

UNITED STATES DEPARTMENT OF AGRICULTURE

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NATIONAL ORGANIC STANDARDS BOARD

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MEETING

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MONDAY,
NOVEMBER 17, 2008

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The board meeting was held at the Savoy
Suites Hotel, 2505 Wisconsin Ave., NW,

Washington, DC 20007, at 9:00 a.m., Rigoberto
Delgado, Chairperson, presiding.

PRESENT:

RIGOBERTO I. DELGADO, Chair
JEFFREY W. MOYER, Vice Chair
GERALD DAVIS

STEVE DEMURI
KRISTINE ELLOR
KEVIN ENGELBERT
BARRY FLAMM
DANIEL G. GIACOMINI
JENNIFER M. HALL
BEA E. JAMES

HUBERT J. KARREMAN
TRACY MIEDEMA
JOSEPH SMILLIE
JULIE S. WEISMAN

STAFF PRESENT:

KATHERINE BENHAM
VALERIE FRANCES
ANDREW REGALADO

BARBARA ROBINSON
JUDITH RAGONESI
MARK BRADLEY
RICHARD MATTHEWS
ROBERT POOLER
SHANNON NALLY
RUIHONG GUO

VALERIE SCHMALE
TAMMIE WILLBURN
BABAK RASTGOUFARD
ZAHA LOMAX
SHAUNTA NEWBY

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(9:03 a.m.)

CHAIRPERSON DELGADO: After that understanding break, we are officially calling the meeting of the National Organic Standards Board to order. And we have a quorum. Everybody is in its place, and at this moment I will like to get straight into business and entertain a motion to approve today's agenda. It is my understanding that all the board members have had a chance and time to review it. And if there's someone who would like to move to approve the agenda, I will entertain that.

VICE CHAIRPERSON MOYER: I make a motion that we accept the agenda as posted.

CHAIRPERSON DELGADO: It's been moved and seconded to approve the agenda as posted. And we'll take a vote. All those in favor say aye.

(Chorus of ayes.)

CHAIRPERSON DELGADO: Opposed?

1 (No response.)

2 CHAIRPERSON DELGADO: Hearing
3 none, we have our agenda. Thank you for that.

4 The second point is my welcoming
5 remarks. And first of all, I want to welcome
6 all the board members, members of the Program,
7 as well as members of the public, very
8 familiar faces by now and new faces. All of
9 you are welcome.

10 It feels as if it's been only a
11 couple of weeks since our last meeting back in
12 November of '07, but that, to me, means two
13 things. We have been extremely busy, and time
14 has gone by very quickly. I think that the
15 main theme of these last four months, for us
16 at least on the board, has been focused on our
17 work plans and maintaining our priorities
18 straight and also finding ways of improving
19 our performance. I think we're doing better
20 ways of communicating among each other over
21 the phone, over the net; and we're also using
22 better tracking tools to make sure that we are

1 tracking our priorities as they should.

2 Above all, I think all of these
3 exercises have allowed us to focus more on the
4 issues and be more productive in that sense.
5 We've been providing responses and papers on
6 a timely manner, as our Executive Director
7 might highlight sometime. We've been
8 effective in following our action items and
9 identifying those action items. And also
10 we've been extremely professional I think in
11 discussing the issues and not letting our own
12 biases sometimes get in the way.

13 Throughout the last 12 months,
14 we've been able to produce up to 70 or even
15 more than 70 recommendations, and we've
16 clocked more than 200 hours of conference
17 calls and time on the phone. That doesn't
18 include the time that we're spending preparing
19 and doesn't include the time of the public
20 involvement in our work, and we appreciate
21 that.

22 The public has also been extremely

1 responsive. This session alone we've had over
2 360 comments that all of us have read and
3 reviewed carefully. Last May, we had 86
4 participants coming up to the forum and
5 expressing their views. And this session
6 we're expecting 91. So it's, by all means, a
7 great response and also a great deal of input
8 from the public, and we're grateful for that.

9 In summary, I think that this
10 board is extremely productive and effective.
11 And as our Executive Director likes to have on
12 many occasions, I think we continue to be the
13 best in class, and all of us should be proud
14 of that, and we thank you for that.

15 Okay. Having said that, I would
16 like to pause a minute to recognize one of our
17 members of our committee. Valerie?

18 MS. FRANCES: Welcome, everyone.
19 And I just received this news today myself.
20 Probably not everybody knows her, but I'm sure
21 many of us do and worked with her for many
22 years. Diane Joy Goodman passed Friday

1 unexpectedly. I won't go into any details
2 because I really don't know them, but I just
3 want to say that she was a joy to know, and I
4 always appreciated her good humor and insight
5 and just love of life. And she just was in
6 there doing all she could. And so I just want
7 to acknowledge that, and if we could just take
8 a moment of silence for her.

9 CHAIRPERSON DELGADO: We will
10 observe a minute of silence in memory of Diane
11 starting now.

12 (Whereupon, a moment of silence
13 was observed.)

14 CHAIRPERSON DELGADO: Thank you.
15 I'd also like to make an announcement. The
16 secretary, Dr. Katrina Heinze also suffered
17 an accident, a broken ankle, this past Friday
18 and is not able to attend this meeting and
19 sends her regrets and best wishes for all the
20 members in our productive session. I'd also
21 like to take the opportunity to send Katrina
22 best wishes for a fast recovery and someone

1 take good notes and make sure that she's up to
2 speed in terms of what happens here.

3 Introductions of individual Board
4 members. Traditionally, we'll start on that
5 side with Hugh Karreman, please.

6 MR. KARREMAN: I am Hugh Karreman.
7 My background is in, originally, soil and
8 science conservation and that morphed into
9 being a veterinarian. And I'm a vet in
10 Lancaster County with a lot of organic dairy
11 farms and work with many organic dairy farms
12 across the country.

13 CHAIRPERSON DELGADO: Thank you.
14 Mr. Engelbert?

15 MR. ENGELBERT: Good morning. I'm
16 Kevin Engelbert. I hold one of the producer
17 seats on the Board. (Speaking off mic.)

18 MS. HALL: (Speaking off mic.)
19 Good morning. My name is Jennifer Hall. I
20 serve on the consumer slot on the board. I
21 live in Spokane, Washington, and I'm currently
22 in the process of . . .

1 MR. DEMURI: Good morning. My
2 name is Steve Demuri. I live in California,
3 and I hold one of the handler positions on the
4 Board. I'm employed by Campbell Soup Company,
5 and this is my, I'm going into my third year
6 in January on the Board.

7 MS. WEISMAN: I'm Julie Weisman.
8 I hold one of the, the other handler position
9 on the Board. I am going into my last year on
10 the Board. I can't believe I'm saying that.
11 And my background actually is in social work
12 with a focus on groups, so you can imagine how
13 handy that comes in. For the last decade and
14 a half, I've been involved in flavor
15 ingredients and especially organic flavor
16 ingredients, both commercially for other
17 manufacturers and also private ones, as well.
18 And I'm glad to be here.

19 MR. GIACOMINI: My name is Dan
20 Giacomini. I'm from Middletown, California.
21 If you don't have to go there, there's no
22 reason why you would know where that is

1 because it's not on the road to anyplace. But
2 I serve as a consumer seat on the Board. And
3 being in the Bay area, which is probably one
4 of the more liberal areas in the country, I
5 always tell people that if you come from the
6 rest of the country as a Democrat you go to
7 San Francisco and you find yourself a
8 conservative.

9 So it's a very active place. I
10 contact and work with and try to communicate
11 with a lot of consumers. I'm an organic
12 consumer myself and my family is. And we try
13 and stay, I try and stay in touch with as many
14 of those, that group as I possibly can.

15 VICE CHAIRPERSON MOYER: My name
16 is Jeff Moyer. I hold a producer position on
17 the Board. I'm also currently the Vice Chair
18 of the Board. I'm the Director of Farm
19 Operations for the Rodale Institute in
20 Kutztown, Pennsylvania, and I manage my own
21 small farm on the side.

22 CHAIRPERSON DELGADO: Bea James?

1 MS. JAMES: My name is Bea James,
2 and I hold the retail seat on the Board. I've
3 worked in various aspects of retail from co-
4 ops to mass market to independent grocery
5 stores for over 20 years. And my favorite
6 past time is baking, and I used to own my own
7 pastry shop. And I only have a year left on
8 the Board, and I'm going to get back to making
9 chocolate stuff.

10 CHAIRPERSON DELGADO: I'd also
11 like to clarify that, in the absence of our
12 Secretary, the Vice Chair and the Chair agree
13 to request Bea that she functions as the
14 secretary for this session, and she has
15 gracefully agreed to that. Thank you. Going
16 on with Mr. Davis.

17 MR. DAVIS: My name is Gerald
18 Davis. I hold a producer seat on the Board.
19 I am a long-time organic farming agronomist
20 and work for a large family-owned vegetable
21 farm in California working with 40 different
22 vegetable crops and fruit: blueberries,

1 strawberries, tomatoes, green house crops.

2 It's a very diversified farm, and I'm happy to
3 be here to share whatever I can with this
4 Board and lend some assistance.

5 MS. ELLOR: I'm Tina Ellor. I
6 hold an environmental slot on the Board. I am
7 Technical Director of Phillips Mushroom Farms.
8 And I'm happy to be here, and I'm happy to see
9 so many familiar faces.

10 MS. MIEDEMA: My name is Tracy
11 Miedema, and I'm also happy to see so many
12 friends here this morning. This is the end of
13 my second year on the Board, which means it's
14 my fourth of ten meetings, and it is truly an
15 honor and a privilege to meet so many
16 intelligent and very interested people and do
17 the best I can to help with all of the causes
18 that we're working on.

19 My personal interest in food
20 really stems from growing up and eating wild
21 food in the rural Pacific northwest. I still
22 live far out in the sticks in Oregon, and I

1 keep bees. And my professional interest is
2 studying consumer behavior, and my graduate
3 work focused on consumer behavior in the
4 organic food industry. And I hold one of the
5 three consumer rep seats.

6 MR. SMILLIE: I'm Joe Smillie. I
7 hold the certifier seat on the Board, and I'm
8 Chair of the Certification, Accreditation and
9 Compliance Committee, which used to be a very
10 quiet committee and now is pretty active. I
11 was a college graduate that returned to the
12 farm, much to the consternation of my family
13 who fought for three years to get off the farm
14 and send somebody to get a degree. I was a
15 back-to-the-lander, an organic farmer, a
16 consultant, and then got into the regulatory
17 world thinking that the vision of organic
18 needed regulations.

19 So now I'm basically functioning
20 as a USDA bureaucrat and very interested in
21 all of the issues and very interested as I
22 watch the vision of organics change as it

1 becomes a regulation because, you know, 30
2 percent means 30 percent, not 29.8. And so
3 working with the regulations has been quite an
4 experience, and I'm looking forward to trying
5 to make sure that the regulations reflect the
6 vision of organics.

7 I'm also, I'm happy to say, proud
8 to be an American citizen and might even get
9 a flag one of these days. So glad to be in
10 D.C. As I woke up this morning on the eighth
11 floor the sun was rising over the Washington
12 Monument, and it's a whole new day and I'm
13 glad to be here.

14 CHAIRPERSON DELGADO: Lastly, our
15 newest member of the Board, Barry Flamm.

16 MR. FLAMM: My name is Barry
17 Flamm. This is my first year on the Board.
18 I'm serving as a Chair of the Policy
19 Committee, and I serve with Joe on the
20 Certification Committee and with Jerry on the
21 Crops Committee. It's been a very interesting
22 and exciting year so far, and I'm amazed about

1 how much work this Board does. I've been
2 involved in a lot of boards in my career, and
3 this one I think is pretty incredible.

4 My background is in forestry and
5 natural resource conservation and my specialty
6 now is biodiversity conservation, which is how
7 I earn some money to keep going as an
8 international consultant now. I usually work
9 in Asia and Africa and so forth doing
10 biodiversity conservation work.

11 I've been an organic farmer and
12 organic orchardist, which I really love doing.
13 I'm not engaged in that hands-on right at the
14 moment, which I miss and am going to get back
15 to. I appreciate, as Tracy said, this
16 incredible group of people that come here to
17 present their comments and also all their
18 written comments. I'm amazed at the
19 carefulness and thoughtfulness of all of it,
20 so it's very special. Thank you.

21 CHAIRPERSON DELGADO: Next, the
22 Executive Director, Valerie Frances. Will you

1 introduce yourself, please?

2 MS. FRANCES: Valerie Frances, the
3 Executive Director. And if you are signed up
4 for public comment and have something that you
5 want distributed or want to give me PowerPoint
6 presentations, just try to drag me down. The
7 public comment schedule is out on the table as
8 you're coming into the room. And when you're
9 on deck, try to be up here or, actually, if
10 you're on this side -- it's just a little bit
11 awkward because, you know, so you can check
12 it. If you've got something to distribute,
13 try to get them to me ahead of time. So far,
14 I really don't have any space to put anything,
15 so I'll just do the best I can and I'm sure we
16 all will.

17 CHAIRPERSON DELGADO: All right.
18 Thank you.

19 DR. ROBINSON: I'm Barbara
20 Robinson, Deputy Administrator for
21 Transportation and Marketing Programs and the
22 Acting Director for the National Organic

1 Program. And let's start with you, Bob.

2 MR. POOLER: Bob Pooler, National
3 Organics Program.

4 MR. REGALADO: Andrew Regalado,
5 National Organic Program, Compliance and
6 Enforcement.

7 MS. NALLY: Shannon Nally,
8 National Organic Program.

9 MR. BRADLEY: Mark Bradley, NOP,
10 Auditing, Accreditation, and Training.

11 MS. BENHAM: Katherine Benham,
12 National Organic Program.

13 MR. MATTHEWS: Richard Matthews,
14 Standards Development and Review.

15 MS. RAGONESI: Judith Ragonesi
16 with the National Organic Program, and I work
17 in Compliance.

18 CHAIRPERSON DELGADO: Can you
19 repeat your name, please?

20 MS. RAGONESI: Judith Ragonesi.

21 CHAIRPERSON DELGADO: Thank you.
22 Anyone else?

1 VICE CHAIRPERSON MOYER: Mr.
2 Chairman, hopefully the recorder could capture
3 those names. If they want to stop and --

4 DR. ROBINSON: Oh, I'll introduce
5 them when I do the NOP.

6 CHAIRPERSON DELGADO: Thank you.

7 DR. ROBINSON: Because we do have
8 a number of new staff.

9 CHAIRPERSON DELGADO: Very good.
10 Excellent. And, lastly, for benefit of our
11 secretary, I'm a producer from West Texas, and
12 you all will recognize my accent. I'm very
13 proud of it. I'm a parent of two kids. The
14 youngest of the family is 14 years old; and
15 the second, the oldest boy, is 17. We grow
16 different crops, and I have my family heavily
17 involved in that, including my father and
18 mother even on some occasions.

19 So that concludes introductions.
20 We are somewhat behind schedule, and we'll
21 move right into the Secretary's report.

22 MS. JAMES: Okay. I'll do my best

1 to represent Katrina's hard work here. The
2 Secretary's Report consists of the acceptance
3 of some of the minutes, so I would like to
4 move to accept the November 2007 voting
5 results.

6 CHAIRPERSON DELGADO: Is there a
7 second?

8 MR. KARREMAN: Second.

9 CHAIRPERSON DELGADO: Okay. It's
10 moved and seconded to approve the November
11 meeting voting results. The voting results of
12 November 2007; is that correct?

13 MS. JAMES: Yes, correct.

14 CHAIRPERSON DELGADO: So the
15 motion is to approve the voting results for
16 the November 2007 meeting. So we have a
17 motion now, and the motion is to approve the
18 voting results for November 2007. Any
19 discussion?

20 (No response.)

21 CHAIRPERSON DELGADO: No
22 discussion. Ready for the question? The

1 motion is on the question of approving the
2 voting results for the November 2007 results,
3 and we'll take a voice vote. All those in
4 favor, say aye.

5 (Chorus of ayes.)

6 CHAIRPERSON DELGADO: All those
7 opposed say no.

8 (No response.)

9 CHAIRPERSON DELGADO: Okay. The
10 motion passes.

11 MS. JAMES: Okay. Next is a
12 motion to accept the May 2008 meeting
13 transcripts.

14 CHAIRPERSON DELGADO: Is there a
15 second?

16 MS. HALL: Second.

17 CHAIRPERSON DELGADO: Jennifer has
18 seconded. Okay. And the motion is to approve
19 the May 2008 minutes.

20 MS. JAMES: Transcripts.

21 CHAIRPERSON DELGADO: Transcripts.
22 Sorry. And ready for discussion?

1 (No response.)

2 CHAIRPERSON DELGADO: No
3 discussion. Ready for the question. The
4 question is on the motion to approve the May
5 2008 meeting transcripts. Again, we'll take
6 a voice vote. All those in favor say aye.

7 (Chorus of ayes.)

8 CHAIRPERSON DELGADO: All those
9 opposed?

10 (No response.)

11 CHAIRPERSON DELGADO: Okay.
12 Hearing none, the motion is agreed to.

13 MS. JAMES: Okay. So a motion to
14 accept the May 2008 meeting summary, as well
15 as the voting results.

16 CHAIRPERSON DELGADO: Okay. Is
17 there a second?

18 VICE CHAIRPERSON MOYER: I'll
19 second that.

20 CHAIRPERSON DELGADO: Vice Chair
21 seconded that. Okay. It is moved and
22 seconded to approve the meeting summary and

1 results. Is there discussion?

2 (No response.)

3 CHAIRPERSON DELGADO: Ready for
4 the question. The question is the motion to
5 approve the meeting summary results. We'll
6 take a voice vote. All those in favor say
7 aye.

8 (Chorus of ayes.)

9 CHAIRPERSON DELGADO: All those
10 opposed say no.

11 (No response.)

12 CHAIRPERSON DELGADO: Okay. The
13 motion is agreed to, and I think that
14 concludes the Secretary's Report; is that
15 correct?

16 MS. JAMES: Yes.

17 CHAIRPERSON DELGADO: Okay, thank
18 you very much. And now to the next point. We
19 would like to invite Dr. Barbara Robinson to
20 provide us a report on the Program. As Dr.
21 Robinson makes her way up to the podium, I'd
22 like to point out two young ladies on the

1 right of the room.

2 MS. JAMES: Mr. Chairman, I have a
3 question. If we're not recording does that
4 affect the transcript?

5 MS. BENHAM: It's recording. She
6 has mics.

7 CHAIRPERSON DELGADO: The mics are
8 working.

9 MS. BENHAM: She has separate mics
10 at the table.

11 CHAIRPERSON DELGADO: I'll ask the
12 audience to be extremely careful, and I'll ask
13 Dr. Robinson to address the group without a
14 microphone.

15 DR. ROBINSON: I'm afraid to talk
16 now. In all these years, this is what it
17 took? This is all it took. Who knew?

18 Okay. Let me be brief, so we can
19 stay on schedule here. First of all, let me
20 make sure I do introduce my staff correctly.
21 Since we met in May, we have hired six
22 additional staff, bringing us up to 15, which

1 is a much nicer number to say for the National
2 Organic Program. We now have three branches
3 and three branch chiefs. So in addition to
4 Rick Matthews and Mark Bradley, who head up,
5 respectfully, Standards Development and
6 Accreditation and Auditing, we also have the
7 pleasure of bringing on Ruihong Guo. Ruihong,
8 would you please stand up? Thank you.
9 Ruihong is Branch Chief for Compliance and
10 Enforcement, our newest branch that we've
11 added to the NOP. In Ruihong's staff, we have
12 Valerie Schmale, Judith Ragonesi, Tammie
13 Wilburn, Andrew Regalado.

14 Then we also have Babak
15 Rastgoufard, who's on detail from the Office
16 of the General Counsel who's working on Rick's
17 staff. Shannon Nally, Shannon, you were on
18 board I think in May, correct? But Shannon
19 came from the Compliance and Analysis staff in
20 the Agency, so Shannon used to work on
21 appeals. So now we had to replace her and we
22 have done so, we think, quite capably with

1 Zaha Lomax way back there. So we're very glad
2 to have Zaha. She does not report directly to
3 me. However, she does work on the Appeals
4 Board of the NOP.

5 We also hired Shaunta Newby.
6 Shaunta, where are you? Oh, she's the young
7 lady that you see when you come and sign up
8 for public comment. She is the new secretary
9 for the NOP.

10 So we're pretty excited that we
11 have a lot more people. Still not enough, in
12 my opinion, but much better than in the past.
13 And that's thanks to getting a little more
14 money from Congress.

15 So, let's see, what else have we
16 done this year, besides hire new people? Oh,
17 well, we did publish the access to pasture
18 regulation on October 24, largely thanks to
19 Rick Matthews' very hard work over the past
20 couple of years. That comment period opened
21 on October 24th, and it continues until
22 December 23rd at this time.

1 Materials update. Let me see. We
2 have -- hang on. I'll tell you what we have
3 published. The proposed and final rules have
4 been published; Sunset 2008; the ANPR proposed
5 and final rules have been published; the 2011
6 Sunset; we have the ANPR published; the
7 November 2007 and May 2008 Board
8 recommendations, we're working on the proposed
9 rule. And the 606 final rule is being
10 redrafted; I'm not too happy about that, but
11 that's where it is.

12 On our budget, we are stuck with a
13 continuing resolution for fiscal year `09.
14 Right now, we have a continuing resolution
15 that goes through March. That's what was
16 signed by the President. I kind of expect
17 that, you know, well, we don't really expect,
18 we have no expectations at this point. I
19 don't have any other information to give you.

20 We do have a small increase in the
21 NOP budget in the `09 budget, but since we're
22 on a continuing resolution, you know, we have

1 no expectations to see that unless the
2 Congress, you know, does something otherwise.
3 But given the state of the economy, we're not
4 holding our breath on this.

5 ACA renewals, we are coming
6 through that process. We have most of the
7 2007 done, and we're working on the 2008 ACAs
8 that need to be renewed. We continually make
9 updates on the web site. I think we're pretty
10 much caught up with the domestic ACAs, and
11 there's a few foreign ACAs that we still need
12 to finish up on from 2007, and it's just a
13 case of getting, you know, catching up with
14 the AHRQ reports. So we're working on that.

15 Cost share. As you know, we did
16 get quite a big bump in cost share
17 appropriations from Congress, 22 million in
18 the national program through the Farm Bill.
19 And we did get the cooperative agreements out
20 to the states. And then we are going to do
21 some cost share re-invention. Rick is working
22 with Ruihong's group, and we do have some

1 plans to improve how we work with the states
2 on cost share and improve, you know,
3 management of that program over the next
4 couple of years.

5 And one last thing is NOP training
6 for certifying agents. We are going to spend
7 a significant amount of funding from the
8 Program in this coming calendar year out of
9 FY09, FY08/09 spending to really improve our
10 training for certifying agents. In the past,
11 we've only been able to do three training
12 sites per year. We will continue to attend
13 All Things Organic in the coming year, but I
14 don't think that's enough. What I'd like to
15 do is open up the NOP and make it available
16 first to certifying agents but then to anybody
17 who wants to know what does this regulation
18 really mean and what does it mean to be
19 compliant with this regulation. And the idea
20 would be to make the NOP operable and open
21 24/7.

22 So we have contracted with the AMS

1 Training Institute, which is just an excellent
2 resource available to us in AMS. And, in
3 fact, I asked Mark for his input, and he's
4 given us a template to use. I wanted to start
5 with the LSP because I think that is the root
6 of the regulation, but we'll get working on
7 that over the holidays. But we did have, you
8 know, a template that we could at least give
9 the Training Institute to get started with to
10 give them our sense of what we mean with
11 labeling.

12 The idea would be to take every
13 section of this regulation and break it down
14 and then put it together in a CD-ROM type of
15 format but also a way that we can reach every
16 certifying agent first, because that is our
17 first obligation of course, and then to make
18 training mandatory for all certifying agents
19 but then, of course, make it user friendly
20 enough so that, beyond certifying agents,
21 producers, handlers, and even consumers who
22 want to know what does it mean to be compliant

1 and what does it mean to be organic will
2 understand this.

3 And then, of course, it won't just
4 be, well, here's the CD, go. There will
5 actually be training seminars. There will be
6 actual hands-on training. But then this will
7 also be a way to reach people who can't get to
8 a session. As I said, we're going to spend
9 some significant amounts of funding with this,
10 but we had to start somewhere and we had to
11 start sometime. And I think now is the time
12 to do it, as we're coming through the first
13 round of certifying agent renewals and we can
14 see, you know, we can get some feedback from
15 the audit reports what is it we're seeing both
16 from the certifying agents and the on-site
17 inspections and what is it we need to be
18 communicating back to folks.

19 One of those, just kind of my own
20 personal reaction is that organic is a
21 conscious and a conscientious decision. You
22 know, you've heard me say that on Executive

1 Committee calls. And so the OSP is going to
2 be a significant component of this. We want
3 to see accurate check sheets. We helped
4 support those at the beginning, so we'll go
5 back and use those workbooks that were put
6 together. We will probably talk with and we
7 already have been talking with ATTRA about
8 using their site as a place to host this once
9 we're done, to host the training.

10 So we're just at the early stages
11 of this. We'll make it as live and
12 interactive as we can, and so we're kind of
13 excited about this.

14 But, at any rate, I've gone on a
15 little too long. But that concludes the NOP
16 update, Mr. Chairman. Do you have any
17 questions?

