transcribed under my direction; further, that said transcript is a true and accurate record of the proceedings.

Neal R Gross

Court Reporter

NEAL R. GROSS

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