18 CHAIRPERSON DELGADO: Any other
19 questions? Mr. Smillie?

20 MR. SMILLIE: I think it's really
21 good news, Barbara. It starts to sound like
22 the long-awaited quality manual.

1 DR. ROBINSON: Yes, except there
2 will be many of them, Joe. There won't be
3 one. There will be one for every section of
4 the regulation.

5 MR. SMILLIE: Well, I think that's
6 really good news because that's what we're
7 looking for to create the consistency and the
8 whole idea of the training. And getting all
9 the certifiers with the same, you know,
10 interpretation is going to take a long time.
11 To work up the reg is going to take a long
12 time. So I think this is going to be a great
13 step.

14 The second thing I think is that
15 the relationship between the agents of the USD
16 and the USDA, we really need to work on that.
17 And if it's going to be a 24/7 thing, I think
18 that's going to start to solve a lot of
19 problems and we create a two-way communication
20 because I agree with you. A lot of times the
21 NOP trainings in the past have been good, but,
22 you know, some of the people who needed to be

1 there weren't there. So I think the mandatory
2 aspect I think is a good aspect, as long as
3 it's convenient. I know we've heard a lot
4 from some of the state programs this year, and
5 they're saying that, you know, it's too bad
6 that there won't be trainings this year, but
7 the real bottom line was their budget cuts
8 wouldn't even allow them to go anyhow. And I
9 think in this era of budget cuts we can't give
10 excuses to certifiers not to be on line.

11 So the idea of eventually creating
12 a 24/7 exchange and leveling of
13 interpretations is just going to be a really
14 excellent move. And I think I can speak for
15 the Certifier Committee in saying that I think
16 that we really look forward, as agents of the
17 USDA which is our single solitary position,
18 that we look forward to this kind of
19 cooperation.

20 DR. ROBINSON: Well, thanks. And
21 I think part of this, we're not going to wait
22 and put the whole thing together, too. We're

1 going to pilot this out. For example, we'll
2 get a piece of it done, and then we're going
3 to send it out and say, well, you know, how
4 does this look? Does it work? Are we
5 communicating? You know, so trust me when I
6 say, for example, we'll get the labeling one
7 done and it will be kind of, okay, here's what
8 we mean when we say you must do this, or if
9 we're following the inspector around or the
10 certifying agent around in a plant and we
11 pause the tape, the camera or something, and
12 say what did he just do or what's wrong with
13 this label? You know, and then we ship this
14 out, and they say, you know, okay, did
15 everybody get it? Because there's no point in
16 sending it out, of course, and everybody looks
17 at it and says, well, either that was like at
18 the fifth grade level or the five-year-old
19 level and, you know, that wasn't helpful, or
20 nobody would get it.

21 So we're going to do some test
22 marketing here, too, because we want to do it

1 right, and also we need something that is
2 easily update-able as we make changes because
3 it's also got to be cost effective, too. It's
4 got to be something that when we put it
5 together and it goes on the web that we can
6 also update it as we issue new guidance. For
7 example, there will be one on the National
8 List. Gee, guess what? It changes.

9 But I think you see the idea.

10 And, yes, part of this problem is access to
11 training. Quite frankly, not everybody goes,
12 or an agent will send one person, maybe not
13 even the person that needs it or something
14 like that; or the same person comes to all
15 three trainings or the same person comes year
16 after year after year.

17 But we're not getting the right
18 kind of, you know, training in my opinion or
19 in the Program's opinion or from the results
20 that we're seeing. Everybody needs to be able
21 to hear from the Program; and, likewise, the
22 Program needs to be talking to all of its

1 agents. And then the agents, of course, need
2 to be able to talk to their inspectors. And
3 there is no reason, in this age of
4 transparency, there is no reason in the world
5 why producers or processors couldn't look at
6 this and say, "Okay, do I meet the performance
7 standards? I want to know." Why not? If the
8 certifying agent or the inspector is going to
9 come out to this plant or this operation, "Am
10 I in compliance?" Why not? And why shouldn't
11 consumers be able to look at the labeling or
12 something else and say, "So what does it
13 mean?"

14 MR. SMILLIE: Just a short follow-
15 up. Barbara, any word on the Canada/US
16 equivalency talks?

17 DR. ROBINSON: Oh, yes. We are
18 trying right now just to set up another
19 meeting, a follow-up meeting. They've had
20 some, since their election -- we sent them a
21 document in mid-September to respond to some
22 other questions that they had, and so last I

1 heard we were trying to set up a meeting.
2 We're just waiting for them. We were going to
3 have a meeting this week, as a matter of fact.
4 And then they had some, what I heard was they
5 had some food safety issues that caused them
6 to ask could they wait until next week. So
7 we're just waiting for them to pick a date;
8 that's all. And we're ready to go whenever
9 they are.

10 CHAIRPERSON DELGADO: Hugh?

11 MR. KARREMAN: Thank you, Barbara,
12 for releasing the pasture rule. I think I can
13 speak for the Board on that or at least the
14 five of us who were on the Board back when the
15 guidance in February 2005 were put out.
16 Remember that way back then, that meeting, you
17 guys? And I thank you very much for a very
18 comprehensive rule, and it is not on the
19 agenda to discuss the pasture rule. It is
20 beyond the NOSB at this point. Just so
21 everyone knows, it's obviously NOP level, so
22 we're not going to be discussing it. But I

1 guess if people have public comment, that's
2 public comment and that's fine. But we have
3 a lot of other issues on the table to get at.
4 So I just want to say that.

5 And then just one other thing
6 would be, please, I strongly urge you to
7 extend the comment period for an extra three
8 months beyond December 23rd for the organic
9 community to -- 90 days beyond. In any event,
10 extend the comment period, please, so that the
11 organic community can digest it. It's a very
12 comprehensive document. It's very well
13 thought out, but it needs some work. And I
14 know, at least for my farmers back in
15 Pennsylvania, they are not on line, you know.
16 They basically get updated via, you know, word
17 of mouth or whatever. So please, please,
18 please do that, okay?

19 DR. ROBINSON: That's not a
20 problem, Hugh. We'll accept any requests and
21 any comments that's submitted to us. So
22 that's not a problem.

1 Now, I did forget one other thing,
2 Mr. Chairman. Dave Shipman, who is the
3 Associate Administrator for AMS, is going to
4 come down to the Board meeting probably around
5 10:30, and I will be happy to introduce him.
6 But he just wanted to meet the Board and just
7 say a few words and welcome you all here. If
8 you remember Ken Clayton, he retired, and so
9 Dave has taken his position as Associate
10 Administrator. Jim Link, who was the former
11 Administrator for the Grain Inspection Packers
12 and Stockyards Administration, has come over
13 to be our Acting Administrator now that Lloyd
14 Day has resigned and left the agency.

15 But, at any rate, Dave is going to
16 come down around 10:30 or so, give or take.
17 It depends on his schedule. So he'd like to
18 come.

19 CHAIRPERSON DELGADO: Steve, you
20 had a question.

21 MR. DEMURI: Actually, Bill asked
22 my question.

1 CHAIRPERSON DELGADO: Okay. Any
2 other questions? Bea?

3 MS. JAMES: I just want to make
4 one comment regarding your announcements. I
5 really want to applaud the NOP for looking at
6 improving the training and opening it up to
7 consumers, handlers, producers, anybody who's
8 interested, because, one, the transparency, as
9 you mentioned; and then, two, it just helps
10 with education, which is always a challenge at
11 consumer level.

12 DR. ROBINSON: We totally agree.
13 Everybody should know about this.

14 CHAIRPERSON DELGADO: Any other
15 questions? Tracy?

16 MS. MIEDEMA: When we produce
17 recommendations here, I sometimes wonder and
18 I think others wonder where they go.
19 Sometimes, it's clear that they're in process
20 and there's some sort of action, but if you
21 wouldn't mind just commenting a bit on what
22 the various paths are that these

1 recommendations take when they leave this
2 room.

3 DR. ROBINSON: Sure, sure. Of
4 course, your materials recommendations are
5 number one. Those take priority over
6 everything because that is the National List
7 and that's just the number-one priority.
8 Anything that, you know, that we have asked
9 you for would probably be number two in terms
10 of what we would work. So recommendations
11 that you made where we've asked you for
12 standards development, recommendations where
13 we've asked you, you know, we need more
14 collaboration, we need your input on this,
15 we're not going to move forward on something
16 unless you give us a recommendation, then, you
17 know, once you give us the recommendation, we
18 look it over.

19 Generally speaking, we will then
20 go talk, if we have some concerns about
21 whether or not it needs, whether we can issue
22 guidance versus whether or not it requires a

1 regulatory change, we'll go consult with OGC,
2 the lawyers, for legal sufficiency, and then
3 we'll act on it. If it's a recommendation
4 that you're making and it wasn't even we asked
5 for and we've just got a lot of other work
6 that we're working on, it may sit for a while.
7 You know, it's something that you want to do
8 but -- and, by that, I don't mean that it will
9 just sit because we don't care. It depends on
10 our level of interest. You may come up with
11 something that, like, "Wow, we hadn't thought
12 about that, but that's very interesting," and
13 then we may get to work on it.

14 Again, the same path would occur,
15 though, Tracy. We have to go talk to lawyers
16 to see is this, you know, is the way they've
17 written it or what they've written or what we
18 want to do about it, is there legal
19 sufficiency? Does it fall within the law,
20 fall within the regs? And then what do we
21 have to do? Do we have to write a regulation,
22 or can we issue guidance? What would we do?

1 So recommendations that you make
2 that really deal with governance of the Board,
3 how you will conduct yourselves, those sorts
4 of things, we don't really have much to do
5 with that. That's really more the purview of
6 the Board, and that's all right with us.

7 But bear in mind there is a limit
8 to our resources and there is a lot that we're
9 trying to do, as well. So, obviously, it can
10 take some time to get to those.

11 CHAIRPERSON DELGADO: Dan?

12 MR. GIACOMINI: Barbara, as a
13 follow-up to that question, is there a way for
14 the Board and the industry to become aware of
15 the situations of old recommendations, of
16 whether they're rejected, shelved, ignored,
17 being processed? Is there a way to find out
18 what the -- and that goes forward, too.
19 That's not just the old ones in the past. Is
20 there a way for us to be able to find out what
21 the status of things are?

22 DR. ROBINSON: Well, my

1 understanding was that, actually, that Valerie
2 was working on, you know, trying to put
3 together a matrix. We've talked about this.
4 She's working on it and trying to track down
5 all of the historical Board recommendations,
6 and she had discussed about a way to, first of
7 all, try to organize them, get them in some
8 kind of way that we could cross-reference them
9 and not just do them chronologically because
10 that doesn't really help that much. That's
11 one way to organize them, but then that's not
12 always the most useful way, certainly not as
13 the Program matures.

14 And then to figure out the best
15 ways to organize them, for myself, what I
16 don't want to see happen is that the Board
17 starts repeating recommendations and piling up
18 old ground that's already been done. On the
19 other hand, the Board may find old
20 recommendations and say, "Okay, work has been
21 done on this. Certainly the Program may know
22 that work has been done this," but the Board

1 may say, "Hmm, we could take an old
2 recommendation and improve it. Now's the
3 time. Maybe the Program wasn't ready for it,
4 couldn't do anything about it, didn't have the
5 resources, and now the time is right," or,
6 "Maybe the problem has been solved," whatever,
7 I don't know.

8 So there's got to be a better way
9 to go back and do the seminal work and
10 organize these things in a way that, you know,
11 you can take a look at them. But Valerie has
12 started to do that and, you know, basically
13 cataloging them, cataloging them in a useful
14 way. They're not a secret, in other words.

15 CHAIRPERSON DELGADO: Joe?

16 MR. SMILLIE: Barbara, could you
17 elaborate on the 606 rule re-draft? As you
18 know, our Handling Committee, it's a
19 challenge. And I'm not sure, you just had a
20 short little thing about --

21 DR. ROBINSON: I know. I'm not
22 happy about this either. We should have had

1 this out. You've got something to say about
2 this, Rick, where we are with it? Is it stuck
3 in RGC or --

4 MR. SMILLIE: What's your current
5 thinking?

6 MR. MATTHEWS: Well, the comments
7 have all been reviewed, a doc has been
8 drafted. The doc has been drafted. It's
9 pretty long. All the comments have been
10 reviewed. I was not very happy with it. It's
11 about three-quarters rewritten. It's still
12 with the Program. It's on the plate as one of
13 the things to do. We did get nine rule-making
14 actions done, but that's one of them we
15 haven't gotten done.

16 DR. ROBINSON: But it was
17 published as an interim final.

18 MR. MATTHEWS: Yes. I mean, right
19 now, you've got a final rule out there. It's
20 an interim final and --

21 DR. ROBINSON: It's not that
22 you're inoperable but it's --

1 MR. MATTHEWS: And the only thing
2 that you're going to see happen is that either
3 the material is going to stay on, or it's
4 going to get pulled back up. That's what's
5 going to happen.

6 DR. ROBINSON: Oh, the suspense.

7 MR. SMILLIE: You know, reading
8 the tea leaves here, yes, we've got some
9 problems with the list, as you know. There's
10 things in wrong places, and we're trying to
11 attack it piecemeal, and we're finding
12 inconsistencies as we go forward on 606.
13 There's a lot of inconsistencies. There's
14 some materials that belong on 606 or some
15 place else. And as we muddle through our
16 Ag/Non-Ag resolution, which, hopefully, we're
17 going to bring to a close, it points to the
18 fact that, now that we know what we're doing
19 as a regulation, we need to go back and look
20 at 605 and 606, my two favorites, and just
21 say, okay, let's re-organize these and get it
22 right. Because it's just extremely difficult

1 to get it right now when there's the layering
2 inconsistencies with what we were given
3 originally. I won't mention any in
4 particular.

5 MR. MATTHEWS: Well, I could not
6 agree more that there are huge problems with
7 the National List in the way it's structured.
8 The 606, though, from an interim final rule to
9 a final rule, however, doesn't solve any of
10 those problems. So, I mean, it may have
11 sounded flip before, but the bottom line is
12 with the 606 rule either the material is going
13 to stay on or it will come off because of
14 comment. And, of course, those who want it
15 off want to see that thing out as soon as
16 possible. We want to see it out, too, but
17 we've got to get it right, and it will have to
18 work through the system. So if it's not right
19 leaving the branch, it's going to take a whole
20 lot longer to get it through the system.

21 But, no, Joe, you're right. The
22 National List has got huge problems with it,

1 and I can see no better project for this Board
2 to be working on than restructuring that
3 National List.

4 CHAIRPERSON DELGADO: Kevin?

5 MR. ENGELBERT: I would like to
6 defer until this subject -- if anybody has any
7 questions about this then I will wait --

8 DR. ROBINSON: He wants to defer
9 the subject until a later time.

10 MR. ENGELBERT: I want to defer my
11 comments until this subject is fully vetted.
12 If there are any other questions pertaining to
13 what we're talking about now I'd prefer they
14 go ahead.

15 CHAIRPERSON DELGADO: Any other
16 questions relating to the topic? No other
17 questions.

18 MR. ENGELBERT: No other
19 questions. Well, in deference to Hugh, I'll
20 be brief. But to keep things fair and
21 balanced, I wanted to post a comment about the
22 fact rule, also. Obviously, the community is

1 thrilled that it's out there, and the people
2 that I talk with and myself don't see any
3 really type of postponement or extended
4 comment period. It's obvious that the rule
5 that's written is very comprehensive; but, to
6 me, it simply clarified the existing rule.
7 And while it does need tweaking, I think the
8 organic community can come to a consensus in
9 that length of time. And the people that I
10 talk with, the farmers, would hate to see
11 anything to slow this process down and that
12 may end up postponing its implementation even
13 longer than we've already waited.

14 CHAIRPERSON DELGADO: Any other
15 comments or questions? Two people are buying
16 beers tonight. Yes, Bea?

17 MS. JAMES: I know on one of our
18 calls we talked about Richard leaving the
19 Program in January, and I wonder if there's
20 been any thought as to -- I know you're
21 irreplaceable -- who might step into that
22 position?

1 DR. ROBINSON: No.

2 MR. MATTHEWS: Anybody who wants
3 it.

4 (Laughter.)

5 CHAIRPERSON DELGADO: Any other
6 questions? I just have one more. I'd like to
7 say that nobody likes pop quizzes, and I do
8 like the concept that you're presenting about
9 having online year-round training, especially
10 for the producers. I know a lot of people
11 that want to do the right things but don't
12 have access to the right information, and I
13 think this is going to be a wonderful channel
14 to solve those problems.

15 My question, as always, is time
16 line, when do you think you'll be able to roll
17 this out?

18 DR. ROBINSON: Well, as you know,
19 and I'll only say it to you guys, I only have
20 one more year left. And, you know, this is,
21 you know, I always said my first priority was
22 getting out a pasture regulation, and this is

1 kind of my next pet project for the Program.
2 I believe in this very much. That's why I'm
3 willing to commit resources to it. I believe
4 that we really have to put this out to the
5 community. So, you know, I'm willing to give
6 up Thanksgiving and Christmas to work on the
7 OSP, to script it out. I really think this is
8 important.

9 I don't have a time line for you,
10 except to say that I would like to have the
11 whole thing done next year, all of it, the
12 whole regulation, all of the modules done.
13 Because it will be modules. It will be
14 separate modules. But, you know, first things
15 first, we'll roll it out as we get it done.
16 The labeling one would be done very quickly,
17 I would hope early spring. And then as soon
18 as we get one done, I'm hopeful that the rest
19 of them will come out quickly. It's always,
20 you know, getting the first one done is the
21 hardest. But, yes, next year, I would like to
22 get it all done.

1 CHAIRPERSON DELGADO: Any last
2 questions, comments, for Dr. Robinson? Well,
3 I would like to thank you very much, as well
4 as Richard, for all your work you've done.
5 We're going to miss you and wish you the best
6 of luck. Thanks again.

7 Moving on the next point, we have
8 Dan Giacomini talking about materials and the
9 review process.

10 MR. GIACOMINI: Thank you, Mr.
11 Chairman. I think, Barbara, the assistant
12 secretary you said was coming --

13 DR. ROBINSON: Deputy
14 Administrator.

15 MR. GIACOMINI: -- Administrator.
16 If they're on a tight schedule, you can just
17 interrupt me and I'll finish up after their
18 greeting, if that works.

19 DR. ROBINSON: He's not going to
20 come until, I think, after the break, Dan.

21 MR. GIACOMINI: Okay. If you've
22 seen this material presentation before, I'm

1 constantly trying to make it more complete and
2 more thorough and not dragging it out too
3 long. I did decide to change the background.
4 It didn't look good on that. It looks much
5 better on my computer. It's a sunrise or a
6 sunset, and it's not a statement on anything
7 organic of which one that is. It's just a
8 background. But it doesn't look good, so I'll
9 change it.

10 I'll be running through the
11 National List and what the sections are within
12 it; the petition items, where they stand at
13 this point in time; the material review
14 process; the criteria for both the National
15 List and the Sunset Review; a brief statement
16 on the Materials Working Group; and some final
17 notes.

18 Regarding the sections of the
19 National List, which are in the 600 section of
20 the rule, Section 205. 601 and 602 are crops,
21 with 601 being synthetics that are allowed;
22 602 non-synthetics that are prohibited.

1 Next slide. Livestock, 603 and
2 604 for livestock. 603 synthetics that are
3 allowed, and 604 non-synthetics that are
4 prohibited.

5 Handling. The National List
6 requires listing of both, so of everything
7 that is utilized and allowed. So on 605, non-
8 agricultural non-organic substances allowed as
9 ingredients in or processed products labeled
10 as organic or made with organic. Section A
11 being non-synthetics allowed, and B being
12 synthetics allowed.

13 606 is the non-organically-
14 produced agricultural products allowed as
15 ingredients in or on processed products
16 labeled as organic. Listed non-organically-
17 produced agricultural products may be used as
18 ingredients in or on processed products
19 labeled as organic only in accordance with any
20 restrictions specified in this section, and
21 only when the product is not commercially-
22 available in organic form.

1 The current status of National
2 List items that are in review at this meeting,
3 at the Fall '08, we are dealing with
4 recommendations for, in Section 601 for crops,
5 tetracycline hydrochloride, sorbitol
6 octanoate, pelargonic acid, and ammonium salts
7 of fatty acids. Section 603 for livestock--
8 there's currently no petition materials
9 reviewed at this meeting. 605 is calcium from
10 seaweed and an expanded use for ethylene. We
11 have two algae, which are listed as a 605 and
12 606 on this. And for 606, buck hull powder,
13 black pepper extract, and dried orange pulp.

14 Regarding some statements that
15 were made in public comment, there was a
16 couple of notes of an impression within the
17 industry that petitions to change the
18 annotation were not being accepted by the
19 Program. I would just like to note that we
20 have a couple of substances on the list for
21 this discussion at this meeting, as we have in
22 the past, of petitions that are essentially

1 annotation changes. So there were two
2 specific, I believe two specific questions or
3 examples of where petitions had been rejected
4 and where this idea was coming from. I will
5 work with Bob or whoever-- the Chairman of the
6 Materials Committee will work with Bob in the
7 next year before the next meeting to find the
8 status of those and try to resolve any
9 questions that are there.

10 Items that are up for
11 consideration that are on our list are listed
12 here. On the next slide, these are the ones
13 that the Board has received but we did not
14 have time for dealing with them at this
15 meeting. Some of them are on the list for
16 this meeting for discussion items. There was
17 a number of public comment presented on a few
18 of them, at least, but they are not up as
19 action items on this meeting.

20 In addition to those, we have a
21 few petitions that at one point in time we've
22 received and they've been sent back or pulled

1 back by the petitioner. If you go to the next
2 slide, please, Valerie, those are listed
3 there.

4 Next slide, please. Sunset items.
5 There are no Sunset items up for review
6 consideration at this meeting.

7 Next slide. The material review
8 process, the guidelines to either add or
9 delete substances to the National List with
10 the Federal Register notice as listed there.

11 Next slide, please. The material
12 review process, material petition process, is
13 designed for substantially one of three
14 things: adding new listings to National List;
15 changing annotations of existing listings
16 already on the National List; and removing
17 items currently on the National List.

18 Annotation change essentially comes down to a
19 situation of expanding use or restricting use,
20 and they're generally included in the writing
21 and when it's explained and described as
22 either being add or delete petitions. But

1 they all fit within that same framework.

2 Next slide. The National Review
3 process has a minimum time frame for the
4 National Review of 145 days, and this is
5 really an absolute minimum optimal time frame,
6 and it does not include time for rule-making.
7 It is conditional upon the completeness of the
8 petition on the initial submission, the
9 manpower within the specific reviewing
10 committees and the Board overall, time frame
11 relative to the NOSB public meetings, and
12 completion and review of technical reviews.

13 Day 1 through 14, and this day is
14 a starting day of when the Program initially
15 receives the petition. The petition is
16 received by the NOP and reviewed for
17 completeness. Issues determined not to be
18 complete-- the NOP contacts the petitioner for
19 completing the petition. Upon determination
20 of completeness by the NOP, the petition is
21 forwarded to the NOSB Materials Chairperson.

22 Next slide. Day 14 through 45, the

1 Materials Chairperson forwards the petition to
2 the chairperson of the designated NOSB
3 committee: crops, livestock, or handling. The
4 petition is re-evaluated for completeness and
5 determined if it will be forwarded for an
6 external technical review. And specific
7 questions which the committee wishes addressed
8 in the technical review are submitted to the
9 NOP.

10 Sixty days prior to the meeting at
11 the NOSB, the technical reviews are sent to
12 the NOSB. The TAP and the technical reviews
13 are posted on the NOP web site for review and
14 public comment, and the committee
15 recommendations are posted for public comment.
16 Prior to the meeting, the public comment is
17 accepted by the NOP and posted on the web
18 site.

19 At the NOSB meeting, the committee
20 recommendations are submitted. Further
21 comments are accepted from the public and all
22 public comment are taken into consideration,

1 and action is taken by the full NOSB Board
2 regarding committee recommendations. As a
3 final note, on the material review process,
4 all communications between petitioners and the
5 NOSB should go through the NOP.

6 Regarding the National List
7 criteria, there are two references there for
8 anyone who wants to look at it more detailed.
9 And the general National List criteria number
10 one: potential of such substance for
11 detrimental chemical interactions with other
12 materials used in organic farming systems; the
13 toxicity and mode of action of the substance
14 and its breakdown product of any contaminants
15 and their persistence in areas of
16 concentration in the environment; number
17 three, the probability of environmental
18 contamination during manufacture, use, misuse,
19 or disposal of each substance; the effect of
20 the substance on human health; number five,
21 the effect of the substance on biological and
22 chemical interactions in the agroecosystem,

1 including physiological effects of the
2 substance on soil microorganisms, crops, and
3 livestock; six, the alternatives to using the
4 substance in terms of practices and other
5 available materials; and, seven, its
6 compatibility with the system of sustainable
7 agriculture.

8 Regarding processing aids and
9 adjuvants criteria is, number one, the
10 substance cannot be produced from a natural
11 source and there is no organic substitute;
12 two, the substance manufacture, use, and
13 disposal do not have adverse effects on the
14 environment and are done in a manner
15 compatible with organic handling; three, the
16 nutritional quality of the food is maintained
17 when the substance is used and the substance
18 itself or its breakdown products do not have
19 an adverse effect on human health, as defined
20 by applicable federal regulations; four, the
21 substance's primary use is not as a
22 preservative or to create or improve flavors,

1 colors, textures, or nutritive value lost
2 during processing, except whether replacement
3 of nutrients is required by law; four, the
4 substance is listed as generally recognized as
5 safe by the FDA when used in accordance with
6 FDA's good management manufacturing practices
7 and contains no residues of heavy metals or
8 other contaminants in excess of tolerances set
9 by the FDA; and, six, the substance is
10 essential for the handling of organically-
11 produced agricultural products.

12 The criteria for 606, which are
13 agricultural and potentially commercially-
14 unavailable, the NOSB will consider: A) why
15 the substance should be permitted in the
16 production of handling an organic product; B)
17 the current industry information regarding
18 availability and history of the unavailability
19 of an organic form in the appropriate form,
20 quality, and quantity of the substance;
21 information that includes but is not limited
22 to regions of production, including factors

1 such as climate and the number of regions, the
2 number of suppliers and amounts produced;
3 number three, current and historical supplies
4 related to weather events, such as hurricanes,
5 floods, and droughts that temporarily halt
6 production or destroy crops or supplies; four,
7 trade-related issues such as evidence of
8 hoarding, war, trade barriers, or civil unrest
9 that may temporarily restrict supplies; and,
10 five, other issues that may present a
11 challenge to a consistent supply.

12 Sunset Review criteria. The
13 Sunset provision, no exception or prohibition
14 contained in the National List shall be valid
15 unless the National Organics Standard Board
16 has reviewed such exemption or prohibition as
17 provided in the section within five years of
18 such exemption or prohibition being adopted or
19 reviewed and the secretary has reviewed such
20 exemption and prohibition. So the Sunset
21 Review process needs to be done every five
22 years.

1 Sunset Review criteria. The
2 exemptions, which really is what the National
3 List listing is, were accepted because the
4 evidence available showed substances were
5 found not harmful to human health or the
6 environment; the substances were necessary
7 because of the unavailability of wholly non-
8 synthetic alternatives; and the substances
9 were consistent and compatible with organic
10 practices. The Sunset includes the
11 opportunity to revisit the continued need for
12 the exemption. If a review finds that the
13 initial conditions still exist, the regulation
14 is renewed for an additional period of time.

15 Sunset Review is to determine if
16 conditions relevant to the exception of the
17 exemption have changed. The Sunset Review
18 process is not to add new substances to the
19 National List. It is not to change an
20 existing annotation and is not the time to re-
21 interpret unchanged information and
22 conditions. These issues are best dealt with

1 in the petition process.

2 A note on the Materials Working
3 Group: the Materials Working Group is working
4 to help NOSB resolve issues, questions, and
5 confusion regarding the classification and
6 definition of materials. The members are from
7 across the industry and have been meeting in
8 conference calls on a regular basis. At the
9 Fall `08 meeting, we'll receive a follow-up
10 report on questions of Ag/Non-Ag as originally
11 addressed at the Spring `08 NOSB public
12 meeting. We will hopefully be looking at the
13 Spring `09 meeting a synthetic/non-synthetic
14 report. And hopefully, everything being
15 perfect, at the Fall `09 meeting we will allow
16 for the NOSB action on the MWG
17 recommendations.

18 Final note regarding public
19 comment: a reminder that all public comment is
20 handled now via the www.regulations.gov web
21 site. You search that according to the
22 appropriate Federal Register docket and the

1 government agency, which for us is the AMS.

2 As an effort to bring processing
3 of public comment to an equal level of
4 efficiency for all departments and agencies --
5 I need to change that. It's no longer a new
6 process, but it is a continually evolving
7 process, as we have all learned. And all
8 public comment received by the NOP is made
9 available to the NOSB members for review in
10 advance of the respective votes, whenever
11 possible.

12 And, finally, just to have them
13 posted so they are available, the web site
14 listings for the National Organic Program, the
15 NOSB web page, and the regulations.gov. And
16 that, Mr. Chairman, concludes the material
17 presentation, unless there are any questions.

18 CHAIRPERSON DELGADO: Are there
19 any questions for the Chair of the Materials
20 Committee? Mr. Chairman, I do have a question
21 on the list of materials that we have in the
22 pipeline. I count to 19; is that a correct

1 number? Pipeline for 2009.

2 MR. GIACOMINI: We just had three
3 more materials added to that pipeline on
4 Friday, and it's whatever is on that list. I
5 have the same number that you do.

6 CHAIRPERSON DELGADO: Okay, good.

7 MR. GIACOMINI: But that could
8 certainly change at any point in time. I
9 could -- by next Monday, Rob may have added
10 three or four more to the list, so--

11 CHAIRPERSON DELGADO: Okay. Thank
12 you for that. One more chance to ask
13 questions. All right. Thank you, Mr.
14 Chairman. And we'll move now to the next
15 point on the agenda, and that is a well-
16 deserved break, 10 minutes long. It's
17 actually 15, but we'll call it 10, so we'll be
18 here by a quarter to the hour.

19 (Whereupon, the foregoing matter
20 went off the record at 10:24 a.m. and went
21 back on the record at 10:49 a.m.)

22 CHAIRPERSON DELGADO: Okay. We

1 are back in session. And at this point, I
2 would like to ask Dr. Robinson to introduce
3 our special guest.

4 DR. ROBINSON: Thank you, Mr.
5 Chairman. As I mentioned before, our Deputy
6 Administrator, Dan Shipman.

7 MR. SHIPMAN: Thanks, Barbara, and
8 thank you Board members. I know it takes a
9 lot of your personal time to come and do
10 something like this. Over the years that I've
11 spent at USDA, I've been involved with a lot
12 of boards, and what I've heard about this
13 particular one, you really end up spending an
14 awful lot of time and energy, and it's a five-
15 year term. Most of them that I've dealt with
16 have been three-year terms max. So thank you
17 very much for the time that you provide. What
18 you do really helps run the Organic Program.

19 So I just thought I'd take a few
20 minutes, Barbara and her staff were gracious
21 enough to give me some notes, and I've thrown
22 those out and I'll use my own. But I wanted

1 to tell you a little bit about my background.
2 I grew up in Connecticut, so I'm not your
3 typical USDA guy that's from the Midwest. I
4 grew up in Connecticut, not on a farm, but I
5 did go to University of Connecticut and ended
6 up getting a degree in biology and natural
7 resources, so some of my roommates and so
8 forth at school considered me kind of a tree-
9 hugger.

10 But I've been in kind of
11 mainstream agriculture most of my career. I
12 started with USDA in '76, row crops primarily:
13 grains; sorghum, we talked a little bit about
14 sorghum; corn and soybeans and so forth; got
15 involved with a number of farm bills over the
16 years, and biotechnology as it entered the
17 market and some of the regulatory process
18 there. But as I learned more and more -- I
19 came to AMS just six months ago. When Ken
20 Clayton, Dr. Clayton retired, they asked me if
21 I'd put my hat in the ring, and I did and I
22 accepted the position.

1 And the group of people at USDA or
2 at AMS that I've had the pleasure to work with
3 have just been outstanding. I really think
4 that the staff there-- what makes a good
5 agency to serve the American agriculture and
6 the public at large is the staff that's built
7 there, and under Ken Clayton's leadership and
8 all of the administrators that have been there
9 and the deputies, like Barbara. I think
10 they've built a really fabulous staff, and
11 it's been a pleasure to work with them.

12 As I've worked with all of the
13 different programs at AMS, I don't find any
14 more interesting than the Organic Program. At
15 staff meetings on Monday morning, Barbara
16 always has something interesting to share.
17 Sometimes, it's good news; most of the time
18 it's challenges. But it's certainly an
19 interesting program, and I really do enjoy
20 listening and starting to get involved in it.

21 I just want to share a little bit
22 of kind of the principles that guide me and

1 will guide me as I work with Barbara regarding
2 the organics or any standards. First of all,
3 I believe that when you establish standards--
4 government standards-- you have to do it in a
5 transparent, open process, and I will support
6 that; and they have to be clear standards and
7 rules that you operate by. Ambiguity within
8 the marketplace creates risk and uncertainty,
9 and that doesn't benefit anybody in a
10 marketing system. So setting clear standards
11 in a transparent way is certainly of interest
12 to me, and you will have my support as you
13 move forward in that.

14 And then educating people and
15 reaching out and making sure they understand
16 those standards and rules is vitally
17 important. Again, whether you're talking
18 about organic standards or you're talking
19 about ethanol standards or any other standard
20 that the government may get involved with,
21 people have to understand what those rules
22 are.

1 And then when you come to
2 enforcement, my philosophy is that you have to
3 hold people responsible for those standards,
4 but you have to use all of your enforcement
5 tools that are in your toolbox. It's just not
6 a one-fit solution. And you have to develop
7 an environment where people that are in that
8 market, in that industry, want to adhere to
9 those standards, that it's in their best
10 interest to adhere to those standards.

11 So set the standards by listening
12 to folks, trying to build a consensus, make
13 sure they're clear, and do it in a transparent
14 way. Educate, outreach to people so that they
15 know what those standards are. And then
16 enforce those standards, and do it in a way
17 where you use all the tools and authorities
18 that are at your access.

19 So I'm just going to end it there.
20 If anyone has any questions, I'd be more than
21 happy to try to answer them. I know you have
22 a very busy schedule. I see Lenny back there.

1 I've run across his path a few times in my
2 days over in the corn and soybeans and so
3 forth. Good to see you, Len. Any questions?
4 If not, I again welcome you, and we can get on
5 with your meeting.

6 CHAIRPERSON DELGADO: Thank you.

7 MR. SHIPMAN: Okay. Thanks.

8 CHAIRPERSON DELGADO: I'm going to
9 ask the Board members to see if they have any
10 questions. Thank you very much for taking
11 time away from your busy schedule, and I
12 appreciate you coming.

13 MR. SHIPMAN: I forgot, almost.
14 The listening sessions on pasture- two more--
15 Barbara asked me to mention that. And I guess
16 you mentioned you wanted to say something
17 about transition team and what can be
18 expected. One quick comment: at 3:00 today we
19 meet for the first time with the transition
20 team that's coming into USDA. We'll see how
21 that goes. We're going to be providing
22 information as far as what we do, what some of

1 the big challenges are for the first 90 days
2 of the new administration coming in. This is
3 the first session that we will have with them
4 in the marketing and regulatory area, but they
5 are here. They've already hit the ground and
6 they're starting to meet with folks. So you
7 can start to anticipate getting some feedback
8 as to what's occurring over the next few
9 months. Thanks, and enjoy your meeting.

10 CHAIRPERSON DELGADO: Thank you.

11 MS. FRANCES: The restaurant in
12 the hotel, if you would like to eat there for
13 lunch, they have pre-ordering. If you would
14 like to order off that menu you need to
15 basically do that now.

16 CHAIRPERSON DELGADO: Thank you.

17 Any other comments? Moving on with the
18 agenda, we're going to start our public
19 comment session. And before we do that, let
20 me do the traditional thing that we do at the
21 start of public comment, which is essentially
22 reading the ground rules. If you're

1 interested, we have those on page 29 of the
2 procedures manual for our Board.

3 There are several points. I'll
4 skip to the most important one, which is
5 individuals providing public comment will
6 refrain from any personal attacks or remarks
7 that otherwise fall on the character of the
8 individual. And we're very strict with that.
9 Folks, what we're looking for is constructive
10 ideas that will help us improve the quality of
11 our recommendations. Also, I want to touch
12 upon the mission of our Board, which is to
13 provide effective and constructive advice.

14 So, as you realize, we have a
15 number of people presenting today. I think
16 the list is over 60 today. We want to listen
17 to all of you. We encourage you to stick to
18 the five-minute limit that we invoke per
19 individual. We are not trying to turn anybody
20 away, by all means; we're interested in your
21 comments and your ideas. But we would like to
22 ask that you are specific-- concrete in giving

1 us your input and your ideas on what is it
2 that we can do to make our work better.

3 So, on that note, our first
4 speaker of the day is Dave Martinelli, and he
5 is representing the Methionine Task Force.
6 And, again, for the ground rules, our acting
7 secretary will give the speaker a one-minute
8 notice, and that will be the indication that
9 you have one minute left for wrapping up
10 comments.

11 After Mr. Martinelli, we have Dave
12 Bruce, if you can be ready to move on to the
13 podium.

14 MR. MARTINELLI: Actually, David
15 Bruce, I've got a proxy from David Bruce.
16 And, actually, David Will is presenting from
17 the Methionine Task Force, too, so we're going
18 to try to use 10 to 15 minutes between the two
19 of us.

20 CHAIRPERSON DELGADO: So you have
21 a proxy --

22 MR. MARTINELLI: My five minutes,

1 one proxy, and David's five.

2 CHAIRPERSON DELGADO: All right.

3 MS. FRANCES: It's on the list, so
4 it's all there.

5 MR. MARTINELLI: And for the
6 record, I'm Dave Martinelli with Coleman
7 Natural Foods, and I'm here with David Will,
8 and we're presenting for Methionine Task
9 Force. I'll let him do his own introduction
10 when it's his time.

11 Basically, methionine is not an
12 agenda item for the NOSB at this time, but at
13 the last NOSB meeting we had committed to you
14 all that we were going to be actively engaged
15 on kind of a 24-month work plan involving
16 research on alternatives, as well as
17 conducting some more field trials. So today
18 is just the first in a series of updates that
19 you'll get from us on what we're actively
20 engaged on.

21 And just to kind of get everybody
22 up to speed, just a quick primer here,

1 methionine is a necessary nutrient in poultry
2 production. The NOSB has approved the use of
3 synthetic methionine until October 2010, and
4 the Task Force is currently involved in a
5 number of projects looking at alternatives and
6 seeing if we can raise chickens without
7 synthetic methionine.

8 There was a specific question that
9 came up between the last Board meeting and
10 this meeting from you all regarding, how much
11 synthetic methionine do we add to the diet?
12 The question was asked in the open session at
13 the last meeting, but there wasn't a whole lot
14 of science behind our answer. So we went out
15 and worked with Dr. Robert Schwartz, who's a
16 member of the Task Force. He's a long-time
17 poultry nutritionist. He has his own company
18 and consults for companies on the East and
19 West Coast. And we also brought in specific
20 nutritionists that work with some of the Task
21 Force members: Dr. Paul Twining who works in
22 California and Pennsylvania, and Dr. Richard

1 Arnold in Texas.

2 So just kind of to do a quick
3 overview of methionine, it is required to
4 meet, we add synthetic methionine to the diet
5 to meet both the methionine and cystine
6 requirements of the birds. Both methionine
7 and cystine are sulfur-containing amino acids,
8 and birds have a high demand for cystine as
9 part of the feathering process that they go
10 through. And we do not add cystine in
11 synthetic form, but the birds are able to take
12 in the methionine that we provide them and
13 metabolically convert it into cystine. So the
14 reason that that's important is when you look
15 at the methionine needs for the birds, you
16 really need to look at both the methionine and
17 the cystine needs.

18 This chart indicates, we went
19 through different classes of poultry: layers,
20 broilers, turkey, duck, and geese. And this
21 is just kind of a general percentage. They're
22 very specific numbers, but we tried to take

1 specific age groups of the birds. I mean,
2 these percentages change throughout the life
3 cycle of the animals, obviously, so we tried
4 to take a snapshot in time for each of the
5 different species to show you what the birds'
6 total demand is and then how much is being
7 provided from the grains and how much
8 synthetic is being added.

9 I think the real take-away here is
10 that, at most, we're adding one-quarter of one
11 percent synthetic methionine to the diet, so
12 it's an exceedingly small amount. It's, at
13 most, about five pounds per ton of feed, so
14 it's a very small percentage of the overall
15 feed.

16 We also try to break it out not
17 only as percentage of the diet, but I think
18 the real question was, if a bird has a demand
19 for methionine/cystine, how much of that
20 demand is met from the organic grains in the
21 diet and how much is met from the synthetics?
22 And, again, this is a gross generalization,

1 but approximately 70 percent or more of the
2 birds' dietary needs are met from their base
3 diet, from the grains in the diet; and we're
4 adding the synthetic to meet approximately 30
5 percent or less of their total methionine and
6 cystine needs.

7 So now to kind of segue way into
8 the active research that we're doing, as you
9 recall, our most promising area of research is
10 around high methionine corn, and you all had
11 a presentation from Dr. Walter Goldstein at
12 the last meeting. I actually have copies of
13 his latest communication to us where he goes
14 into much more detail about all the work that
15 he's been doing on trials. I just summarized
16 it here. We completed seed stock trials in
17 Hawaii this spring. I think that might have
18 even been done at the last meeting. And then
19 plantings occurred in the Midwest in the
20 spring, and they're just harvesting the crop
21 now in Wisconsin, Iowa; and we actually have
22 some East Coast plantings in Pennsylvania that

1 one of our Task Force members is doing, as
2 well.

3 We, unfortunately, just because of
4 timing, don't have any data on yields or
5 thiamine levels or protein levels in the corn.
6 We're just literally collecting that data now,
7 so probably in 30 to 60 days we'll be able to
8 have a report on that. And then we'll be able
9 to assess how much grain is available for
10 feeding trials and then how much has to be re-
11 used for seed stock.

12 We are working with Dr.
13 Goldstein's group, the Michael Fields
14 Agricultural Institute, on trying to do a
15 winter planting, you know, either in the
16 southern hemisphere-- Chile is what we did
17 last year-- or in the States, either Florida
18 or Hawaii. We're trying to get two planting
19 cycles a year to try to accelerate the
20 development the hybrids.

21 The other area we've made good
22 progress I think is we funded a grant through

1 the University of Arkansas with Dr. Steve
2 Ricke, who's the Director of the Center of
3 Food Safety. He is working on trying to
4 isolate bacteria that will naturally produce
5 methionine, and he's modeled a three-phase
6 trial that will take about 12 months to
7 complete. End of January he will start phase
8 one, and the Task Force has agreed to
9 underwrite that program. He would really be
10 the best person to give you the updates on
11 that trial. I think it's premature to get him
12 here now, but maybe at next spring's meeting
13 or next fall's meeting he can come in and give
14 you a full presentation on what they've
15 determined at that point, at least in the
16 trial work that he's doing.

17 The third thing that we were
18 committed to looking at was this notion of
19 insect meal or ento-protein. There was a
20 presentation a couple of meetings ago by
21 Neptune Industries at the agriculture session.
22 I would characterize this as really not a

1 viable alternative, currently. We've had some
2 discussions with the folks at Neptune. They
3 are at the very beginning level of pilot
4 programs. I mean, they're talking about
5 having maybe 20 pounds per week of this
6 product available sometime in the next three
7 to six months. So it's really not even on--
8 at that volume, it's really not even a trial-
9 able scale because this is not 100-percent
10 methionine; it's another feed source that has
11 an elevated level of methionine, probably
12 similar to fish meal. We've not been able to
13 get any specific specs from the company yet.
14 As soon as we can get some specs, and as soon
15 as they get to more commercially-viable
16 volumes, then we can take another look at it.

17 With that, I'm going to turn it
18 over here to David Will to talk about some of
19 the work they've been doing in the field with
20 birds on diets without methionine.

21 MR. WILL: Good morning. Thank
22 you. My name is David Will. I'm with Chino

1 Valley Ranchers/MCM Poultry, and we are
2 actually conducting with the Methionine Task
3 Force the first commercial-scale layer trial
4 down in Lakeview, California. We're currently
5 at 27 weeks of age on the birds. They were
6 hatched the second week of May of this year.
7 They are sisters: a total of 22,000 birds
8 divided into two houses, 11,000 each. One
9 flock is being raised under our normal
10 practices. The second, we are adding no
11 additional methionine to the ration. They are
12 high-lying brown pullets and now our egg
13 layers. They are cage-free, and our intent
14 and commitment of our company is to run this
15 through the full cycle of their life, which
16 includes to the age of 105 weeks of age.

17 In our control group, we currently
18 have fed them a total of 10,383 total grams of
19 feed, of which 1,885 was protein, 52.52 grams
20 of that were methionine which included 22.52
21 grams of added methionine. And for their
22 four-week average, they've consumed a little

1 over 24 pounds of feed. And to date, we've
2 received an average of 9.9 eggs per hen.

3 The major differences on the birds
4 that we've added no methionine: they've
5 consumed 10,292 total grams of feed, 2,211
6 grams of protein, or about 17 percent more in
7 order to compensate for the methionine.
8 They've received 37.8 total grams of
9 methionine or about 30 percent less to date,
10 zero percent added synthetic methionine.
11 Their four-week average of feed consumption is
12 over 28 pounds, and we've received a total of
13 8.8 eggs per hen to date.

14 Both flocks started at 11,000
15 birds. The control group has a mortality so
16 far of 538 total layers. The no methionine is
17 at 678. And except for the first week, the
18 mortality has been very, very similar and
19 close. It was the first week the methionine
20 group had a slightly higher loss, which we
21 attribute to just poor hatchlings.

22 The control group has a uniformity

1 of 1,741 grams or 85 percent of body weight to
2 our target plan. The no methionine group is
3 at 1,707 grams and is at 70 percent
4 uniformity, meaning out of 100 birds 70
5 percent are at target of the weight and 30
6 percent are not within. At the end of the
7 brood, both flocks were within I believe 17
8 grams of each other, and in the last couple of
9 weeks the no methionine-added group has
10 started to really dive.

11 The control group-- we're
12 currently at 75.3 percent production with an
13 average egg weight of 57.8 grams, which is
14 just slightly above a large; and our case
15 weight is about 46 pounds. To date, the no
16 methionine group this last week was at 65.6
17 percent production, and the average egg weight
18 was 56 grams, and the case weight was about a
19 pound lighter at 45.

20 Some general observations. The
21 feathering in both houses looks great, and we
22 have a lot of feathers on the ground, which is

1 one of the first warning signs. We anticipate
2 to see that changing. We've had no added
3 signs of cannibalism whatsoever. And in the
4 no-added-methionine group, feed consumption is
5 about 20 percent higher, egg production is 15
6 percent lower, and case weights are 3 percent
7 lower as well.

8 Our last general observation, we
9 are starting to become concerned about
10 ammonia. Because we're in Southern California
11 and we've had a very mild fall so far, we've
12 been using natural ventilation with no
13 concern. As we start getting colder now,
14 we're going to be buttoning up the houses a
15 little bit to control the birds' heating, and
16 we anticipate ammonia problems due to the
17 extra protein in the feed and in their urine
18 and bodily function output. So we will be
19 monitoring that. To date, we've done none
20 because we haven't seen any.

21 And our other major concern is
22 that the age of the birds, that we are just

1 starting to get into peak production and major
2 case weight, and we've been warned by our
3 veterinarian and our nutritionist that the
4 feed consumption is one of the first signs
5 that we're going to start having some issues
6 coming up in the near future.

7 CHAIRPERSON DELGADO: Are there
8 any questions? Kevin?

9 MR. ENGELBERT: Could you
10 elaborate a little bit on your hatching and
11 why you felt there was a difference in the
12 mortality between them? And were the parent
13 birds being fed methionine? And could you
14 also elaborate on your cage-free system? Do
15 the birds have access to the outdoors, or are
16 they simply in a barn with an open area to
17 roam?

18 MR. WILL: First, it's just a
19 random luck of the draw. You get great
20 hatchlings and you get less-than-standard
21 hatchlings from the hatchery. We don't hatch
22 our own birds. They came from one of the

1 traditional hatcheries in Southern California.
2 I'm sure the parent stock was a standard
3 methionine-fed flock.

4 As far as the system, it is a
5 cage-free house. These birds are not on an
6 organic ration. We weren't willing to commit
7 that sort of money because we weren't sure how
8 much these birds were going to crash as the
9 program goes on. So they are on an open-
10 house, no restrictions with movement, open
11 sides, with ventilation and access to the
12 ground.

13 CHAIRPERSON DELGADO: Hugh?

14 MR. KARREMAN: Thank you for that
15 update, you guys. We really appreciate that,
16 and you know we're watching you, and it's
17 really good to see that you're following
18 through. That's really important. Just
19 wondering on the study you did -- you had the
20 data there, which is great -- are they
21 significant differences? I mean, that's your
22 raw differences. Are they significant, you

1 know --

2 MR. WILL: Individually, no.
3 Cumulatively, they're starting to become a bit
4 of a difference, yes.

5 MR. KARREMAN: And you'll censor
6 the data from the hatchlings that didn't make
7 it into your final numbers?

8 MR. WILL: Probably not, because
9 that's just part of the, you know, the
10 randomness of poultry. So I don't think we'll
11 take that into account. It would be more from
12 the moment of housing, which they both
13 basically went in. To date, their livability
14 has been excellent in both houses, so I think
15 we'll only look at that as the number. We
16 just wanted to make that an awareness at the
17 start that there was that minor issue.

18 But, mainly, we'll be looking at
19 consumption, conversion, and health. Number
20 one will be health of the birds driving us.

21 MR. KARREMAN: As you're going
22 into the more critical time, according to your

1 nutritionist and vet, can you still add in
2 methionine as needed for the welfare of the
3 birds? Or is it like, "Oops, too late,
4 they're done?"

5 MR. WILL: If we had to pull in,
6 we could add methionine. We've actually had
7 some experiences where we've seen some
8 production in the Midwest that we didn't know
9 or didn't have any control over where that was
10 the problem, they were methionine deficient,
11 and the birds had really majorly crashed. Our
12 nutritionist stepped in, and we actually were
13 able to salvage that production and keep those
14 birds in excellent shape.

15 So we are watching it. Our intent
16 is to go as far as we can, and our hope is
17 that we get to the end of this and have 105
18 weeks of data to present to you. But again,
19 bird health has to be our number one issue.

20 MR. KARREMAN: Thanks.

21 CHAIRPERSON DELGADO: Dan?

22 MR. GIACOMINI: A couple of

1 questions. Will it be okay for Valerie to send
2 copies of these out to us? I'd like to do
3 some crunching on some numbers on those, if
4 possible.

5 MS. FRANCES: They'll be posted on
6 the web site.

7 MR. GIACOMINI: Okay, fantastic.
8 Dave, you referred to your requirement as a
9 methionine/cystine requirement. Is that the
10 way the industry wants us to look at what
11 we've been looking at as a methionine number?
12 I know sometimes we talk about methionine and
13 sometimes it's methionine/cystine. Is that
14 the preferred way the industry wants to look
15 at it?

16 MR. MARTINELLI: That's the
17 feedback we got from all the nutritionists.
18 They all basically said you need to look at
19 them together. So I would say, you know,
20 we've not done in that past and shame on us.
21 But I think, going forward, we should try to
22 look at it as a total.

1 MR. GIACOMINI: Okay, all right.
 2 And, finally, Dave, in your trial, the box is
 3 only so big when you have that kind of an
 4 increase in protein. What was your drop in
 5 energy? Or did you have a drop in energy, or
 6 was it absorbed somewhere else in this trial?

7 MR. WILL: So far we haven't seen
 8 a drop.

9 MR. GIACOMINI: No, but in the
 10 energy density of the diet, when you see that
 11 kind of an -- you had to take that space that
 12 you took up with more protein from something.
 13 Was it energy, or was it something else?

14 MR. WILL: I'll have to get back
 15 to you on that specifically.

16 MR. GIACOMINI: Okay.

17 CHAIRPERSON DELGADO: Kevin?

18 MR. ENGELBERT: Mr. Will, did I
 19 understand you correctly to say that the feed
 20 ration is off, it's conventionally fed ration
 21 to both groups of birds?

22 MR. WILL: Correct. Both groups

1 are conventional feed.

2 MR. ENGELBERT: To get a trial for
3 organically-fed birds, wouldn't you want to
4 try to have organic feed, given that the
5 nutritional content and availability, at least
6 from my own experience, for organic feed is
7 significantly higher than conventional feed.
8 Seriously, it would have a real impact on the
9 outcome.

10 MR. WILL: I'm not sure that
11 that's something that we looked at further
12 down with the difference in the organic versus
13 the non-organic, because we balance our
14 rations to a set level of proteins. So I
15 think, if anything, it would be a little bit
16 of adjustment within the ration. But our main
17 concern was, this never having been done
18 before, growing birds from start at this level
19 of scale, we had no idea what we were walking
20 into. And as a financial commitment of the
21 company, we felt that this was one that we
22 were comfortable with to start with.

1 MR. ENGELBERT: I would certainly
2 be interested in even a smaller scale trial
3 where organic feed was the basis for the
4 ration and see what the differences were then.

5 MR. MARTINELLI: You know, I could
6 add for the broiler trials that we've done
7 we've used organic feed, because it's a much
8 smaller quantity of birds and a much shorter
9 feeding cycle. I mean, I can totally
10 appreciate what Dave is going through at 105
11 weeks. The math gets much different. But I
12 think the thing would be let's see how these
13 birds do over the next critical phase, and if
14 the results are promising then I think the
15 next thing to follow it up with would be maybe
16 an organic-based trial with smaller numbers or
17 something.

18 CHAIRPERSON DELGADO: Kevin?

19 MR. ENGELBERT: And thank you for
20 your efforts and report.

21 CHAIRPERSON DELGADO: Bea?

22 MS. JAMES: I'm trying to

1 understand, do your birds see sunlight at all?
2 Do they go outside?

3 MR. WILL: No. Our cage-free
4 birds do not go outside. However, they live
5 in houses that are, none of the walls are
6 solid. So they're ventilated by nature, and
7 they interact, insects fly in, and receive the
8 morning sun and the afternoon sun into the
9 house.

10 MS. JAMES: Do you know of any
11 research as far as what the nutritional needs
12 are of birds that are actually outside versus
13 the way you raise them?

14 MR. WILL: There have been several
15 studies done with that, and as far as I've
16 seen, I haven't seen major changes in any of
17 those. As far as the amount of feed that they
18 graze from the land, I haven't seen major
19 differences.

20 CHAIRPERSON DELGADO: Any other
21 questions? Okay. Well, thank you very much.
22 And moving on, we have Leslie Zuck. And after

1 Leslie, we have Miles McEvoy.

2 MS. ZUCK: In the interest of your
3 long list, I'm going to relinquish my time.

4 CHAIRPERSON DELGADO: Thank you,
5 Leslie. That being the case, we have Miles
6 McEvoy, followed by John Foster.

7 MR. MCEVOY: I'm Miles McEvoy at
8 the Washington State Department of
9 Agriculture, and I'm also speaking on behalf
10 of the National Association of State Organic
11 Programs. I'm the President of the National
12 Association of State Organic Programs, and we
13 have comments on grower groups and commercial
14 availability of organic seeds.

15 NASOP is a group of state organic
16 programs and state certifiers. We have an
17 annual meeting and training get-together to
18 discuss issues that are important to state
19 departments of agriculture in terms of
20 supporting the organic industry through
21 marketing, through clear standards, and
22 through certification and enforcement.

1 The one thing that's really
2 important to the state organic programs and to
3 NASOP is protecting organic integrity, and I
4 think that's one of the areas that really
5 needs to be focused on in the National Organic
6 Program. And there's a few different items
7 around protecting organic integrity that I
8 think should be strengthened and looked at,
9 and one is enforcement. I think enforcement
10 needs to be strong and rigorous. There is a
11 lot of mislabeled products out there. There's
12 fraud out there in the organic community. And
13 that when we find fraud, civil penalties
14 should be assessed. Civil penalties can be a
15 real deterrent to fraud, and I think that that
16 part of the National Organic Program should
17 really be used to help to prevent further
18 fraud.

19 Surveillance needs to occur,
20 including random sampling. States can help
21 with doing surveillance inspections.
22 Surveillance is a way to identify problems

1 that occur when you least expect it, and those
2 unannounced inspections are really different
3 than when you do an announced inspection and
4 people know that you're coming. Unannounced
5 inspections, surveillance inspections, those
6 check-up inspections, those sampling, that's
7 really important to do.

8 The other thing I think that we've
9 heard is that there's a lack of consistency in
10 terms of how the National Organic Program is
11 implemented by different certifiers, different
12 interpretations. And so I think it's really
13 important that we have continued training from
14 the National Organic Program. We need to hold
15 certifiers accountable through the
16 accreditation process, so bumping up the
17 scheduling of the auditing process I think is
18 really important. But I would also suggest
19 that certifiers also could use some technical
20 assistance, some direct meetings with National
21 Organic Program staff in a non-auditory type
22 of situation so that it's a little more of a

1 friendly atmosphere.

2 The work on the web-based training
3 is going to be very important, and that's
4 going to really help out in terms of getting
5 consistent information out to certifiers, and
6 I think that will help a lot. But there's
7 other things that need to happen, as well.

8 So in terms of grower groups,
9 NASOP does not support the current writing of
10 the grower group. We support the concept of
11 the multi-site certification of the grower
12 group component, but we think there's some
13 concerns with the way that the current
14 proposal is written. And one would be to
15 limit the multi-site certification to
16 producers, limit it to small holders that are
17 under \$5,000 in organic sales, and make sure
18 that what is certified through the multi-site
19 process is a legal entity. We support the
20 minority opinion that new growers should be
21 inspected before they're joined into the
22 multi-site certification prior to their

1 acceptance within the certification program.

2 And then one thing to keep in mind
3 is that the organic system plans and the
4 internal control system, those procedures are
5 great and they help build integrity. But
6 inspection is really critical. Violations in
7 the states are found in unlikely places. When
8 you do those surveillance inspections, when
9 you're doing those inspections, you're finding
10 things that actually help the operation. And
11 we can't just rely on internal control systems
12 and organic system plans to document and to
13 ensure organic integrity.

14 So that's it for NASOP. Should I
15 go on with the WSDA comments at this point?
16 We also have comments for WSDA, Washington
17 State Department of Agriculture.

18 MS. FRANCES: The NASOP comments
19 were down later in the day for a five-minute
20 spot, and the WSDA comments were now.

21 CHAIRPERSON DELGADO: Let's
22 proceed.

1 MR. MCEVOY: Okay, great. Five
2 minutes for commercial availability of seeds.
3 So this is a very important issue. The draft
4 that has come out is much better than previous
5 drafts, but there's still some problems with
6 it from our perspective.

7 A couple of the problems are some
8 of the assumptions that are made in the draft.
9 One is that the organic seed industry is not
10 growing, and I don't think there's adequate
11 data to show that. I think that, from our
12 experience in Washington State, that the
13 organic seed industry is growing. There's a
14 lot more organic seeds that are being used by
15 growers of all sizes. Small, medium, and
16 large-scale growers are using more and more
17 organic seeds.

18 The other thing that's said in the
19 draft is that organic growers are unwilling to
20 use organic seeds. That's certainly not our
21 experience. Organic growers are going to a
22 lot of ends to try to find organic seeds to

1 use, to purchase organic seeds; and they don't
2 use cost as a factor to not use organic seeds.
3 We're not seeing that as a real impediment for
4 organic growers to use organic seeds.

5 Certifiers that we know are not
6 using cost as a factor to determine commercial
7 availability. They're using the other aspects
8 of the commercial availability and quality of
9 the seeds.

10 So the proposal, we see it as
11 being quite burdensome, especially for
12 diversified growers. We certify about 800
13 growers in the state of Washington, and many
14 of those are very diversified. Some of them
15 are small acreage farms, and some of them are
16 larger acreage farms that have hundreds of
17 varieties. And this proposal would be very
18 burdensome on them. When they're planting
19 many different plantings on small acreage, it
20 would be very difficult to meet the new
21 regulatory requirements.

22 And then the other part of the

1 proposal is that there's an implied part of
2 the proposal that says that certifiers allow
3 the use of organic seeds. What happens is in
4 our process is that the organic grower has a
5 procedure in place to verify that they're
6 using organic seeds and they're only using
7 non-organic seeds when they're not
8 commercially-available. And they have
9 documentation to verify that those non-organic
10 seeds are not available.

11 The proposal implies that
12 certifiers are looking at each and every seed
13 choice and approving or allowing the use of a
14 non-organic seed. That's just not feasible.
15 When growers are using hundreds of seeds and
16 making lots of different choices on a very
17 short time frame, it's not possible.

18 So what we do is we review that
19 plan, we inspect that plan, and we audit that
20 plan to ensure that they're only using non-
21 organic seeds when organic seeds are not
22 available. And that system works, and it has

1 worked to increase the number of organic seeds
2 that are being used by organic growers.

3 The other part of the proposal is
4 to report on the percent of organic seeds
5 used. Again, that's going to be very
6 problematical for diversified row crop
7 operations because of the number of seeds that
8 they're using and the small acreages that
9 they're planting on. And it's also not going
10 to lead to any additional use of organic
11 seeds.

12 Now, there are some problems with
13 organic seeds being used by larger-scale
14 processors in particular, growers that are
15 getting seeds from the processing industry.
16 There we're seeing not very many organic seeds
17 are being used. So that would be a more
18 targeted way of looking at this development of
19 the organic seed industry. Identify those
20 areas where the organic seed industry is not
21 working or not developing and put our focus
22 and our attention there.

1 And that might be an area, because
2 it's larger acreage, it's usually a single
3 planting on a larger acreage, we could report
4 back, certifiers could report back on the
5 acreage of the specific varieties that are in
6 non-organic form, and that would give the
7 information to the seed companies of, okay,
8 here you have so much acreage of certain types
9 of varieties that are non-organic, and then
10 they could develop the organic seeds that then
11 could be used.

12 So the only other thing I wanted
13 to do was that the Puget Consumers
14 Cooperative, 45,000 members in the Seattle
15 area, they have some comments that they tried
16 to submit on aquaculture standards, and so I'd
17 like to submit those into the record. And
18 that's it.

19 CHAIRPERSON DELGADO: Thank you.
20 Kevin?

21 MR. ENGELBERT: Thank you, Miles.
22 Could you elaborate a little bit when say that

1 your seed growers are trying to come up with
2 seed in a short order of time? That hasn't
3 been my experience with people that I talk to
4 that that's generally the case and that's
5 where we were coming from. We try to order
6 our seed in the fall. We plan our rotations
7 one, two, sometimes three years in advance.
8 What is there about our proposal that you
9 think couldn't be met in that regard?

10 MR. MCEVOY: Well, when a grower
11 loses a planting, they want to plant something
12 else to meet a market demand, when they see
13 that there's something that's selling well.
14 They make those kinds of choices on a pretty
15 short time frame. So, yes, they'll have a
16 general plan in terms of the kinds of seeds
17 that they're planning on using during the
18 upcoming growing season. But then as the
19 market developments, as they have particular
20 successes or failures with certain crops, then
21 they are getting additional seeds to meet
22 those changing conditions.

1 CHAIRPERSON DELGADO: Jerry?

2 MR. DAVIS: Miles, can you clear
3 up in my thinking what you mean by this
4 specific area that you thought with
5 processors? What is that world you're
6 speaking of? I'm not sure I understand what
7 you mean.

8 MR. MCEVOY: Growers that are
9 growing organic corn, peas, potatoes for
10 processed organic vegetables, so for frozen
11 vegetables in particular. So what is
12 happening with the processor is providing the
13 seed to the grower, so the processor is the
14 one that has to get the commercial
15 availability or unavailability documentation.
16 The grower is not making the choice in terms
17 of the type of seed that they're planting.
18 The processor dictates what type of seed is
19 being planted because of their harvest
20 schedule.

21 MR. DAVIS: So when you say that
22 that's an area that you're describing, the

1 wording we used for the document was the
2 buyer of the organic product, which in this
3 case would be the processor calls the shots on
4 the seed and not the grower. Then it puts
5 them in the loop to say this is what we accept
6 from that entity, from the processor.

7 MR. MCEVOY: Yes, I think that's
8 very important for certifiers to do that, to
9 put that buyer of the product that's providing
10 the seeds, they're the ones that need to find
11 organic seeds or use their resources to try to
12 develop organic seeds.

13 MR. DAVIS: And the grower
14 component that you certify in Washington,
15 you're saying the biggest problem you see is
16 with that area versus the general grower?

17 MR. MCEVOY: Yes, on the smaller
18 diversified farms, we're seeing lots of use of
19 organic seeds, more and more every year. I
20 don't have any specific figures for that; it
21 would take a lot of resources --

22 MR. DAVIS: What if I told you the

1 larger --

2 MR. MCEVOY: The larger-scale, no,
3 we're not seeing hardly any use of organic
4 seed. And the excuse or the reason that's
5 given is that they need to have specific
6 varieties because of their harvest schedule
7 because the processor is doing both organic
8 and conventional production, and so they have
9 a certain schedule of harvesting of all these
10 different fields, and so they dictate exactly
11 what variety they're going to plant in a
12 planting day for that harvest schedule. And
13 they use that as one of the reasons why
14 organic seeds are not available.

15 MR. DAVIS: In the typical
16 Washington state systems that you see, it's
17 either smaller to medium-sized growers that
18 are not sending to processors and tied into
19 that scenario.

20 MR. MCEVOY: Right.

21 MR. DAVIS: And then there's the
22 larger growers that all seem to be in that

1 group? There's not larger diversified growers
2 that market themselves?

3 MR. MCEVOY: Yes, they're usually
4 different types of farming operations. You
5 usually have larger scale that are going to
6 wholesale or in the processing industry and
7 then the smaller scale are doing more of the
8 direct bargaining, which some of those direct
9 bargaining operations can be quite large with
10 hundreds of growers and CSAs and many markets
11 that are covered.

12 MR. DAVIS: The Board would appear
13 to be singling out the large processor type
14 entities by saying we're going to focus on you
15 and not apply the same regulations to everyone
16 across the Board?

17 MR. MCEVOY: Yes, you would be
18 focusing on them but not singling them out as
19 being, giving them stricter regulations.
20 You'd be focusing on them because that's the
21 area where the organic seed industry has not
22 been developed. So understanding what is it

1 about that industry, why aren't they
2 developing organic seeds, and then making sure
3 that there's support structure and regulatory
4 structure to ensure that that occurs and not
5 putting all the burden on the small
6 diversified operations, a different problem,
7 and don't put that burden on operations that
8 the requirements, the additional requirements
9 imposed are not going to lead to increased
10 development, just reporting the percentage of
11 organic seeds used. Some of the other parts
12 of the proposal are quite good, and I have
13 written comments on this and made specific
14 recommendations of things to include and
15 things not.

16 MR. DAVIS: Thank you.

17 CHAIRPERSON DELGADO: Hugh?

18 MR. KARREMAN: Miles, thanks. At
19 the very end of your public comment, you
20 mentioned something about aquaculture. And I
21 was wondering if you could just simply either
22 summarize or, if it's short, like within two

1 paragraphs, if you could say what it is
2 because it's going to be entered in the public
3 comment I think we should know what it sounds
4 like.

5 MR. MCEVOY: Okay. This is not
6 comments from the Washington State Department
7 of Agriculture. This is comments from the
8 Puget Consumers Cooperative, a cooperative of
9 45,000 members in the Puget Sound area. And,
10 basically, they imposed the recommendations on
11 aquaculture, specifically around the open-
12 water net pens. And they're citing that
13 Washington State has been one of the key
14 states -- I'm not saying that this is true,
15 but this is what they're reporting -- that
16 have allowed open-net pens and that there's
17 been some significant environmental problems.
18 And that's in their comments. It documents
19 some of those specific environmental problems
20 for those open-water net pens.

21 The other thing that they bring up
22 in their comments is that the open-water net

1 pens have a negative effect or can have a
2 negative effect on the wild fisheries, the
3 family type of businesses that are quite
4 prevalent in Washington and Alaska. There's
5 a lot of trade or a lot of common businesses
6 that are based in Seattle but work up in the
7 Alaska fisheries. So they're saying that
8 these open-water net pens have a negative
9 effect on that industry.

10 CHAIRPERSON DELGADO: Steve?

11 MR. DEMURI: Hi, Miles. Thanks
12 for your comments. On the sign-in sheet I
13 have, it says you're on ethylene pears for
14 organic pears. You're up there in the pear
15 capital of the world. I'd be very interested
16 in hearing your comments on that.

17 MR. MCEVOY: Well, our organic
18 advisory board met and discussed this issue
19 just two weeks ago. And the board, the state
20 advisory board decided not to comment on
21 ethylene, not to support it or to oppose it.
22 There are a few fruit growers that did say

1 that that would extend the marketing season
2 for winter pears, so that's the real reason.
3 There was questions on, well, if it's allowed
4 for bananas, why not for winter pears?

5 There is a problem with winter
6 pears ripening. They don't ripen evenly, so
7 that's the whole concept is that if you allow
8 ethylene for organic winter pears they would
9 be able to have organic winter pears next to
10 conventional pears or be sold at the same time
11 of year as conventional pears. So that
12 currently can't occur with winter pears.
13 There's other types of pears that can be
14 marketed at that same time but not the winter
15 pears that need certain ripening. So what
16 they did with the organic pears is they put
17 them in a room and wait a couple of months
18 before they ripen and then they release them
19 to the market.

20 And the reason why the board
21 didn't feel comfortable commenting on this is
22 that, well, I guess they just didn't feel

1 comfortable. There wasn't consensus so . . .

2 MR. DEMURI: Do you have any
3 personal opinion on it?

4 MR. MCEVOY: Well, it seems like
5 if it's allowed for bananas why not for pears?

6 CHAIRPERSON DELGADO: Bea?

7 MS. JAMES: Do you have any
8 comments for us as far as how the approval of
9 ethylene for pears may affect the state of
10 Washington's development of their pears with
11 other importers bringing in pears at a greener
12 stage for ripening?

13 MR. MCEVOY: I don't know
14 specifically. I would say that probably we
15 would be able to out-compete them for the
16 winter pears. Pears grow quite well, just
17 like apples, in Washington state. About ten
18 percent of Washington's apples now are
19 organic, and about five percent of our pear
20 production is organic. And this would
21 probably increase the amount of organic pear
22 production in the state. I don't think it

1 would negatively impact. It would positively
2 impact our state because it's mostly being
3 promoted by the fruit packers in eastern
4 Washington and by the Washington Horticultural
5 Council, so they wouldn't be promoting this
6 unless they thought it would be promoting
7 Washington state pear production.

8 CHAIRPERSON DELGADO: Any other
9 questions? Tracey?

10 MS. MIEDEMA: Thank you. Thank
11 you, Miles. There seems to be a bit of a
12 philosophical underpinning in your approach to
13 the seed document, and you mentioned the
14 burden on smaller farms to burden on
15 certifiers. And I wondered if you could
16 comment from that same philosophical
17 feasibility perspective on the multi-site
18 recommendation? You mentioned, generally, you
19 were supportive but only in the very specific
20 circumstances.

21 MR. MCEVOY: Yes. I think that
22 NASOP and myself personally support the whole

1 concept of grower groups. And to have some
2 way of having the small holders have that as
3 a way of bringing organic product into the
4 U.S. market. But it needs to be done in a way
5 that protects organic integrity, so we don't
6 want to lose that integrity because then we
7 would lose the confidence of the consumers.
8 So I think that the proposal, as it's written,
9 has a lot of very specific aspects in there,
10 and maybe that just needs to be a little more
11 tight than it currently is.

12 And that's what the specific
13 proposal is: limited to producers, limited to
14 small holders that are under \$5,000 in sales.
15 I know that people don't like that definition.
16 There should be some kind of definition of
17 what is a small holder so it's not available
18 to everyone. And then it has to be a legal
19 entity because, otherwise, the certifier has
20 no body to take action against.

21 CHAIRPERSON DELGADO: Any other
22 questions?

1 MR. GIACOMINI: Just a follow-up.

2 When you say \$5,000 limit, do you want the
3 individual members within the grower group to
4 be under \$5,000 or the grower group to be
5 under \$5,000.

6 MR. MCEVOY: No, the individual
7 members of the grower group.

8 MR. GIACOMINI: Okay, all right.

9 MR. MCEVOY: And I don't know if
10 \$5,000 is the right number. But that would
11 enable them to then market their products and
12 still be certified organic.

13 CHAIRPERSON DELGADO: Any other
14 questions? Thank you. Our next speaker will
15 be John Foster, followed by Jim Pierce.

16 MR. FOSTER: Thanks to the Board
17 and the Program for your continued energy and
18 productivity. I know Earthbound really
19 appreciates it, and you don't get enough
20 gratitude for that. It's doing positive
21 change, and we really appreciate that. Thank
22 you.

1 My name is John Foster, and I'm
2 the Senior Manager for Organic Integrity at
3 Earthbound Farm. We're a large grower,
4 packer, shipper or organic fruits and
5 vegetables. Our main claim to fame is salad
6 mixes. We also do a lot of private label work
7 in Canada and the U.S. We also have a pretty
8 full line of all-organic fruits and
9 vegetables. We also do fresh sliced apples,
10 dried fruit, some baked good, all in organic
11 form. We pull products from around 200
12 suppliers and around 35,000 acres every year.
13 Also, to be fair, prior to coming to
14 Earthbound, I was involved pretty intimately
15 for well over a decade in organic
16 certification.

17 So I'm going to move real quickly.
18 As some of you know, I don't like reading, but
19 that's the only way I can get through this in
20 five minutes, so forgive me.

21 First, on commercial availability,
22 I've commented on this before, and I won't

1 reiterate that. I would only say that there
2 needs to be more attention on what certifiers
3 collect in their OSPs and of what operators
4 often omit or obscure in their OSPs, Organic
5 System Plans. That makes the certifier's job
6 more difficult. That happens a lot, and it's
7 very challenging for both operators and
8 certifiers.

9 I also want to point out that
10 there's a big difference between a certifier
11 collecting commercial availability information
12 in an OSP and having the resources the
13 condense and verify it and regurgitate that.
14 Those are two different things from a
15 certifier's point of view. So, in short, I
16 would ask that you hold certifiers accountable
17 absolutely for what they're accredited for,
18 but asking more than that you need to be real
19 creative with providing resources to make that
20 happen.

21 The second thing, on multiple site
22 operations, again something I've commented and

1 I won't reiterate, if you're going ahead with
2 this, first off I should say the current
3 recommendation, obviously, it shows a lot of
4 effort on this since the last iteration of it.
5 I think that's a good thing, no matter how it
6 turns out. The risk analysis provision I
7 think is particularly important.

8 It's also my opinion, though, that
9 there are a lot of accredited certifiers that
10 I wonder about the qualifications of staff to
11 implement that right now. So it would need a
12 lot of training, a lot of training, more so
13 than the regular training that's necessary on
14 that subject.

15 As some of you know, I'm a little
16 worried about the perception of the multiple
17 site certification. So if you're going to do
18 it, it needs to be done really, really
19 cleanly, really tightly, because it's going to
20 be the first place that someone is going to
21 try and drive a wedge into the integrity of
22 the Organic Program and industry.

1 Third, real quick, the
2 biodiversity thing, Earthbound, we're very
3 enmeshed in biodiversity and organic
4 intersections, particularly as a function of
5 the Leafy Greens Marketing Agreement. I spend
6 a lot of my time solving problems that growers
7 perceive as a function of conflicts. The LGMA
8 metrics really aren't, they aren't mutually
9 exclusive. It just takes more creativity on
10 how you fix that. That's going to be an
11 additional challenge to layer on just the
12 simple features for organic compliance and
13 biodiversity concerns. There's also in
14 California and now Arizona also LGMA concerns
15 that weigh heavily on this.

16 Lastly, the packaging/processing
17 aids and 100-percent claims, I appreciate this
18 as being a very complicated issue not easily
19 addressed. I think I agree with
20 recommendation number one. I would just ask
21 for clarity on what the "it" refers to. I'm
22 not sure if it means materials or equipment in

1 that. I'm not sure of the opening line of
2 recommendation two. I don't think that's a
3 true statement, certainly not all the time.
4 The precedents of recommendation three are a
5 little frightening to me, and the first clause
6 of four needs clarity and I think accuracy.

7 My biggest fear, actually, is
8 that, as written, I think it would motivate
9 some less-knowledgeable growers and handlers
10 to bypass essential food safety
11 considerations. And I'm not saying they would
12 do it deliberately or maliciously, but I think
13 there's a lot of poor insufficiently-educated
14 growers and handlers out there. And largely,
15 in order to differentiate their product in
16 their marketplace and make 100-percent organic
17 claim, my fear is that they would fail to
18 implement sufficient food safety protocols,
19 and that's something Earthbound knows quite a
20 bit about these days. So it would be
21 something I would argue pretty forcefully for
22 when the time comes. Thank you.

1 CHAIRPERSON DELGADO: Questions?

2 MR. SMILLIE: John, I really

3 respect your experience and your current

4 involvement in this, and one of the points,

5 philosophical points behind 100 percent is not

6 penalizing companies for doing proper food

7 safety. Rather than saying if you do this

8 operation to increase food safety, whether

9 it's nitrogen flushing or sanitizers, then you

10 lose the 100-percent label. Our intention was

11 we want them to do the food safety operations,

12 and we don't want them to lose 100 percent in

13 some of our cases.

14 So having said that,

15 recommendation one, can we just go through

16 them quickly? Because you referred to them

17 and I didn't have them in front of me. So

18 recommendation one, sanitizers, what was your

19 comment on that exactly?

20 MR. FOSTER: When you use the word

21 "it" in there, and I'm not sure whether "it"

22 refers to equipment or materials. It's toward

1 the end of the first line.

2 MR. SMILLIE: Okay. And number
3 two?

4 MR. FOSTER: Yes, what about it?

5 MR. SMILLIE: What was your
6 comment or recommendation on number two? When
7 it says hybrid cooling of produce, we've said
8 that if the microbials remain on the final
9 product and consume with it then it would be
10 a clue to 100 percent part.

11 MR. FOSTER: Yes, I think that
12 first clause is, I think it says that the
13 sanitizers do remain on the product, and
14 that's not always true. And I think that, I'm
15 not sure even if that's the right argument to
16 be making. But in terms of syntax, that's not
17 a true statement. Even if you use chlorine at
18 ambient temperatures, it off-gasses very, very
19 quickly. Citric acid might be different when
20 it's used as a pH buffer, but the chlorine for
21 sure.

22 MR. SMILLIE: So we should look at

1 that a little more carefully and be more
2 specific?

3 MR. FOSTER: Yes.

4 MR. SMILLIE: Number three, the
5 diatomaceous earth --

6 MR. FOSTER: Yes. Boy, my big
7 worry with that is if you -- let's see. Two
8 things. One, I think it's more important what
9 the activity being done to the product is,
10 rather than where it's being done to it. For
11 example, we do a lot of field pack of celery
12 hearts and romaine hearts. That's all done in
13 the field, but we use chlorine as wash water
14 in the field on the equipment but also in food
15 contact. So as I'm reading that, I'm thinking
16 that there's a lot of undiscovered country
17 there about whether you're deciding what's
18 processing versus what's post-harvest
19 handling, and is that a function of location?
20 Is it done in a processing facility? What if
21 the farmer has a building that they do this
22 thing in on the farm? Is that processing?

1 All of that, that's really murky in how this
2 is written right now, and I think putting
3 forward a recommendation like this without
4 going through that thought process is going to
5 be just another train wreck. Who's
6 responsible for train wrecks? That will be
7 very problematic. Again, both with respect to
8 just clarity but also with respect to food
9 safety concerns.

10 MR. SMILLIE: We agree. The
11 Handling Committee did this, and our purview
12 is -- CAC took this on, and we did not, we
13 missed that. And we realized that that is a
14 flaw in this document. We were addressing
15 processing operations, and we did not take
16 into account post-harvest handling on the
17 farm, the different viewpoints that that comes
18 from. So we have to go back and fix that. We
19 agree, and we're looking for more comments.
20 We've received some written comments on that
21 issue. So what I'm hoping, and we'll find out
22 in public comment because that's why you're

1 all here, is what parts of this have to go
2 back for re-work and what parts can be moved
3 forward.

4 Number four, did you have a
5 comment on that?

6 MR. FOSTER: I did, but I'm not
7 quite done with three yet, actually. The
8 other, it's not really philosophical but it's
9 more procedural, is the example that's used.
10 There's some, it's not just sanitation there.
11 There's some pest-control issues --

12 MR. SMILLIE: This one is just
13 that diatomaceous earth --

14 MR. FOSTER: Right. But its
15 utility is, in my experience, in that usage is
16 more pest control. Well, there's a whole
17 other -- what about pesticides applied in the
18 field? Obviously, that's an extreme example,
19 but by way of making a point --

20 MR. SMILLIE: Again, allowed
21 pesticides.

22 MR. FOSTER: Agreed. But it's

1 done in the field, and there seems to be a lot
2 of agreement that, before you cut the product,
3 that's a crop input, and then it gets hazy
4 after that. And that's what needs to get
5 really completely worked through the mill, I
6 think.

7 MR. SMILLIE: Agreed.

8 MR. FOSTER: And then number four.
9 Oh, boy, yes, when it says nitrogen, ozone,
10 CO2, and other inert atmospheric acids, I want
11 to be clear that, like, ozone is not an inert
12 gas. That should be really clear in there.
13 And carbon dioxide I would argue is not
14 either, but it's less active than ozone.

15 But this goes back to the question
16 I've asked a lot, which is when does something
17 stop being what it is and start being
18 something else? So when does manure, is there
19 a magic moment where manure becomes compost?
20 And that's what this gets to, particularly the
21 second line where it says "are not
22 incorporated into organic foods." Maybe with

1 argon that's true, but certainly not ozone,
2 certainly not CO2. There's some kind of
3 interaction there on some level. I would be
4 happy to have a discussion about how to get
5 through that. I don't have all the answers,
6 but I know it needs to be a work-through.
7 Otherwise, it's going to be yet another
8 problem to contend with six months or a year
9 down the road.

10 MR. SMILLIE: I apologize for
11 taking so much time, but I wanted to get all
12 this out.

13 CHAIRPERSON DELGADO: No, it was
14 very constructive. I appreciate that. Bea?

15 MS. JAMES: You made a comment
16 about the multi-site recommendation needing to
17 be really, really, really tight or potential
18 problems could arise and, you know, for us to
19 make it so that no wedges could get in there.
20 Can you give me a couple of examples of the
21 way that the multi-site is written site is
22 written currently where you see some openings

1 for problems happening?

2 MR. FOSTER: Where it's written
3 currently, or where it's implemented
4 currently?

5 MS. JAMES: The way that we have
6 it written currently.

7 MR. FOSTER: Okay. The current.
8 I'm not entirely, I have faith that the
9 Program will provide adequate training
10 documents, you know, as time goes on. I'm
11 completely confident in that. But I think
12 there's, let's see -- let me start over.
13 Because there's a perception of kind of
14 playing fast and loose sometimes with organic
15 regulations, oftentimes outside of U.S., I
16 think that the wedge I was talking about is
17 that if someone, if a non-organic minded
18 organization wanted to point fingers at
19 failures in organic integrity, that would be
20 an easy target if, in fact, there is a problem
21 that shows up, say, with, I don't know, coffee
22 or pick your commodity. It wouldn't really

1 matter the commodity, it would just matter it
2 would be more, if there is a failure, it could
3 be very public and I think very damaging
4 because it would make it easy, a very dramatic
5 example of someone being able to point and
6 say, "Well, see that stuff coming in from
7 overseas? That's not really organic." That
8 makes a lot of headlines and draws I think a
9 lot of negative press.

10 I'm not saying that the way it's
11 written right now, if it's implemented
12 perfectly, it's probably okay. But I think
13 it's more about the implementation of it, and
14 so the guidance about implementation and
15 training of certifiers and training of
16 inspectors would be, I think, more important
17 on this matter than it would be on some other
18 things only because the potential for negative
19 press for the organic brand as a whole is
20 pretty dramatic, pretty far-reaching.

21 CHAIRPERSON DELGADO: Any other
22 questions? Okay. Well, thank you very much.

1 At this moment, we're going to take a one-hour
2 break for lunch. We are running somewhat late
3 in time. And when we come back at exactly at
4 1:00, we'll have Jim Pierce start, followed by
5 Brock Lundberg.

6 (Whereupon, the foregoing matter
7 went off the record at 11:59 a.m. and went
8 back on the record at 1:04 p.m.)

9 CHAIRPERSON DELGADO: We are ready
10 to start. Mr. Jim Pierce.

11 MR. PIERCE: Mr. Chairman, thank
12 you so much for putting me on after lunch. I
13 feel like I'm saying a prayer before a circus,
14 but here we go. For the record, I'm Jim
15 Pierce, Global Certification Program Manager
16 for Oregon Tilth Certified Organic, a non-
17 profit organization that supports and promotes
18 biologically-sound and socially-equitable
19 agriculture through education, research,
20 advocacy, and product certification. With
21 1200 certified operators, we are not the
22 biggest NOP-accredited certifier, but we are

1 clearly the best.

2 Comments using the plural "we"
3 then refer to the universal "we," the queen's
4 "we," or, in this case, the tsar's "we."
5 These verbal comments will serve to reinforce
6 our written comments, which were included in
7 the soon to be best-selling DVD. My highly-
8 capable associate, Gwendolyn Wyard, will be
9 commenting later on your recommendations
10 pertaining to 100-percent organic materials
11 and pet food.

12 For what it's worth, I will focus
13 primarily on multi-site certification and
14 commercial availability of seed. I will not
15 discuss the very large elephant in this very
16 small and very warm room, that being pasture.

17 I will preface my comments with
18 these general observations. We commend you,
19 the appointees of the NOSB, for coalescing
20 into a group that is cranking out solid, well-
21 vetted, on time recommendations. Gone are the
22 five-day crams where we all grabbed printouts

1 on the way to the airport and wrote comments
2 on cocktail napkins.

3 I'm long on record with the NOSB
4 as a standards conservative and a materials
5 liberal. By that, I mean I have for years
6 encouraged this Board and Program to adopt
7 strict enforceable policy that preserves
8 organic integrity, while at the same time
9 reviewing and approving materials that are
10 appropriate for use in the system of organic
11 production without being overly prescriptive,
12 as with ethylene.

13 Today, I would go on record and
14 challenge you with another foundation
15 principles. Get your rock tablets and chisels
16 ready. Intent is far more important in your
17 recommendations than language. And I'll say
18 that again: intent is more important than
19 language. We need only to avail for a moment
20 the pasture pachyderm to see that when the
21 language of the NOSB and the NODPA group was
22 processed defined by the rule to include

1 mixing, grinding, churning, separating,
2 extracting, slaughtering, cutting, fermenting,
3 distilling, and eviscerating, the language not
4 only becomes as unrecognizable as a whole hog
5 is to a bratwurst, but the intent is seriously
6 jeopardized.

7 Like the pasture elephant in the
8 room, there's an elephant in the multi-site
9 recommendation. Although alluded to, the
10 recommendation does not clearly define retail
11 and process requirements. On the record and
12 testifying in the past in support of multi-
13 site certification. We currently certify
14 grower groups in Latin America. We expect
15 each and every farm the first year and, as
16 expressed as a concern by the minority
17 opinion, we inspect every new operation in
18 subsequent years.

19 Internationally, the intent of
20 grower groups is clearly stated on page two of
21 that recommendation, "to assist producers and
22 handlers from less-developed areas into

1 reaching organic markets." That said, please
2 be clear, clear as in transparent. Address it
3 head-on. Introduce us to the elephant. If
4 this recommendation is intended to be applied
5 to retailers and processors, then this
6 recommendation must include language specific
7 to that sector.

8 Regarding organic seed, which
9 allows me to say, as written by the NOSB JCC
10 ACC, as with grower groups, international
11 perspective is important here. It's worth
12 mentioning to you that the world watches as
13 you make recommendations. The intent of the
14 issue is not only clear but clearly stated in
15 B3 of the recommendation, namely "verify that
16 organic farmers are making a sincere and
17 ongoing effort to find organic seed variety
18 suitable to their farm." Whoever wrote that,
19 raise your hand and be recognized.

20 Evaluating equivalency as a factor
21 is a good idea, a great idea in fact. Non-
22 organic seed varieties could arguably be

1 better suited to assist in organic farming
2 than organic high yield and hybrids, which
3 perform at the expense of biodiversity.

4 Yesterday at the Organic Coalition
5 meeting, my colleague, Jim Whittle, urged us
6 to support the allowance of treated foundation
7 seed in order to develop better organic seed
8 lines. We urge you, therefore, to consider
9 his comments.

10 In closing, I refer you back to
11 the written comments and urge you to continue
12 networking with and including your
13 constituents. By doing so, you will enhance
14 the hallmark of NOSB transparency. As long as
15 you continue to stay true to your
16 constituents, we all are on this Board, albeit
17 without the lavish expense account.

18 Finally, and I mean that, as
19 witnessed by pasture pachyderm, your term,
20 sentence if you will, as NOSB members
21 unfortunately does not end after five years.
22 You owe it to yourself, your fellow board

1 inmates, your constituents, and to the
2 National Organic Program to remain engaged
3 post-appointment, posthumously if necessary,
4 as your recommendations are processed through
5 the USDA sausage grinder in order to guarantee
6 that the intent of your recommendations stays
7 true. Thank you.

8 CHAIRPERSON DELGADO: Any
9 questions? Kevin?

10 MR. ENGELBERT: Jim, thank you
11 very much. How do you enforce intent?

12 MR. PIERCE: Well, Joe referred
13 earlier to a spirit, which I think is as good
14 as intent. My challenge to you would be to
15 don't write rules for change. Write rules for
16 the ones who intend to follow the intent, and
17 let compliance and enforcement and the process
18 which is in place, accreditation and
19 enforcement, follow-up after the ones who are
20 operating outside of the intent. It's a fine
21 line, and I understand. And I think most of
22 the recommendations you have come up with here

1 are true to that intent without being too
2 overly prescriptive. I hesitate with that
3 last part because that's where I think, in
4 some cases, you've overstepped your purview by
5 trying to write the rules for the cheaters, as
6 opposed to the vast majority of organic
7 farmers who are not.

8 MR. ENGELBERT: The reason I ask
9 is because a lot of what we see is writing the
10 rules that can't be attainable. But the
11 intent is not being enforced.

12 MR. PIERCE: And that's absolutely
13 true. I could argue that the intent of the
14 current pasture rule could be enforced, it
15 simply has not been enforced. We've heard
16 that argument repeatedly. We're not talking
17 about pastures but just, in short, as long as
18 these follow-up recommendations in this
19 proposed rule enforce and support that intent
20 of the original rule, then it's fine. As they
21 get further into new regulation, new record-
22 keeper requirements, new certification

1 requirements, I think they become more of a
2 burden than an aid. That's all. MR. ENGELBERT:
3 Well, I agree. But if all we had to worry
4 about was intent, this job would be much more
5 simpler.

6 MR. PIERCE: So would the tax
7 code, but I would challenge you to take a look
8 at the tax code. And it's huge, and people
9 still cheat. You know, at some point, you've
10 just got to find your balance.

11 CHAIRPERSON DELGADO: Any other
12 questions? Bea?

13 MS. JAMES: You mentioned that the
14 retail sector wasn't the same from the multi-
15 site recommendation. Does the Oregon Tilth
16 support the idea of retailers following that
17 kind of a platform?

18 MR. PIERCE: Yes. As long as it's
19 clearly stated and where there's different
20 requirements for growers versus processors and
21 retailers, assuming what that says is
22 acceptable, we would be willing to do that.

1 And I think Oregon Tilth is out of the main
2 stream of certifiers when we say that. Now,
3 I know, as part of the ACA, that's the
4 position.

5 CHAIRPERSON DELGADO: Any other
6 questions? Kevin?

7 MR. ENGELBERT: That brings up a
8 question then. If you think that retail will
9 fall in that purview, how are we allowing them
10 to have, really protect the integrity of
11 organics and benefit consumers?

12 MR. PIERCE: Well, the proposal,
13 the recommendation that's out has been refined
14 a couple of times. And I think by going back
15 to that weighted scale of inspection and re-
16 certification criteria, that helps a lot.
17 And as long as everybody is inspected first
18 time, new time, and with new inspectors and
19 all the high-risk ones, I think we would
20 probably internal control system, if it can be
21 maintained. In fact, probably, because it's
22 a first system what you're proposing there

1 with retailers and processors, they have
2 systems in place, they have computerized
3 records; whereas, the third world farmers and
4 the emerging farmers typically do not. It
5 would be easier for them to comply and to
6 maintain that integrity and of consumer
7 concern, as it is with the farms in the third
8 world. And we've seen that model work.
9 That's actually a high-risk model because
10 there is less literacy and less first world
11 knowledge of how to do an internal control
12 system in audits and follow-ups, and, yet, it
13 does work.

14 CHAIRPERSON DELGADO: Bea?

15 MS. JAMES: I just wanted to also
16 comment to your question, Kevin, that retail
17 certification is voluntary. And if we create
18 a situation where it's too restrictive for
19 retailers to be able to be certified, that
20 compromises consumers' ability to have that
21 additional enforcement for education.

22 CHAIRPERSON DELGADO: Any

1 questions? Well, thank you very much, John.
2 Next on is Mr. Lundberg, followed by Grace
3 Marroquin.

4 MR. LUNDBERG: Okay. Thank you
5 very much for allowing me to share my
6 perspectives about our petition to include
7 dried orange pulp and 205 606.

8 MS. FRANCES: Could you identify
9 yourself?

10 MR. LUNDBERG: My name is Brock
11 Lundberg, and I'm with Fiberstar, the Vice
12 President of Technology for the company. And
13 to give you a little bit of a background about
14 Fiberstar, we're a privately-owned research
15 and development company. Our objective is
16 improving food freshness and nutrition to
17 enhance natural fibers. We have an exclusive
18 license that we license from the University of
19 Minnesota, and the concept of our technology
20 is to add value to agricultural byproducts and
21 residues, and that's how the company was
22 initially founded.

1 I worked on this project as a
2 graduate student at the University of
3 Minnesota, started in 1998. And then in 2001,
4 we began commercializing the project. We
5 actually built our first production plant in
6 2004. The dried orange pulp is the only
7 product that we produce. It's a unique
8 product with functionality and many different
9 applications, for bakery to meat. The dried
10 orange pulp is made only from orange cells.
11 It's the same pulp that you see in orange
12 juice, but we take the leftover pulp that the
13 processor doesn't have that would otherwise go
14 to cattle feed, and that's what we use as our
15 raw material.

16 There's no chemicals in the
17 process. It's just mechanical grinding and
18 drying. The raw material has 95 percent
19 moisture, so it has a lot of moisture to begin
20 with that is very energy intensive in terms of
21 just drying the product. That's how we get it
22 in the final form.

1 And it's a unique fiber that isn't
2 produced by other manufacturers. We have the
3 patented technology for the process and for
4 the fiber, and that's the functionality we
5 offer to our customers for fat replacement,
6 reducing calories, moisture retention, and
7 bakery. And that's part of the reason why
8 we're here is actually from requests
9 specifically by our customers. Three or four
10 of our customers specifically ask for being on
11 the National List. And the product is also
12 grass with GRN 154 and approved for use in
13 certain USDA products.

14 I decided to show a photo of our
15 production plant. We produce this product in
16 Florida. You can see, here's a photo of the
17 outside of the plant. Our raw material is
18 pumped directly from the adjacent orange juice
19 processing operation, so it flows over the
20 bridge through the pipelines to our facility,
21 and we immediately process it in this building
22 right here. This is the facility that we

1 built in 2003 and 2004. You see the interior
2 part of the plant, the processing equipment.
3 This is the internal wet side, and then right
4 after it's stabilized through the heat
5 exchangers, we go through and we dry it and
6 package it. This is a photo in our packaging
7 room. So it's a fairly simple process, and
8 this is where we produce the product, right
9 next to the orange juice operation in
10 Clewiston, Florida.

11 Our process, we make 20,000 pounds
12 of dried product on a day, which equates to
13 400,000 wet pounds of pulp. That's our raw
14 material. We pump the raw material from the
15 adjacent Southern Gardens, and it arrives in
16 less than ten minutes. Just basically from
17 the time that it's squeezed, it goes through
18 finishers, and we pump it over to our
19 operation. We designed the operation this way
20 so that we could reduce or prevent any
21 deterioration in the raw material prior to its
22 arrival to our plant.

1 The raw material has a high-
2 moisture content that's very thick. It has
3 residual sugars in it, and it just all is
4 conducive to high bacteria growth or enzyme
5 growth. And we process it on a continuous
6 basis, we don't operate in batches, just so
7 that we can keep the material flowing all the
8 way through the process. And we don't collect
9 or store or transport any pulp to our
10 operation in Clewiston, and the reason is
11 because of the high moisture content and the
12 rapid rate of decay of the raw material.

13 Okay. Concerning the availability
14 of organic orange pulp, first just starting
15 with the number of oranges measured in boxes,
16 there's 2.69 million boxes of oranges made in
17 the year and about 65 percent of that goes
18 into juice. And when we talked to the top
19 three organic processors in Florida, there's
20 250 to 375 pounds of pulp available on an
21 annual basis, which is, if you remember, less
22 than the amount that we can process in one day

1 at our plant. There's a lot of oranges grown,
2 organic oranges grown, both in Florida and
3 California. But we're not working with
4 oranges, we're working with the pulp; that's
5 our raw material, and we need to be close to
6 the orange juice processing operation. And
7 the pulp needs immediate treatment; otherwise,
8 it's going to be deteriorating.

9 Here's a slide just showing a map
10 in Florida where our operation is. This is
11 right down here in the red, and the closest
12 organic pulp operation is 108 miles away. And
13 our raw material supplier doesn't produce
14 organic oranges just because it's a large
15 operation and they produce 20 million boxes --

16 CHAIRPERSON DELGADO: Your time is
17 up.

18 MR. LUNDBERG: Okay. And there
19 isn't the supply of organic fruit within the
20 area. And then the transportation, just
21 regarding, again, there's less than one day's
22 organic pulp supply for us.

1 In conclusion, the organic orange
2 pulp supply is not commercially available for
3 us. There's no organic orange producers
4 located next to our production facility, plus
5 the amount of total organic orange pulp in
6 Florida is not large enough for us to feasibly
7 transport. The transportation is expensive,
8 especially when the closest processor is 108
9 miles away and we're dealing with a material
10 that's 95 percent moisture.

11 CHAIRPERSON DELGADO: Thank you.
12 Any questions?

13 MS. WEISMAN: Yes. I can
14 definitely appreciate the difficulty of having
15 equipment that requires, you know, vast
16 quantities. But I'm wondering if you can make
17 any comment about what are the obstacles to
18 smaller-scale equipment being designed that
19 would be more appropriate? I imagine that
20 there's not even a market out there for the
21 amount of organic dried orange pulp, even if
22 the raw material were available.

1 MR. LUNDBERG: If the raw material
2 were available, there is market available,
3 definitely. So I do want to make that point.
4 That's why I'm here is because of the needs
5 and demand for organic orange pulp. It's not
6 available, but we're trying to do the next
7 best thing so that the suppliers, our
8 customers, can have a functional ingredient
9 they can use in organic products. But there
10 is certainly equipment that could be used, but
11 the amount, I mean it's less than, it's a half
12 a truckload of finished product per year. And
13 we're sending out, typically, every week,
14 we're sending three to four truckloads out.
15 So just the sheer numbers, it wouldn't work
16 for anybody based on 20,000 pounds available
17 in a year versus us being able to make three
18 million pounds. So the problem is really just
19 the size. It's in the numbers, the
20 availability.

21 CHAIRPERSON DELGADO: Kevin?

22 MR. ENGELBERT: If this pulp was

1 transported, if any pulp was transported in a
2 frozen state, or at 32 degrees, would that
3 solve a problem with the transportation that
4 would allow this organic pulp to be converted
5 into the dried pulp?

6 MR. LUNDBERG: It is possible, but
7 the other problem with transportation is, even
8 at 95-percent moisture, the material looks
9 like mashed potatoes, so it's not easily
10 pumpable. It would have to go into something
11 like drums, or something that you can dump so
12 that you don't have to, because you can't put
13 it in a tanker or anything like that. But it
14 would have to be treated septically still,
15 because it still has a very high amount of
16 enzymes in there that, even if it's frozen or
17 refrigerated, I guess frozen that you wouldn't
18 have the growth, but even refrigerated
19 conditions, it's still going to grow the
20 enzymes.

21 But the cost still, and if you
22 move a truckload, 40,000 pounds, you're going

1 to get 5,000 pounds of finished product. So
2 that's the issue. But our 2,000 pounds of
3 finished product based on a 40,000 pound load,
4 so transporting that is going to add a dollar
5 to your cost on a pound basis. It is possible
6 if the numbers were there, but the problem is
7 the numbers in terms of available raw material
8 are so low that -- it's just a lot of
9 technical issues that we have to deal with.

10 CHAIRPERSON DELGADO: Dan?

11 MR. GIACOMINI: If you could, as
12 succinctly as you can, you gave us sort of the
13 breakdown of what's it used for as far as fat
14 replacement and that kind of thing, can you
15 give us a little better picture than that of
16 where and how it's being used in the industry,
17 and to really see that it fits in as a place
18 in the organic community?

19 MR. LUNDBERG: Sure. I would say
20 there's two different categories. One is in
21 fiber, like in general, fiber for, a lot of
22 different fibers: the oat fiber, wheat fiber,

1 lots of different things like that.

2 And then the second area is in hydrocolloids,
3 where you have different types of gums that
4 are used for stabilizing, thickening, fat
5 replacement, emulsification. Those are the
6 general applications, but what our product is
7 unique in what it offers is delivering that
8 functionality with something that's extremely
9 simple. And we don't use any chemicals. All
10 it shows up is dried orange pulp on the label.
11 So we're delivering a functional product, but
12 we're able to replace gums, whether they're
13 chemically synthesized or not, we're replacing
14 those things that have long names on them that
15 people don't understand with a very label-
16 friendly, all-natural dried orange pulp that
17 everybody can understand.

18 And it's used, our biggest
19 customer is actually a meat product for
20 emulsifying and for providing thickening in a
21 meat. Those are our biggest customer.
22 Bakery, in the 100-calorie packs that you see,

1 products where they're designing them to
2 reduce calories, that's what our product does.
3 It's just water and dried orange pulp that can
4 be used as the filler to take out much higher
5 caloric ingredients.

6 CHAIRPERSON DELGADO: Any other
7 questions?

8 MS. ELLOR: A couple of questions.
9 You mentioned that it's stabilized before it's
10 processed?

11 MR. LUNDBERG: Yes.

12 MS. ELLOR: Okay. Then how long
13 is that stabilized product -- how stable is
14 the stabilized product? Could that be
15 shipped? Taking out the moisture issue, that
16 could be shipped?

17 MR. LUNDBERG: It could be shipped
18 if it were refrigerated, yes.

19 MS. ELLOR: Okay. And here's the
20 other question I have. How shelf stable is
21 your final product?

22 MR. LUNDBERG: It's three years.

1 MS. ELLOR: Three years. So
2 presumably, you could collect a mass of
3 organic pulp, and then match that up with the
4 demand for organic if the finished product has
5 organic pulp?

6 MR. LUNDBERG: Yes. If the supply
7 of organic pulp is available, yes.

8 MS. ELLOR: So you could process
9 all the organic pulp available in an organic
10 form and have --

11 MR. LUNDBERG: We could do it,
12 yes. But if there was available organic pulp,
13 we would, I mean, for efficiency reasons, we
14 would do exactly what we've done at Southern
15 Gardens, and that is to install a production
16 plant adjacent to the raw material supplier in
17 a central location. I mean, the best way is
18 to pump it, and then we can avoid all the
19 handling and deterioration costs. But yes,
20 the answer to your question is yes.

21 CHAIRPERSON DELGADO: Steve?

22 MR. DEMURI: Tina asked part of

1 the question I have, but I want to make sure
2 I'm perfectly clear. If you brought all the
3 available organic orange pulp from the United
4 States to your plant, you still would not have
5 enough to produce on your equipment?

6 MR. LUNDBERG: No. According to
7 the numbers, there's 2.69 million boxes of
8 oranges produced in the United States that's
9 processed into orange juice, and that compares
10 to the operation, that's over the total United
11 States. At our citrus plant, they produce 20,
12 so it's not quite 10. Maybe it's 15 times
13 more production at Southern Gardens Citrus
14 compared to what there is in the entire United
15 States. So although it is a growing industry,
16 from what we understand, at this time it
17 doesn't have quantity available for us.

18 MR. DEMURI: To follow-up on what
19 Julie asked you, you don't think you could
20 design a smaller plant closer to a source?

21 MR. LUNDBERG: Yes, we could.

22 CHAIRPERSON DELGADO: Any other

1 questions? Thank you very much. We're moving
2 on now to Grace Marroquin, and remind the
3 Board that we still have 50 on the schedule,
4 so let's concentrate on the issues. After
5 Grace, we'll have Christine Bushway.

6 MS. MARROQUIN: Hello, everybody.
7 Good afternoon. My name is Grace Marroquin.
8 I'm President and CEO of Marroquin Organic
9 International in Santa Cruz, California. I
10 founded my company in 1991. That's right, 17
11 years ago. And we are importers and suppliers
12 of organic ingredients.

13 Once again, I'm back, and I'm here
14 to address the Board, just as I have done
15 almost every year since 2004, that's one, two,
16 three, four years. Organic yeast was
17 developed in Germany and introduced
18 commercially in the 1990s. I have introduced
19 many organic ingredients on the basis and
20 principle of organic preference. When I
21 learned that organic yeast was available, I
22 was really excited, because this was another

1 breakthrough in organic ingredients. And I've
2 been around since before organic sugar, since
3 before organic non-fat, since before organic
4 starch, even since before organic basil. And
5 believe me, I was a baby. And I was there,
6 and it was all done on the principle of
7 organic preference. If it was available, it
8 would be used.

9 Organic yeast is grown on the
10 substrate of organic grains instead of
11 conventional grains. And I know you've heard
12 me say this, but I'm going to say it once
13 again, that above all, organic yeast avoids
14 many synthetic chemicals used in the
15 production of organic yeast. And this is
16 ammonia and ammonia salts, sulfuric acid,
17 caustic soda lyes; all these are pH
18 regulators, synthetic vitamins, and synthetic
19 anti-foaming agents. These ingredients are
20 not allowed in organic production in and of
21 themselves, but yet they're coming in through
22 the back door through organic yeast.

1 Because these chemicals are all
2 used to produce conventional yeast, the waste
3 water has to be heavily treated in order for
4 it to be disposed of. In organic production,
5 the waste water from the yeast is used to make
6 further organic products.

7 Despite the fact that organic
8 yeast is available and is not required as an
9 organic ingredient because of the loophole, in
10 order for it to be organic, yeast must be
11 first considered agricultural. The NOP said
12 in 2004 it would not require processors to use
13 organic yeast, and told us that we had to
14 petition to reclassify it. So this we did.
15 So we were petitioning to reclassify it for
16 non-agricultural in Section 205.605(a) to
17 agricultural in 205.606.

18 Since 2004, we've been asking the
19 Board to make this change. Very, very, very,
20 very few companies would have persisted this
21 long. Anybody with an innovative organic
22 ingredient certainly would have backed down by

1 now, because it would not have been cost
2 effective, and they probably lack the
3 commitment, and they probably are not insane
4 enough to try this process for this long.

5 And when you're talking about the
6 ingredient, you're not just talking about the
7 one ingredient. They bring an innovative
8 ingredient to marketplace, and as a result,
9 more organic flour is being used, more organic
10 milk is being used, more organic sugar, nuts,
11 and it goes on and on; thus, more land goes
12 into organic production, and that's what, for
13 me, it's all about.

14 In September of '06, the Combined
15 Handling Materials Committee voted 8 to 0 to
16 yeast in 205.606. This was based on the
17 conclusion that yeast was an agricultural
18 product. According to the definitions of OFPA
19 and the NOP final rule, at the 2006 meeting
20 the Board discussed this recommendation and
21 voted not to act on it immediately because it
22 needed to examine two issues, and one was

1 that, if yeast was reclassified as an
2 agricultural product, it would require yeast
3 supplements in the livestock feed to be
4 organic, and they wanted to examine the impact
5 of this. And then the other issue was there
6 adequate standards.

7 This was the Board's plan in 2006,
8 and since this, this has not been addressed.
9 Meanwhile, in the last two years, the European
10 Union has made great strides to recognize
11 organic yeast. In 2007, the EU established
12 that yeast is eligible to be organic both in
13 food and in feed, and in fact, the EU has
14 adopted the general standards. We just
15 received word of this, and it's going to be
16 published at the end of this year into final
17 rule.

18 In conclusion, we request that the
19 Board do the following: on the livestock feed,
20 we request that the Board do what it said two
21 years ago, and to ask for public comment
22 regarding the impact on yeast supplements in

1 the feed. On the question of standards for
2 production of yeast, we're asking that you
3 look at the EU standards which are about to be
4 published.

5 In addition, the Board may
6 recommend moving yeast to 205.606 without
7 specific standards being in place. Yeast is
8 a fungus and a mushroom. The beautiful little
9 mushroom is also another fungus that is being
10 certified right now without NOP standards.
11 Under the NOP policy statement of August 23rd,
12 2005, agricultural products may be certified
13 if they comply with the NOP standards without
14 specific standards in place. And thirdly, on
15 the question of recognizing the
16 microorganisms, we ask that you put this aside
17 from the yeast as an agricultural product.
18 We're requesting the Board to defer this. No
19 bacteria, including any dairy cultures, are
20 being produced organically. And until this
21 occurs, there is no basis for requiring that
22 all bacteria in feed be organic. So yeast is

1 a separate case, because organic yeast is
2 available.

3 So ending, this is the approach
4 that the EU has taken. The EU regulation
5 singles out yeast from other microorganisms,
6 and it declares that yeast is eligible to be
7 organic, but does not do the same for
8 bacteria, enzymes, or microorganisms. These
9 remain on a restricted list on the organic
10 materials that are permitted for the EU.

11 I thank you all. I know this has
12 been very trying, just like for me, but we
13 need to push through this. It's overdue.
14 Thank you.

15 CHAIRPERSON DELGADO: Any
16 questions? Dan?

17 MR. GIACOMINI: I just think it's
18 -- thank you for your comments. I think it's
19 only fair that we do address that this is one
20 of the main issues that's been tried to be
21 tackled by the Materials Working Group of
22 which you're part of. So to say that we have

1 not done anything, we helped set up that
2 group. Members on this committee are working
3 with that group, that group is coming back to
4 us now for the second time and making
5 recommendations to that. I think we've been
6 looking at it to a certain extent. To say
7 that we have done nothing on those two issues
8 I think --

9 MS. MARROQUIN: I didn't mean it
10 quite like that. I meant, regarding asking
11 for comments from the livestock industry,
12 nothing's been done on that, and that was
13 asked two years ago. And yes, the Material
14 Working Group has been informed. But we're
15 tackling the entire universe of agriculture,
16 and I know that we're trying to define it.
17 But it's -- as I mentioned, it's pretty
18 frustrating for a company trying to get into
19 this. The commitment's not there. And to
20 tell you the truth, I know that there are
21 manufacturers of organic yeast who can produce
22 organic yeast. And in fact, some of them are

1 producing organic yeast for feed, but they're
2 waiting. You know, there's no reason to raise
3 the bar right now. There is no motivation to
4 raise the bar, and it's unfortunate that we're
5 no longer operating from organic preference
6 like we used to. It used to be easy. If it
7 was agricultural, you could use a non-organic
8 if you could prove that, you know, no sewage
9 sludge, you know. It met, no GMOs, no
10 irradiation, and it could be used. And if all
11 the processes were in place and accepted, then
12 it could be used, and then the motivation came
13 to produce something organically, because then
14 you'd be the person on the market.

15 This guy with Fiberstar, there's
16 another citrus company doing this now, and
17 they're producing a product that, in the
18 organic industry, we need organic antioxidants
19 to preserve the shelf life of bread. This
20 replaces BHT and BHA. We need it, but where's
21 the motivation to do it? And is he going to
22 come up here for four years? I don't know.

1 I doubt it, but that's just my opinion.

2 But again, I really appreciate,
3 because this is a tough process, and it's
4 frustrating.

5 CHAIRPERSON DELGADO: Joe?

6 MR. SMILLIE: Well, as you know,
7 Grace, I support your position, and I think
8 that you're right. Unfortunately, as we
9 discussed earlier, in the formation of the
10 National List issues, you got stuck with this
11 flaw. And what we're trying to do is very
12 frustrating for you and for us, too, is we've
13 got to fix it all. You know, we really have
14 to fix the whole thing, because yeast is just
15 a very good example of a material that's been
16 abused because of the initial structure we
17 were handed. And unfortunately, you know,
18 you've suffered because of that.

19 Bu, again, we've made a couple of
20 attempts to try and fix this little piece, and
21 I guess the cumulative wisdom of the Board is
22 we have to fix the whole thing, and that's

1 what the working group is for. And hopefully,
2 I won't be off the Board, because I love
3 hearing you every year. And hopefully, we'll
4 get a fix that will not only bring justice to
5 yeast producers, because I agree with you, you
6 can produce yeast organically, and you can do
7 it with the standards we currently have. The
8 mushroom example is an example of that. I
9 feel confident that a decent certification
10 organization can create the rigor to justify
11 its production as an agricultural product.

12 But we're sitting there face-to-
13 face with the National List, and I think the
14 Board has decided that we're going to fix the
15 whole structure, and give yeast its proper
16 place rather than just taking an action on
17 yeast alone.

18 MS. MARROQUIN: Okay. Well, I
19 thank you, and I guess I'm just here to urge
20 it along.

21 CHAIRPERSON DELGADO: Hugh?

22 MR. KARREMAN: Yes. Grace, thanks

1 for coming in again, and I feel bad for you.

2 MS. MARROQUIN: I'll send you my
3 bill.

4 MR. KARREMAN: How exactly is it
5 that the Europeans did it? Can you somehow
6 figure out in the Materials Working Group how
7 they -- I mean, you explained how they did it,
8 but how you could somehow merge it, or somehow
9 with the way it is now, or until the Ag/Non-Ag
10 gets fixed? Because obviously, I guess
11 they've done it.

12 MR. MARROQUIN: Yes, well they did
13 it. And I think, because of all the
14 ingredients, part of its composition, I
15 believe, and you can correct me if I'm wrong,
16 but it's almost like 98 percent of all
17 ingredients in the yeast, if not 99, are all
18 organic. And what they did was, you know,
19 they just separated out, because it's really
20 the issues of bacteria and enzymes and
21 microorganisms that sends everybody spinning
22 out into outer space so that they can't, you

1 know -- I remember a long time ago we talked
2 about the low-hanging fruit and the high-
3 hanging fruit. Well, this is a low-hanging
4 fruit. And what they did was they separated
5 it out, and that was a way for them to be a
6 little bit more clear about looking at the
7 issue and being able to move it in a decision.

8 And actually, what's going to
9 happen now is any organic product in the
10 United States that's made that has yeast, and
11 there's lots of them, there's crackers, and
12 pretzels, all baked goods all have yeast in
13 it, those products will not be able to be
14 exported now to Europe once this rule is in
15 place, which again, it's in its final
16 coalition state at the end of the year, will
17 not be able to go in that direction. So
18 they're going to have to come up with a
19 solution to be able to go that way.

20 MR. KARREMAN: Do you have a smart
21 lawyer that can figure out the way they did it
22 into our system?

1 MR. SIEGEL: This Board, in
2 October of 2006, wrote a very clear, simple,
3 straightforward policy recommendation that
4 came out of the Combined Handling and
5 Materials Committee 8 to 0. Yeast should
6 become an agricultural product under 205.606
7 because that's what the definition in OFPA
8 calls for. And that was a good start. There
9 was a discussion of what the remaining
10 outstanding issues were. One was standards,
11 and the other was livestock feed, and those
12 two issues we thought were going to be
13 specifically addressed at that time to clean
14 this matter up. And the past two years,
15 nothing has happened in that direction.

16 MS. MARROQUIN: But regarding the
17 EU, I know that was the question.

18 MR. SIEGEL: Yes. Well, the EU is
19 different because it doesn't have the non-
20 agricultural box that yeast is in. Yeast was
21 one of a number of ingredients that could be
22 used as non-agricultural, and the EU decided

1 yeast could be pulled out of the pack and
2 given a special status, and that's what they
3 did. And that's what this Board was ready to
4 do two years ago.

5 CHAIRPERSON DELGADO: Could you
6 identify yourself for the record?

7 MR. SIEGEL: Richard Siegel,
8 counsel to Marroquin Organic International.

9 CHAIRPERSON DELGADO: Thank you.

10 MS. MARROQUIN: Don't forget about
11 non-plant life. Non-plant life.

12 CHAIRPERSON DELGADO: Any other
13 questions? A question for the Chair of the
14 Materials Committee, remind us please, on the
15 target days to finalize the issue, and also
16 the follow-up to the Non-Ag? What is the
17 status of that?

18 MR. GIACOMINI: The goal is for,
19 hopefully, we will be able to come up with
20 something from the Board at the end of '09
21 before we start having a huge tremendous
22 turnover. Board members, again, will then

1 require a tremendous amount of re-education.

2 CHAIRPERSON DELGADO: And that
3 would include the two questions?

4 MR. GIACOMINI: And that will be as
5 much as we can possibly tackle.

6 CHAIRPERSON DELGADO: So we're
7 addressing the issue, and we're trying to move
8 forward on that one as soon as possible, so
9 please bear with us.

10 MS. MARROQUIN: Thank you,
11 everybody. You're doing a good job.

12 CHAIRPERSON DELGADO: Okay. Next
13 on, we'll hear from Christine Bushway, and
14 that is followed by Tom Hutcheson.

15 MS. BUSHWAY: Hi. I just wanted
16 to take a minute to introduce myself. I'm the
17 new Executive Director of the Organic Trade
18 Association, and having been there about two
19 months now, I can tell you it feels sort of
20 like peeling an onion getting the whole
21 organic industry under my belt. And as I get
22 from layer to layer, I find there's more

1 layers. So I just wanted to say hello, and
2 say that I look forward to working with you.

3 CHAIRPERSON DELGADO: So nice to
4 meet you. Thank you very much --

5 MS. BUSHWAY: Thank you.

6 CHAIRPERSON DELGADO: -- for
7 taking the time to introduce yourself. Any
8 questions from the members of the Board? We
9 certainly recognize the work the OTA has done
10 all along in support of this Board, and we
11 welcome you to your new post.

12 MS. BUSHWAY: Great. Thank you.
13 I'm enjoying it. Thanks a lot.

14 CHAIRPERSON DELGADO: Dan?

15 MR. GIACOMINI: Yes. As Chairman
16 of the Materials Committee, I would also like
17 to thank you for the continuing support you've
18 given to the Materials Working Group, and the
19 resources that you've applied to that in
20 offering us the conference call.

21 MS. BUSHWAY: Absolutely, we
22 continue to do that. Anybody else? Thanks a

1 lot.

2 CHAIRPERSON DELGADO: Now we move
3 on to Tom Hutcheson, followed by Ed Maltby.

4 MR. HUTCHESON: Good afternoon,
5 everyone. Tom Hutcheson, Regulatory and
6 Policy Manager for the Organic Trade
7 Association, OTA. OTA is the membership-based
8 business association for organic agriculture
9 products in North America. Our over 1600
10 members include growers, processors,
11 certifiers, farmers' associations,
12 distributors, importers and exporters,
13 retailers, and others. OTA's mission is to
14 promote and protect the growth of organic
15 trade to benefit the environment, farmers, the
16 public, and the economy. If you're not a
17 member and you want to, see me, or go online
18 24/7, OTA.com. Please refer to our written
19 comments for more detail on all the issues
20 covered here.

21 On technical reviews, it is our
22 understanding that a qualified member of the

1 NOSB may undertake a technical review of the
2 petitioned material, and that a subcommittee
3 of the NOSB can constitute a technical
4 advisory panel. We have provided suggested
5 definition revisions in our written comments.

6 On the Materials Working Group
7 document, OTA urges you to favorably consider
8 option number two, which calls for a revision
9 to the definition of non-agricultural, and
10 which offers two alternate definitions.

11 Please find our detailed rationale in our
12 written comments, including some proposals
13 concerning Section 606. We also hope you'll
14 consider our recommendation revising the
15 definition of non-agricultural, and initiate
16 provisions for reclassifying as agricultural
17 appropriate substances presently listed on
18 605.

19 On multi-site operation
20 certification, we urge adoption of this
21 document by the NOP as a guidance document.
22 We do not support the minority opinion, as it

1 could pose an unfair burden on newly-forming
2 producer groups, especially when a family
3 member or former employee of an existing
4 member whose experience with organic
5 compliance might become a new member.

6 On the 100 percent recommendation,
7 we agreed with the recommendation of neither
8 sanitizers used on processing equipment, nor
9 inert atmospheric gasses used as packaging
10 aids, or carbon dioxide, I might add, ozone,
11 which are already approved, should affect the
12 use of the 100 percent organic label on a
13 product. However, it may not be wise to
14 require that substances used to meet food
15 safety requirements affect the 100 percent
16 organic claim. Diatomaceous earth is the
17 primary product available to organic farmers
18 for stored grain pest control. We request
19 NOSB obtain additional information concerning
20 the impact of such a change before making this
21 recommendation. And as before, please note
22 our written comments about this.

1 And on seed commercial
2 availability guidance, more on the written
3 comments, we suggest that the rest of the
4 provisions of 205.204(a) be given similar
5 attention, mainly the requirement for use of
6 organically-produced perennial planting stock.

7 On biodiversity, we welcome
8 attention to the principle of biodiversity in
9 organic agriculture, and we agree that the
10 implementation of this requirement should be
11 strengthened, though we'll be cautious about
12 imposing additional record-keeping burdens,
13 and would urge identifying outcomes to be
14 monitored in the organic system plan rather
15 than through prescriptive practice standards.

16 On aquaculture, for fish feed,
17 we're concerned about the 25 percent maximum
18 of fish meal and fish oil from wild caught
19 fish and other wild aquatic animals for the
20 first five years, because it's unclear how the
21 nutritional needs of aquatic species can be
22 met from other sources. Until there's an

1 organic aquaculture industry to provide such
2 byproducts, and since the Aquaculture Working
3 Group has determined that terrestrial
4 livestock byproducts cannot be used, this will
5 be a serious stumbling block for organic
6 aquaculture development. Use of wild fish
7 byproducts is ecologically desirable, given
8 the stringent monitoring and quality control
9 requirements identified in this
10 recommendation. We would suggest allowing a
11 larger percentage of fish meal and fish oil to
12 be derived from sustainably harvested wild
13 caught sources, with a proportional stepwise
14 reduction as an organic aquaculture industry
15 becomes established.

16 On net pens, the requirement in
17 255G to minimize adverse environmental impacts
18 from aquaculture production is essential.
19 However, we believe that the performance
20 target specified in (g)(i), of recycling a
21 minimum of 50 percent of all nutrients is not
22 feasible. Fifty percent is a laudable goal,

1 but accurate measurement is problematic. NOSB
2 should instead propose measuring a simulative
3 capacity by carbon deposits, benthic
4 organisms, and other types of benthic
5 analyses, rather than simply requiring
6 retrieval of 50 percent of all output until a
7 methodology is available for verifying such
8 target.

9 On pet food standards, we support
10 the proposal, given some important adjustments
11 which are included in our written comments.
12 And on other issues, we've convened a task
13 force on nanotechnology, and hope to have
14 information concerning the applicability of
15 that technology to organic production for
16 later discussion. Thank you.

17 CHAIRPERSON DELGADO: Questions?
18 Thank you, Tom. Moving on with Ed Maltby,
19 followed by Dave Engel.

20 MR. MALTBY: Good afternoon. I am
21 Ed Maltby. I directly represent over 180
22 producers -- organic dairy producers in the

1 east from Louisiana to Maine, and can speak on
2 behalf of another 500 organic dairy producers
3 across the country in the Federation of
4 Organic Dairy Farmers or Food Farmers
5 Coalition.

6 I'd like to thank the NOP, and
7 especially Rick and Barbara for the work
8 they've done in getting the access to pasture
9 rule out. It's been a long time coming, but
10 we're very grateful to have it, and we thank
11 you for your work.

12 We were going to have a parade of
13 cows coming through here, but the fish people
14 beat us to it. And then we thought of
15 ruminating cows, but the hotel wasn't too good
16 about cleaning up the mess, so we didn't
17 bother with ruminating cows.

18 We would also like to thank the
19 NOP for holding the listening sessions, one
20 that has happened, and the other two which are
21 due to happen very shortly I understand in
22 early December. It was a great opportunity

1 for producers to actually talk directly to NOP
2 personnel, and rather than them being some
3 evil bureaucrats sitting in the middle of
4 D.C., they actually realized they were human
5 beings struggling to do the right thing.

6 The organic community is being
7 energized with the release of the access to
8 pasture rule. And on behalf of over 1300
9 organic dairy producers across the country,
10 and many other people that have been
11 participating in the task force, for want of
12 a better word, I want to clearly state that we
13 do not not need an extension. We are
14 energized. We've had conference calls across
15 the country from farmers, and producers, and
16 interested consumers. They're so dedicated
17 that we start at 8:30 at night Eastern time,
18 and we pick up the Western producers as we go
19 later, and at least most of the farmers now
20 have learned how to click on the mute button,
21 so as they drop off to sleep, we don't need to
22 have to connect them. Now that's been

1 happening for the last, ever since the rule
2 came out, and we are energized and ready to
3 move forward taking part in the OTA task
4 force, and working with the International
5 Organic Coalition to come up with data,
6 comments, and constructive dialogue.

7 We're waiting now for the origin
8 of livestock, which we're glad to see is the
9 priority for 2009, and we urge the NOSB
10 Livestock Committee to work with us on some of
11 the recommendations so that we can come up
12 with a rule that meets the standards that we
13 are asking for.

14 And lastly, we strongly urge that
15 the NOSB or the NOP aggressively enforce the
16 current rules to the best of their ability.
17 It's great now that we've got five or six
18 dedicated enforcers. They're the people with
19 the baseball bats in the back of the room.
20 And it is critical to the integrity of the
21 label. We don't just need to write the rules,
22 we need to get them enforced, and we need to

1 be able to protect the future incomes of
2 family farmers across the country.

3 That's all. Thank you.

4 CHAIRPERSON DELGADO: Any
5 questions? Thank you. Next is Dave Engel,
6 followed by Will Fantle.

7 MR. ENGEL: My name is David
8 Engel. I am a dairy farmer from Wisconsin,
9 and contrary to the credit up there for Oregon
10 Tilth, I am an Oregon Tilth employee, but I'm
11 speaking with my dairy farmer hat on, and my
12 Executive Director of Natures International
13 Certification Services hat on. And I, too,
14 want to thank the Board and the public for
15 their interest in everything here. It is a
16 critical part of this community that we belong
17 to.

18 I have passed around my, which
19 will be my submitted comments, more or less,
20 for pasture. I don't want to dwell on them
21 too much here. I do want to offer the
22 perspective, though, as I have in the past

1 since this discussion began, that not all the
2 dairy farmers are being represented by the
3 1300 that Ed has proffered. There's been,
4 there are many -- Hugh mentioned one segment
5 of people that are not online, and the extent
6 that this proposed rule goes to is going to
7 throw many more people into that pot of people
8 that will not be able to comply.

9 You can look at my comments. You
10 can find me and talk with me later if you'd
11 like to know more.

12 The second thing that I would like
13 to briefly share with you, and is somewhat in
14 a way a reflection of this proposed pasture
15 rule, your proposal on the commercial
16 availability of seeds I think is good in its
17 intent, but it's very critical, just like with
18 the pasture rule, that we not put numbers in
19 the rule that set lines in the sand then that
20 have to be met or something happens.

21 I appreciated Miles' comments on
22 the commercial availability of seeds. I think

1 he's correct in looking at the different
2 segments. Another segment that I would add
3 into that would be what I would call the
4 commodity seed, the corn, beans, alfalfa.
5 These people could be buying more organic
6 seed. And as a certifier, personally, and as
7 an inspector, I make a specific point of
8 applying the rule, the 205.204 and the 205.2
9 commercially available definition. These
10 things have to be gone into with each grower.
11 It ends up on my exit interview with them.
12 And then next year, there's accountability,
13 and there's improvement. That's the purpose
14 of this rule, and it's a golden shining star
15 that we cannot lose sight of, or else we're
16 going to, in five years, may I say it, like
17 the banking industry, if we do certain things
18 now, there's going to be repercussions later.
19 So I won't say anything more about that.

20 The only other thing I'd like to
21 briefly share with you concerns Barbara's very
22 nice announcement this morning about training.

1 Again, I can see the progression here is,
2 first of all, we have an AMS training center
3 that is expert in training, putting materials
4 together. And then we have the NOP, who is
5 authorizing this, and they're expert in
6 providing oversight and management. It's
7 their responsibility.

8 My only concern is the expertise
9 that goes into the content of the training.
10 And the training is going to be on the rule,
11 the content of the rule, and the experts in
12 that area are certifiers, of course, the ACA.
13 I've also thought that the USDA is supporting
14 an eOrganic program that Mr. Riddle is a part
15 of, and they have a wide range of resources
16 there that could be accessed.

17 I think it's real critical,
18 though, that the content has expertise going
19 into it, just as the module of training
20 itself, the infrastructure for training, and
21 the program that's authorizing this, they have
22 their expertise. But the content or the

1 training for that, of the content for that
2 training needs to be accessed appropriately,
3 too. Thank you.

4 CHAIRPERSON DELGADO: Questions?
5 Hugh?

6 MR. KARREMAN: Thanks, Dave. I'm
7 just wondering, when you're saying there
8 shouldn't be specific numbers in whatever, I
9 guess seed availability or the pasture rule,
10 how exactly -- well, and you know, someone
11 mentioned earlier that the vast majority of
12 organic farmers really truly are farming as
13 the intent of the rule is laid out, but then
14 I've also heard that there's all these people
15 kind of at the margin probing where the
16 weaknesses are.

17 So if you don't have some specific
18 numbers, how is a certifier going to be backed
19 up by, let's say, the NOP if something goes to
20 court that someone has, you know, done
21 something or not if you don't have some kind
22 of numbers? I don't know. It's just a

1 question I have in general. I mean, what --

2 MR. ENGEL: Hugh, I know that's a
3 question, and I guess a couple of responses
4 would be, number one, the problem is a
5 political problem, and I think the enforcement
6 and the accreditation process should be taking
7 care of this. It takes care of many other
8 aspects of -- I mean, I was just visited. I
9 got a whole list of things as a certifier that
10 I'm supposed to be doing that they figured
11 that I wasn't doing properly. I accept that.
12 Why wasn't, for the individual certifiers that
13 were at that point at that time with those
14 herds, why wasn't this identified there?

15 The other thing that I will say as
16 a certifier, and this is anecdotal, I have a
17 very large herd, NICS has a very large herd
18 that's coming through the process, and they
19 haven't been, with their previous certifier,
20 being held to a stronger continual
21 improvement. This gentleman is putting in
22 place now, since I was there last year, a

1 \$100,000 bridge that he will be able to get
2 his cows to the other side of this thing that
3 he's been using as an excuse. He'll have
4 access to 200 more acres.

5 Now, he still will not be able to
6 meet that 30 percent, but that's a continual
7 improvement that he's put in place. And I
8 don't think, my concern is that, with numbers
9 in the rule, you're going to be disconnecting
10 that producer and many smaller ones,
11 particularly with the extent of the
12 specificity that this proposed pasture rule
13 proposes.

14 CHAIRPERSON DELGADO: Any other
15 questions? Thank you. Next we have Will
16 Fantle, followed by Alexis Baden-Mayer.

17 MR. FANTLE: Good afternoon. My
18 name is Will Fantle. I'm the Co-Director of
19 the Cornucopia Institute. Our organization
20 has about 2500 members. A vast majority of
21 those members are organic farmers.

22 I have a couple of areas that I

1 want to comment on today. I'm actually not
2 talking about the pasture rule at this point,
3 but I'm going to talk about lecithin
4 initially, and I understand that there's a
5 petition before the NOP and the NOSB to remove
6 lecithin from the National List. This is
7 something that we support. We sent out a
8 letter to Board members a couple of weeks ago.
9 I won't bother to read from that letter, but
10 I will highlight a couple of the points in it
11 which I think are pertinent to this
12 discussion.

13 First, we believe there is a
14 supply of organic lecithin, a significant
15 supply that can be offered to producers who
16 want to use organic lecithin in their product.
17 Second, by promoting the use of organic
18 lecithin, you are removing from the pipeline
19 a hexane extracted ingredient, something that
20 is very important to getting hexane out of our
21 products that are used in organics.

22 Third, we believe this will level

1 the playing field. We believe that organic
2 lecithin may be perhaps more expensive, and we
3 don't want users of organic lecithin to be
4 penalized for doing the right thing. It's
5 important that the playing field be leveled so
6 that commercial entities are playing together
7 in a fair manner.

8 Finally, I would say that this
9 will send a strong and positive message to the
10 commercial community that products can be
11 developed that are organic, and I encourage
12 you to look at this closely, and I hope rise
13 to the challenge more quickly than what you've
14 done with the yeast issue.

15 Second area I want to talk about
16 is organic almonds. When I was last here a
17 year ago, I raised with the NOSB and the NOP
18 the rather draconian mandate that had been
19 imposed in California requiring the
20 pasteurization of all California raw almonds
21 sold in this country, sold as raw. We're now
22 a year into the implementation of that

1 measure, and as of yet, even though I
2 requested this a year ago, and saw nodding
3 heads from staff at the Program that they
4 would get a determination to us, we still
5 don't know whether or not one of the two
6 approved treatment alternatives, propylene
7 oxide, a toxic fumigant, is allowed in the
8 organic production for pasteurization. I
9 would still like an answer to that question
10 from staff at the NOP.

11 Let me talk a little bit about the
12 impact of this rule. We have since gone to
13 court. In September, we again filed, we
14 worked with farmers, since only farmers and
15 handlers are allowed to file a lawsuit
16 challenging this rule, we worked with farmers
17 to help them file a lawsuit seeking to
18 overturn this USDA mandate. We think it
19 stands a pretty good chance in court, but more
20 importantly, what the organic producers are
21 telling us, who had niche markets for raw
22 almonds in commercial entities around the

1 country, their markets have been destroyed.
2 They are going out of business. More than one
3 producer has told us that the organic sector
4 is being destroyed by this rule. I think
5 that's very important for the National Organic
6 Program and you as Board members to be aware
7 of, because there is going to be a cascade of
8 food safety measures coming down the pipeline
9 in the next few years, whether it's leafy
10 greens, whether it's beef, or whether it's
11 other fresh foods that we eat in the
12 marketplace, there's going to be increasingly
13 stringent requirements placed by the USDA, in
14 some cases the FDA, that are going to govern
15 our access to unadulterated raw foods.

16 It's very important that you get
17 out in front of this, because you were not in
18 front of this when it came to the almond
19 issue. And we think this is still something
20 that's very important that should be discussed
21 inside the agency.

22 With that, I'm going to conclude.

1 And if anybody has any questions, I welcome
2 those. If not, I have a proxy, and tomorrow
3 I will be talking a little bit about the
4 pasture issue.

5 CHAIRPERSON DELGADO: Questions?

6 Bea.

7 MS. JAMES: Could you explain a
8 little bit about why the pasteurization of
9 almonds has ruined sales for the organic
10 almond farmer?

11 MR. FANTLE: There is a glaring
12 and gigantic loophole in place that has made
13 a huge difference, and then there's also the
14 issue of consumer preference for an untreated
15 product. The loophole that's in place has
16 allowed a flood of imports coming into this
17 country of raw almonds that don't have to be
18 treated. So consumers in the marketplace are
19 choosing those untreated nuts. There are
20 large commercial entities that have switched
21 their product lines away from California
22 almonds, which I think everybody in the

1 industry recognizes is the gold standard. So
2 the import loophole, and then even with the
3 requirement in this country of the two
4 treatment options, steam heat or propylene
5 oxide, there are consumers that want an
6 untreated product, raw product, and that has
7 just made a huge difference.

8 I've talked with a number of, on
9 this lawsuit there's 18 plaintiffs right now.
10 A number of those are organic producers. Not
11 all of them, though, are organic. There are
12 raw conventional producers that are also being
13 impacted by this that have joined this
14 lawsuit. And the organic producers that I've
15 talked with, and conventional producers that
16 I've been talking to are telling me thousands
17 and tens of thousands of pounds are in cold
18 storage right now because they have no market
19 for our product, and we need to be in front of
20 this issue.

21 CHAIRPERSON DELGADO: Any other
22 questions? Okay. Thank you. Moving on then

1 to Alexis Baden-Mayer, and followed by Devlin
2 Reynolds.

3 MS. BADEN-MAYER: Hello. My name
4 is Alexis Baden-Mayer. I'm with the Organic
5 Consumers Association here in Washington, D.C.
6 I'd like to talk today about grower groups,
7 aquaculture, and the 100 percent organic
8 claim. First, I want to thank you all for
9 your hard work. I'm very encouraged by the
10 National Organic Program's several new hires
11 in compliance and enforcement, and the plans
12 to make tradings more accessible and
13 accessible to consumers. It's really great.

14 And I'm also very impressed by the
15 work of the Board. You all are very
16 productive. The grower group certification
17 document is much improved. This September, I
18 had the opportunity to go to Palestine to
19 visit the Palestinian Fair Trade Association's
20 certified organic olive oil production. It's
21 in the area around Jenin. I saw olive trees
22 that were a thousand years old, and I met

1 farmers whose families have literally been
2 there for about a thousand years making their
3 livings from those trees.

4 There are 1700 tiny family farms
5 in the cooperative, and they all share a
6 central processing facility. They're building
7 a new processing facility, and it's probably
8 the largest economic development project in
9 the West Bank right now.

10 In Palestine, and a lot of other
11 places in the global south, they're organic by
12 default. They just don't have the money to
13 take care of their crops the way that we would
14 in the west with industrial inputs. So by
15 banding together to share resources and access
16 international markets, they're finally able to
17 do things, or make it worthwhile to do things
18 like fertilize their crop and clear the lands
19 of trash. So in a place like Palestine, where
20 economic development and self-sufficiency
21 isn't just a path out of poverty but a path
22 towards peace, you can't overestimate the

1 potential impact of projects like this.

2 So I want to thank the committee
3 for their great work, and urge you all to
4 support the grower group certification
5 recommendation. But I did also listen to the
6 comments today of Miles McEvoy speaking for
7 the National Association of State Organic
8 Programs, and his comments recommending that
9 this be explicitly limiting multi-site
10 certification to producers, small holders, and
11 legal entities. Those are all good
12 suggestions, and I don't think they would
13 change the character of this recommendation at
14 all. I think the recommendation would
15 probably be applied in this way anyway, but
16 those are good recommendations to get in there
17 before you approve that.

18 I'd also like to talk about the
19 aquaculture standards. Organic consumers are
20 now 69 percent of the population. We're a
21 very diverse group of people, but we're
22 consistent in our reasons for buying organic.

1 Organic food is safer, is healthier, and is
2 more nutritious. The Organic Consumers
3 Association also wants to turn on people to
4 the bigger picture, and let people know that
5 it's not only that it's safer, healthier, and
6 more nutritious, but organic is also an
7 important part of being able to feed the
8 world, to turn back global warming, reduce
9 food-borne illnesses and diet-related
10 diseases, and ultimately, like I saw in
11 Palestine, to increase stability, economic
12 security, and peace in the world.

13 And in order to enlist organic
14 consumers in these larger causes, we have to
15 make sure that they continue to be true
16 believers in organic as the way. And you
17 know, there's a lot of green washing out
18 there. There are a lot of competing
19 marketplace claims. And the Organic Consumers
20 Association is not going to change and become
21 the Green Consumers Association, or the
22 Sustainable Consumers Association, because we

1 believe that organic is the gold standard.

2 And it's one thing for a group
3 like mine to say, go for organic plus, so
4 organic plus fair trade, organic plus local,
5 but it's very different if we were ever to
6 have to face a competing food standard that
7 actually guaranteed a higher quality of
8 safety, health, and nutrition. And that's
9 what I'm afraid about with the aquaculture
10 standard.

11 We've got the Marine Stewardship
12 Council certifications out there, and I really
13 wonder what the Monterey Bay Aquarium Seafood
14 Guide would say about organic certified salmon
15 that's farmed in the Atlantic in open net
16 pens. Are we going to create the first U.S.
17 food production system where organic
18 certification isn't the gold standard? Please
19 don't let that happen. My recommendation
20 would be to look at the fish that are already
21 certified by the Marine Stewardship Council as
22 sustainable, and give those organic

1 certification first. And then save the ones
2 that are on their bad list for later. There
3 may be a way to do that.

4 CHAIRPERSON DELGADO: Thank you.
5 Any questions? We now have Devlin Reynolds,
6 followed by Bob Smiley.

7 MR. REYNOLDS: Hi, thank you. My
8 name is Devlin Reynolds. I'm with Natural
9 Forces, and I'm here on behalf of the sorbitol
10 octanoate petition for the committee. I guess
11 I was told to tell a little bit about myself.
12 I grew up on a small farm in central Iowa, so
13 I guess I've been in agriculture since I was
14 born. And kind of what brought me here today
15 is some of us probably remember the FFA Creed,
16 and it's the first line, and that is, you
17 know, "I believe in the future of farming with
18 a faith born not of words but of deeds." And
19 my business, Natural Forces, is my deed.

20 And what we do in Natural Forces
21 is we go to farmers, producers, and we go to
22 them and say, look, tell us your problems, and

1 if you tell us what your problems are, if we
2 find a solution for it, will you buy it from
3 me? Pretty simple. And they go, of course,
4 solve our problems, we'll buy it from you.
5 Well, I guess it's a business model. Someone
6 told me last week it was, and that's how I got
7 to the sorbitol octanoate, the sugar ester
8 family.

9 And what I'd like to say is, the
10 sorbitol octanoate is compatible with the
11 organic agriculture, and clearly meets the
12 seven criteria for the addition on the
13 National List. Sorbitol octanoate is a soft
14 input. It does control soft-bodied insects,
15 and what's very good about it is it fits into
16 all of the IPM programs that I grew up around,
17 and what I learned, and it does fit a lot
18 better, I believe, and a lot of the other
19 growers believe, because it is, I don't want
20 to say safer, but easier on the environment
21 than some of the other standards that are in
22 there today.

1 And one point that I'd to make is,
2 it was stated in there that we have enough
3 products, that we don't want to just add
4 products just to add products. I work with
5 growers every day, and the one thing that I do
6 know is they have more problems. They have
7 problems everyday. There is a lot of people
8 who won't go to organic production because
9 they don't have the confidence that they can
10 have all the tools they need. One grower can
11 know how to use every tool that's out there
12 today to solve every problem. But quite
13 honestly, most of the producers that are out
14 there cannot. They don't. And so that's why
15 I state there are a lot of problems.

16 We don't know, and no one can
17 judge. We can all budget, we can all plan, we
18 can all do sterilization, cleaning, do
19 everything we can culturally to prevent pest
20 pressure. But what we can't do is we can't
21 budget or we can't plan for drought. We can't
22 plan for the next blue mold to come up in a

1 hurricane from the Caribbean. We can't plan
2 on a ship landing in the Great Lakes that has
3 an extra emerald ash borer. And that's why we
4 need to continue to have innovation, because
5 Mother Nature is going to continue to throw
6 problems at us.

7 And that's why I'd like to state,
8 you know, sorbitol octanoate is not the end of
9 all be all of anything. But what it is is a
10 product. It is a good tool that people can
11 use to solve problems that is as close to
12 benign as a lot of things that are out there
13 today.

14 The other point is, quite
15 honestly, I do have one product that is a
16 sister product to sugar ester, it's sucrose
17 octanoate, which is on the list. And it has
18 been brought up that, hey, these products are
19 the same. Why would you allow one in, and why
20 would you need the second one? Well, it's
21 kind of like my sister and I. We're from the
22 same family, but we're not the same. She's

1 better at some things, I'm better at another.
2 She wouldn't agree with me, but she thinks she
3 can do it all.

4 And one example of that, I would
5 say, is mealy bugs. Now to anybody in this
6 room, you're like, a, what is a mealy bug,
7 and, b, who cares? Well, if you have a mealy
8 bug problem, you care. Sorbitol octanoate is
9 much better on mealy bugs than sucrose
10 octanoate. And on a flip side of the coin, if
11 you are a small producer, and where you do 90
12 percent of your applications with a one-gallon
13 pump-up sprayer, you want to use sucrose
14 octanoate. It's a better product because it
15 goes in suspension better. These are two very
16 simple things that might not seem like
17 anything to you guys in here, but to those two
18 people, one that has the mealy bugs, and one
19 that has a one-gallon pump-up sprayer, it's a
20 big difference.

21 So we can't just solve one problem
22 with one product. And what was crazy to me

1 was the discrepancy between the review
2 recommendation in sucrose octanoate ester and
3 sorbitol octanoate. And so all I ask you is,
4 please look at my letter. And I know you see
5 thousands of letters that are in there. What
6 I would ask is if you'd please take time to
7 look at it and read the points that I've made.

8 And the last thing I'd like to say
9 is on innovation. You know, you've got
10 several of the letters that are out there.
11 We're so happy we have people like you in here
12 today. You know, we're not Dow, we're not
13 DuPont, we're not those guys. We focus on
14 people that have problems. And Perol Farms is
15 one of them that came to us and said, look, we
16 need more products like sorbitol octanoate,
17 because we have terrible mite problems. We
18 can plan, we can budget, we do everything, but
19 we need more products. And if the committee
20 comes back and says, we have all the solutions
21 to the problems, people like us, who are
22 bringing small products to big problems aren't

1 going to be coming here anymore.

2 So what I'd like to say is, I
3 thank you very much for your time, and I'll
4 entertain any questions or comments.

5 CHAIRPERSON DELGADO: Any
6 questions? Thank you very much. Let's move
7 on then to Bob Smiley, followed by Taw
8 Richardson.

9 MS. SMILEY: I'm actually not Bob
10 Smiley. I'm Joan Smiley. My father is not
11 well today, so I am here on his behalf.
12 First, I want to introduce my co-presenter and
13 long-time consultant and colleague, Professor
14 Emeritus of wheat science from University of
15 Maryland, Dr. Ed Bestie. So he's going to
16 support me on some of the technical things.

17 Before I get started, I just want
18 to thank the Board for your commitment, your
19 hard work, your contributions as stewards of
20 the industry but, more importantly, as
21 decision-makers of the industry so that you
22 can ensure the progress. Nothing in this

1 world stays static, so you, as stewards,
2 making decisions, making sure the standards
3 are held but also that we make progress is
4 really very valuable and I thank you for that.

5 I'm going to stay within my time
6 frame so we can flip pretty fast. So I'd like
7 to petition on ammonium nonanoate as an
8 organic herbicide. The outline for what I
9 want to share today is just ammonium nonanoate
10 as a distinction and also the organic
11 discussion distinctions of natural, organic,
12 and synthetic and how those might overlap or
13 coincide with the realm of synthetic and the
14 organic domain rules are and the rationale to
15 allow the substance for food use as organic.

16 So the request is that our initial
17 petition for ammonium salts or fatty acids be
18 changed to just ammonium nonanoate, and the
19 rationale for that is ammonium nonanoate is
20 just one substance of many considered by the
21 EPA to be a single substance known as ammonium
22 salts or fatty acids. And of these many

1 substances, ammonium nonanoate is the most
2 effective as an herbicide and is also most
3 abundantly found in nature.

4 Ammonium nonanoate is continuously
5 produced in nature by the combination of
6 ammonia in the air or in the soil with
7 nonanoic acid, which is in nature in many
8 different ways. And I'll share a few points.

9 Ammonia is given off by all animal
10 waste. Most of us know that. It is a part of
11 the natural nitrogen cycle, and it's in both
12 our air and our soil at certain parts. That
13 is one component of the substance. Nonanoic
14 acid is found in nature in many different
15 ways, and I realize this is kind of a tough
16 slide to read, so I'll just make a few points.
17 Nonanoic acid is given off by green plant
18 leaves. It's in virtually all human diets.
19 It's given off by kiwi fruit, frying
20 hamburger. It's been found in many cities'
21 drinking waters, as well as many geographies'
22 rain water. It's been found in the air all

1 over the world in different studies, so it's
2 all around us all the time.

3 So you might ask the question if
4 it's all around us all the time and it's
5 continuously produced in the environment, what
6 would have it be natural versus synthetic?
7 Well, the definition of synthetic is that it
8 would need to be produced. It's in the
9 environment all the time, but it biodegrades
10 in less than 24 hours. So it never collects
11 in any kind of harvestable quantity so,
12 therefore, suggests that it could and should
13 be made still for organic use.

14 So how it's made. It's made
15 exactly the same way it is in nature. It can
16 be made in a coffee cup, a steel drum, any
17 kind of container at room temperature with
18 adequate ventilation just because of the give-
19 off of the ammonia. And it comes together in
20 a solution in water, and it forms
21 instantaneously with no added energy. And
22 that's exactly the same way that it's made in

1 nature. And if it were not biodegraded in 24
2 hours, it would be harvestable and we wouldn't
3 be having this conversation probably.

4 So the food use compatibility.
5 Ammonium nonanoate is a soap. Soaps are
6 granted tolerance exemptions with minimal risk
7 of active and inert ingredients. And the
8 product that Falcon Lab has a patent on with
9 ammonium nonanoate, there are no other
10 ingredients in the product besides ammonium
11 nonanoate and water. So it's very simply
12 produced, and it's very pure in its
13 substantive form. And, in fact, the EPA said
14 that if there were residue found on food
15 crops, ammonium nonanoate residue found on
16 food crops, it would be undetectable, whether
17 those were placed by human action or found
18 there naturally just in natural residue as
19 it's on the plant.

20 I'll skip over a couple of next
21 slides, but the point I want to make is that
22 the Senate did allow this group as decision-

1 makers to make decisions on synthetic products
2 if they also met other organic standards. And
3 I just appeal to you to be that decision-
4 maker.

5 There was a preamble in the set up
6 of the organic certification program to allow
7 for synthetic exemptions. And one of those
8 exceptions is in the category of soaps.

9 Ammonium nonanoate is a soap, and soap is any
10 salt of an edible acid and the human fatty
11 acids consumption is 100 times higher than
12 exposure to any other kind of soap or
13 household cleaning products or in the
14 environment. So what we might initially think
15 of as soap we're actually ingesting everyday.

16 And as far as synthetic
17 substances, allow for organic crop production
18 from the EPA standards. EPA list four, which
19 is in our submittable concern, are allowed on
20 food use as pesticide products, and ammonium
21 salts of C8 to C18 are on list 4A and the
22 product ammonium nonanoate is, in fact, listed

1 for organic production with EPA.

2 So the difference that this would
3 make for organic agriculture, weed control is
4 the biggest challenge of all organic farmers.
5 It's both an efficacy problem, as well as an
6 economic problem. They're just looking for
7 other ways to do this. We realize that there
8 are alternatives, such as acetic acid or clove
9 oil. Nonanoic acid can be used on a farm at
10 one-fifth to one-third of the price of any of
11 these other products with higher efficacy.
12 And, in fact, USDA has funded tests on
13 nonanoic acid for three straight years against
14 acetic acid and clove oil. So at least part
15 of the USDA is really trying to forward motion
16 on this substance.

17 CHAIRPERSON DELGADO: Thank you.
18 Any questions? Kevin?

19 MR. ENGELBERT: Would you quickly
20 review the beginning of your presentation
21 about requesting a name change from ammonia
22 salts and fatty acid to ammonium nonanoates

1 and what the difference is between the two?

2 MS. SMILEY: Sure. Our initial
3 petition was for ammonium salts and fatty
4 acids, but ammonium nonanoate, which is the
5 distinct substance in our product, is one of
6 many in the EPA category called ammonium salts
7 or fatty acids. And in thinking through the
8 decision responsibility of this group, rather
9 than, you know, having a decision based on the
10 burden of all of the inclusive items in
11 ammonium salts of fatty acids, we decided to
12 make a distinction and make a request that the
13 consideration just be given to ammonium
14 nonanoate.

15 CHAIRPERSON DELGADO: Any other
16 questions?

17 MS. SMILEY: Did I answer your
18 question?

19 MR. BESTIE: I think we should
20 mention it is a contact herbicide, and we
21 think it's very effective for what the organic
22 farmers need. We do have it under review as

1 a 5th or 25B list, and we expect EPA to
2 respond to that petition very soon. Ed
3 Bestie.

4 CHAIRPERSON DELGADO: Thank you
5 for that. No more questions from the Board?
6 Julie?

7 MS. WEISMAN: I was just wondering
8 if you could speak to the other items in that
9 group that you are now trying to separate the
10 ammonium nonanoate from. Are those other
11 items you think would be not as
12 environmentally friendly, not as acceptable or
13 compatible with organic principles?

14 MR. BESTIE: I don't think there's
15 much difference environmentally as far as the
16 risk. The C9 carbons in the nonanoic acid
17 molecule is the most active on green tissue,
18 and it's the most active material to kill the
19 weeds as a directed spray.

20 MS. WEISMAN: So because this is
21 the most efficacious of those in the group,
22 rather than that other things in the group are

1 less benign?

2 MR. BESTIE: Yes. Well, the C8,
3 9, and 10 molecules have been shown that they
4 primarily have only high-toxicity response on
5 green plants, so the C9 is the most active,
6 and that's why we've chosen to use that in
7 this product.

8 CHAIRPERSON DELGADO: Jerry?

9 MR. DAVIS: Could you clarify that
10 little bit? From the petitioner's public
11 comments, they've mentioned that there is
12 approximately 13 materials listed by EPA that
13 would all classify as ammonium salts or fatty
14 acids and only three of them are herbicides.
15 The rest are not biologically active to behave
16 the same way.

17 So it seems valid what they're
18 asking, to me. It could be more specific. It
19 would have to have a specific CAS number
20 anyway, and we didn't have that information
21 readily at hand when we wrote up the initial
22 recommendation, which is now two years old,

1 and just kind of edited and brought back up
2 again here.

3 CHAIRPERSON DELGADO: Any other
4 questions? Bea, followed by Kevin. Go ahead.
5 Bea?

6 MS. JAMES: You went through your
7 presentation pretty quickly, and I didn't
8 quite, I started to read an area where you
9 were talking about, there was something in
10 there about the potential risks, environmental
11 or health. Can you address that? Are there
12 any --

13 MS. SMILEY: I don't know that
14 there's anything in here about environmental
15 risks or health.

16 CHAIRPERSON DELGADO: Kevin, do
17 you want to follow-up with that?

18 MR. ENGELBERT: You mentioned that
19 there's no detection differences whether it's
20 naturally-occurring or whether it's been
21 applied. But when is it applied relative to
22 harvest? And if you do apply it, wouldn't

1 that increase the likelihood that it would be
2 detected upon a product?

3 MR. BESTIE: Well, since it's not
4 sprayed on the crop, it should not actually
5 show up in the product that's harvested. Your
6 other question about the risk in the
7 environment, it is toxic to aquatic life. But
8 at the same time, it forms in insoluble
9 material with calcium and magnesium. So that
10 immediately inactivates the molecule as far as
11 the biological activity in water, and we're
12 recommending not to apply it in areas near
13 water. We don't think it would ever end up in
14 the water streams or ditches.

15 MR. ENGELBERT: So is there any
16 chance of the breakdown products accumulating
17 in the soil?

18 MS. SMILEY: It bio-degrades in 24
19 hours.

20 MR. BESTIE: It degrades to carbon
21 dioxide. It's metabolized by the organisms in
22 the soil.

1 MS. SMILEY: There's no migration
2 in the soil at all.

3 CHAIRPERSON DELGADO: Any other
4 questions? Okay. Thank you very much.
5 Moving on, we have next Taw Richardson,
6 followed by Bill Wolf.

7 MR. RICHARDSON: Good afternoon.
8 I'm Taw Richardson with Agrosource, and I
9 appreciate the time of the Board and the NOP
10 to discuss a petition that we've lodged
11 related to the entry for tetracycline and
12 amendment to that entry. So if we can proceed
13 on with slide two.

14 A general outline of the comments
15 that we have and to the core of what we're
16 asking, the petition that we have is for
17 clarification by amendment of the tetracycline
18 entry to the National List through one of two
19 ways. Currently, it's listed as tetracycline
20 (oxytetracycline calcium complex). We would
21 like to see removal of the parenthetical or,
22 in turn, inclusion of oxytetracycline

1 hydrochloride within the parenthetical.

2 Other elements relevant to this
3 are: the equivalence of the two materials, the
4 hydrochloride and calcium, the fact that there
5 will be no increase in use of antibiotics by
6 this action, and that the clarification will
7 result in fair treatment for our product
8 within the market.

9 As you well know, the Sunset
10 Review by the NOSB to the NOP was to accept
11 renewal and was done back in June of 2006.
12 And our point is that both oxytetracycline
13 hydrochloride and calcium are both
14 tetracycline. And so this petition just seeks
15 to clarify that by amendment.

16 And further to that, there's no
17 addition of use or product by this action.
18 And per the feedback that we received from the
19 Board back in May, we've removed peaches and
20 nectarines, which would have been a new use,
21 from the petition we have with you.

22 The basis for this clarification

1 in a little more detail, as I touched on
2 earlier with both of these forms,
3 hydrochloride and calcium, are considered
4 equivalent materials. That's unambiguously
5 documented in EPA's pre-registration
6 eligibility document from 1993 and their
7 tolerance re-registration eligibility document
8 from 2006. And they make no regulatory
9 distinction at all between oxytetracycline
10 hydrochloride or calcium. And then, also, the
11 NOSB itself, within it's TEP, recognizes
12 oxytetracycline as an inclusive category for
13 these things and also recognizes EPA's
14 position of interchangeability and
15 equivalence.

16 Also, there are many entries in
17 the National List that do not specify a salt
18 form. The closest most related to this would
19 be streptomycin, and the National List does
20 not specify a salt, so under that you could
21 use streptomycin base, streptomycin sulfate,
22 streptomycin nitrate, and there's no

1 distinction made.

2 Also, the issues that have been
3 raised by the NOSB related to the use or the
4 issues with the hydrochloride, they also,
5 based on equivalence, would also relate
6 directly to oxytetracycline calcium. So we
7 believe that that equivalence also addresses
8 all those issues that have been raised.

9 If we do get the approval of
10 petition, we do think it will do several
11 things. One, it will address the favoring of
12 one equivalent commercial product over another
13 and, secondly, allow for appropriate free
14 trade with these products in organic and non-
15 organic crop farming. There are two things
16 that are relevant to that. One is with just
17 distribution. Distributors will want to carry
18 one product. If there's an organic
19 designation for one and it doesn't have it for
20 another, they're going to choose the one that
21 has that designation. So that's a serious
22 competitive disadvantage for us with an

1 equivalent product to them. And, secondly,
2 the same thing with farmers. When they grow
3 both organic and non-organic palm fruit they
4 don't want to carry two products, one for
5 each. They want to have one product in the
6 barn that they use. So those are serious
7 issues for us just to be able to compete
8 fairly in the marketplace.

9 And then, finally, in this area,
10 it will not increase the use of tetracycline
11 in organic or, for that matter, non-organic
12 palm fruit farming. There's basically, each
13 year, going to be a certain size pie. It's
14 all a matter of how that pie gets divided up,
15 whether we're able to really participate
16 effectively within that or whether we're
17 precluded from doing that.

18 Next slide, please. And, in
19 conclusion, a clarification via amendment to
20 the National List is warranted in our opinion.
21 Tetracycline has an entry on the National List
22 via the Sunset Review. These are equivalent

1 tetracycline materials for regulatory purposes
2 for EPA and for NOSB. There are direct
3 examples of other National List entries that
4 make no arbitrary distinctions between salts,
5 and issues raised by NOSB apply to both
6 oxytetracycline hydrochloride and to calcium.

7 This action will not increase the
8 use of oxytetracycline in any markets and just
9 allow for normal competition to occur. An
10 amendment ensures a time line consistent with
11 current sunset in 2012. So we would not be on
12 a new time line. We're on that tetracycline
13 time line, and the decision is made
14 accordingly.

15 A clarification will allow free
16 trade and create a level playing field for
17 Agrosource, which is what we ask for. And
18 approval of tetracycline to the National List,
19 along with these facts presented, we believe
20 warrant this clarification and amendment.

21 And just to address it on a more
22 fundamental basis, we agree with the decision

1 that the Board made in 2006 after sunset,
2 because we know what growers need and we know
3 how devastating a disease this is for growers,
4 and that's our primary focus in the things we
5 do. But also we understand what you're
6 confronted with. We can read the tea leaves,
7 organic growers can read them, non-organic
8 growers can read them. You go into the
9 supermarket and people see chicken antibiotic-
10 free; they see these things. And so all of us
11 have to look at that and project what is going
12 to occur in the future and how we react to
13 that.

14 But, today, tetracycline is
15 approved for use on palm fruit, and we're just
16 asking that we be given that same
17 consideration. Thank you.

18 CHAIRPERSON DELGADO: Any
19 questions? Jerry?

20 MR. DAVIS: Given that the organic
21 pear and apple usage of antibiotics in general
22 is pretty small compared to the conventional

1 market, the amount that is applied to
2 conventional fruit, from a marketing
3 standpoint, if streptomycin and tetracycline
4 came off the approved organic list and were no
5 longer available, that would probably be just
6 as helpful to you, wouldn't it? Because you
7 would no longer have that marketing impediment
8 of the competing product that has the organic
9 designation that yours currently does not.

10 MR. RICHARDSON: I'll say two
11 things for that. One, I know you're aware how
12 devastating a disease this is, so we want to
13 be very clear that we're very concerned about
14 growers. And we know that in certain
15 circumstances, these are the only things that
16 will keep them from having their orchard look
17 like it's been hit by a flamethrower. So we
18 know that.

19 But that being said, for us
20 personally, yes. We're being hurt more by the
21 fact that it's under the organic approval than
22 we are if it were not because we're being

1 precluded from the bigger portion of the
2 market by our competitor raising the fact that
3 we don't have approval from the Board.

4 CHAIRPERSON DELGADO: Hugh?

5 MR. KARREMAN: I agree with the
6 rationale on what you're saying up there, and
7 I think you understand our predicament here at
8 this level. But when it came up for sunset,
9 you do realize it was a very split vote on
10 that. It wasn't like a unanimous type thing.
11 And I guess, you know, to do so little -- I
12 guess I'll just stop there to save time. But
13 I agree with what Jerry was saying
14 essentially, after what I just mentioned.

15 CHAIRPERSON DELGADO: Any other
16 questions? Bea?

17 MS. JAMES: Towards the end, you
18 stated the real core issue is that
19 tetracycline is seen as an antibiotic, and
20 consumers don't associate that with organic
21 products. So for somebody who is in retail,
22 if consumers were educated that this was being

1 applied, how would you go about giving me
2 advice, as a retailer, that this application
3 is somehow different than antibiotics being
4 restricted in other areas?

5 MR. RICHARDSON: Well, I don't
6 think I would try to get into a strong defense
7 position of these from an organic standpoint.
8 I think that's why there's so much conflict
9 within the Board on how to deal with this and
10 why animal producers say we're not using,
11 we're not going to use this where a crop
12 producer is using it, why these arguments
13 arise. But, you know, it's a semi-synthetic
14 original, originally coming from a bacterium,
15 so it's naturally derived and it's altered for
16 handling. And that's the fundamentals, but
17 the desire, because of the broader issues
18 related to antibiotics in the entire food
19 chain and the implications to human health and
20 the prevailing attitudes that people have
21 about antibiotics, I don't think we would have
22 an easy time.

1 MS. JAMES: Yes. Just, you know,
2 in comment to that, I have to say that it's
3 hard enough to educate people about organic
4 and the different tiers, let alone when
5 consumers who are more educated and
6 knowledgeable find out about things like this.
7 It makes it very difficult to try to say that
8 the organic seal really means what we say it's
9 supposed to mean.

10 MR. RICHARDSON: And that's why
11 our petition is for an amendment to an
12 existing use. Whether we are applying our
13 product or not is not changing the fact that
14 tetracycline is being used on palm fruit.
15 It's just keeping us from being able to
16 compete in the marketplace and sell our
17 product, not only in organic but broadly
18 within the market. That is really the
19 fundamental issue for us. We're not wanting
20 to get into a judgment about making this
21 decision today because it's not appropriate;
22 it's a Sunset issue or a special issue for the

1 Board to address.

2 CHAIRPERSON DELGADO: Kevin,
3 followed by Dan and then Hugh.

4 MR. ENGELBERT: Have you seen any
5 resistance in the growers that are using your
6 competitor's product to the disease that it's
7 controlling? And do you think that adding
8 this additional product will -- I know you say
9 there's not going to be any more use of
10 tetracycline altogether. But adding another
11 product, will that increase or decrease the
12 likelihood that this disease is going to
13 develop resistance to it and increase or
14 decrease the likelihood that a more suitable
15 product would be developed?

16 MR. RICHARDSON: It would be
17 neutral, in my opinion, and we've looked at
18 this very, very carefully. There's about a
19 25-year history now, and a lot of
20 investigation on the part of researchers
21 independent of us that have done this work in
22 Washington State University and in California

1 and the like. Particularly in the Pacific
2 Northwest, they've looked at this very closely
3 and they don't see evidence of shifts in
4 populations related to tetracycline. So that,
5 we don't believe, is an issue. And because
6 there will be no more used one way or another,
7 we believe it's a neutral issue.

8 And your second question, I'm
9 sorry, was?

10 MR. ENGELBERT: Would approval of
11 this substance increase or decrease the
12 likelihood that a substance that's more
13 compatible with organic farming, that is it's
14 not an antibiotic, be developed to control
15 these?

16 MR. RICHARDSON: And that I can
17 address very definitively, as well. We look
18 all the time for replacements for these
19 products because we recognize the trends that
20 are occurring. Just exactly what we're
21 talking about today is what is perfectly
22 germane to us as we look forward and what we

1 can expect from these products in the future,
2 how they might be used or might not be used.
3 So we're constantly looking, not only because
4 of issues related to use of antibiotics but
5 also because of issues having the breadth of
6 products that are acceptable to growers and
7 consumers.

8 I was on the phone yesterday on
9 the train down here after reading a paper from
10 an international symposium combing through,
11 looking for anything that someone might have
12 identified that would be useful and more
13 benign in the eyes of consumers for this
14 purpose. But that's a very, that's been a
15 very tough nut to crack.

16 CHAIRPERSON DELGADO: Hugh,
17 followed by Dan.

18 MR. KARREMAN: I guess part of
19 your rationale was you're getting squeezed out
20 of the conventional industry because people
21 that use maybe organic version of, you know,
22 the tetracycline, if it's allowed for organic,

1 will not buy your product, so they'll just buy
2 the other company's product. And I feel like
3 it's almost like the organic industry on that
4 point is being used just for conventional, for
5 selling in the conventional industry. That
6 doesn't sit too right with me.

7 MR. RICHARDSON: It's having that
8 impact on us, yes.

9 MR. KARREMAN: Well, I think it
10 would be, I mean, to me, clearly, I'm just
11 saying this petition to be off the list, and
12 I would think that would stimulate orchard
13 growers to come up with alternative ways to
14 treat this problem, whatever it is, just like
15 in the livestock industry with real, living,
16 breathing animals we've had to do the same
17 thing.

18 MR. RICHARDSON: I understand the
19 comment. The only caution that I would make
20 is we are a privately-held smaller company
21 relative to most crop protection companies,
22 and this is an area that we look at very

1 intensively. We have not been able to find
2 candidates even to look at that we thought
3 were going to be effective or that didn't have
4 some problem we didn't want to try to address
5 in a regulatory process. We do look because
6 we get very focused on this, whereas for major
7 companies this is really very small. But we
8 do comb, so it's not that easy to find
9 something to replace this as with other areas
10 of disease or insect or for weed control.

11 MR. KARREMAN: Neither is it with
12 livestock, but it's been getting done by
13 certain people in the industry. Now, it's
14 slow, but it can happen. And if it's still in
15 there, it may not. It kind of caps the
16 stimulus to do so.

17 CHAIRPERSON DELGADO: Dan?

18 MR. GIACOMINI: Well, I mean,
19 that's been across the board in the organic.
20 I mean, if there's an organic version, a
21 version useable in organic and not useable in
22 organic and you're a retailer supplier with

1 conventional and organic, you bring in the one
2 product that everybody can use. I mean,
3 that's pretty typical of the industry.

4 Not even so much for yourself,
5 but, Jerry, he's presenting here, essentially,
6 an annotation change. Your recommendation to
7 the Crops Committee is, in addition, a new
8 listing. Is there anything else that you need
9 to -- is there a consideration within Crops to
10 look at it that way or is there anything else
11 that you need to be able to do that?

12 MR. DAVIS: We discussed that
13 scenario of making an annotation change and
14 rejected it. And I can get into all that
15 reasoning tomorrow during the presentation.
16 I will be bringing up the ins and outs of what
17 we discussed. Rather than just cover one
18 small segment of it right now, I'd rather --

19 MR. GIACOMINI: Well, why we had
20 him. I didn't know what his schedule was, so
21 just whether you had, if that had been
22 considered.

1 MR. DAVIS: We considered it and
2 rejected it for various reasons. Mostly, it
3 centered around we don't want to send the
4 wrong signal to the consumers. We don't want
5 to jeopardize here the organic seal, and that
6 is the, I believe, in my opinion, the driving
7 force behind this whole decision-making is
8 this is a very threatening substance, it is
9 not accepted, it is hated, and we did not want
10 to take any action that would allow it to be
11 thrust into the media or anywhere saying,
12 well, look what the NOSB has done, in my
13 opinion. But, again, I really didn't want to
14 get into that right now.

15 MR. GIACOMINI: I just wondered
16 whether there was anything else you needed to
17 --

18 MR. DAVIS: No.

19 MR. GIACOMINI: -- look at that.

20 MR. DAVIS: No, we vetted all of
21 that.

22 MR. GIACOMINI: Good.

1 CHAIRPERSON DELGADO: Jennifer?

2 MS. HALL: I just have one quick
3 question. Is there any economic advantage
4 that your product would offer growers? Since
5 it seems like right now this is the only
6 effective item that treats this. Is there any
7 advantage in the competitive market, you know,
8 looking at kind of how economics works? If
9 there's options with your product being there,
10 would it have the effect of lowering price for
11 the input?

12 MR. RICHARDSON: I don't know that
13 I can make that statement. We went into this
14 business because there was a need for more
15 stable, better formulations, and we knew this
16 was a devastating disease and very much a
17 niche market that could have devastating
18 implications if the disease got out of hand,
19 which it does frequently. And so we developed
20 better formulations of the product that were
21 more stable and better served the market, we
22 felt, from that perspective. But we don't

1 think we could contend here, that it would be
2 fair to contend that we're going to make some
3 significant price reduction in the cost to
4 growers.

5 CHAIRPERSON DELGADO: Any other
6 questions? Okay. Thank you very much. Next
7 is Bill Wolf, followed by Jo Kraemer.

8 MR. WOLF: Thank you for this
9 opportunity. It's been many years since I've
10 addressed the National Organic Standards
11 Board. In fact, many of you I don't know.
12 I'm Bill Wolf, and I'm President of Wolf,
13 DiMatteo & Associates. I'm also an organic
14 farmer. In the past, I've participated in
15 many businesses and activities in the organic
16 field, including the manufacturing of organic
17 pest controls, the development of natural
18 fertilizers, acting as the President of OTA,
19 et cetera.

20 I've been very involved in
21 materials we've used and in helping to develop
22 some fundamentals. I'm going to talk very

1 briefly about the umbrella, starting with the
2 umbrella of continuous improvement and the
3 importance of continuous improvement from all
4 aspects of the regulations, especially
5 improving better farming, improving selection
6 of materials, and promoting organic
7 preference.

8 With only five minutes, I'm going
9 to jump straight to five requests that I urge
10 you to consider that's in the document that I
11 have shared with you and sent to the web.

12 One, I would like you to consider each new
13 proposed organic farming input on its merits
14 and their potential to provide growers with
15 innovative softer choices, not based on
16 numeric count on the current list. I'd like
17 you to take a look at the review process
18 that's now going on. I'm going to address
19 that in a little more detail today.

20 Two, I would encourage the support
21 of the development of organic ingredients and
22 applaud the fact that you've just received the

1 lecithin -- petition to remove lecithin from
2 605 and to remove liquid lecithin from 606.
3 Three, I applaud the Materials Working Group
4 proposal and suggest that either options three
5 or four make the most sense because the law
6 and the intent of organic was not to separate
7 out organic preference but to focus organic
8 preference exclusively on all materials that
9 are not organically produced now.

10 Four, I applaud the Joint Crops
11 and CAC Committee recommendation to encourage
12 the use of organic seeds. And I also approve
13 and believe that the 100-percent labeling
14 claim clarification from the CAC makes sense.

15 I'd like to drop back for a moment
16 to the Crops Committee work and focus on that
17 because that is an area I worked on for many
18 years. And I'm very concerned about a fairly
19 substantial policy shift that's occurred with
20 this meeting that I don't think people are
21 fully aware of. I believe it's a philosophy
22 change, and it is basically saying that if

1 there are already materials on the list that
2 serve to kill a given bug or control a given
3 problem, then we don't have to add any more
4 materials.

5 The NOSB itself has a policy board
6 manual that passed October 17, 2001 that
7 establishes criteria. The law establishes
8 criteria, and the regulations establish
9 criteria. The Federal Register established
10 the criteria for reviewing materials. And
11 those criteria are based on whether it's
12 compatible with organic production, whether
13 there's a need for it.

14 A quote from one of the
15 rejections, the reform crops materials
16 rejected by the Crops Committee in this round
17 and presented to this meeting. With all due
18 respect, I fundamentally disagree with the
19 principles behind those rejections. I'll
20 quote one of those. This material is not
21 essential to organic farming as there are,
22 quote, many alternative insect control methods

1 and materials already available. Adding
2 another synthetic material to the National
3 List in this case would be inconsistent with
4 the original intent of OFPA, which severely
5 limits the routine addition of exempted
6 synthetics. In the case of this specific
7 material, it's taken ten years for that
8 material to come forward to the point where
9 it's being considered at this Board meeting,
10 and I wouldn't call that a routine addition of
11 an exempted synthetic. So I respectfully
12 disagree and believe that you really need to
13 take a look at the original priorities.

14 I believe that this is a dangerous
15 shift in policy for a number of reasons. One,
16 I think it will reduce innovation. It will
17 reduce the development of research and
18 alternatives for farmers, and it would reduce
19 funding directed at organic farming.

20 I worked very hard for a number of
21 years to help create the first green bank in
22 America called New Resource Bank, and its

1 purpose is to help fund and develop programs
2 for organic and other green businesses. And
3 I know that the repercussions are already
4 occurring. People are going, whoa, I can't
5 head in that direction of helping to develop
6 products that would be used successfully in
7 organic farming, because, in fact, it's almost
8 impossible to get something through that
9 process.

10 So, in closing, my concern is that
11 I think you really need to take a look at what
12 message that sends because I believe that one
13 of our biggest priorities is to encourage
14 organic farming and the expansion of acreage,
15 and I think that this message does not do
16 that.

17 CHAIRPERSON DELGADO: Any
18 questions? Jerry?

19 MR. DAVIS: I'm trying to flesh
20 out your last statement a little bit. I'm
21 hearing that, in your opinion, the drift that
22 the current committee or Board as a whole has

1 taken of rejecting materials is fairly routine
2 and almost letting nothing past, your
3 philosophy then would be better, that the
4 organic movement would be better served to be
5 a little more free to approve synthetic
6 materials that are benign in nature rather
7 than get hooked up on saying, synthetic. No,
8 we don't want synthetics, and we're just going
9 to say no unless there's really a compelling
10 reason for it.

11 MR. WOLF: I think there has to be
12 compelling, you know, basically, I think that
13 there does have to be compelling reasons, and
14 I think that the criteria that were developed
15 over a very long period of time clearly
16 articulate that. I mean, I'll get into the
17 specifics as an example. Sorbitol, the
18 decisions that were made by the committee as
19 to how it fit the criteria differ on the very
20 printout than the decisions that were made by
21 the Crops Committee when it was chaired by Jim
22 Riddle several years ago for sucrose

1 octanoate. Comparing those two, the materials
2 are chemically very similar but have different
3 effects in the environment on specific
4 insects. But in terms of the criteria of
5 whether it's compatible with organic
6 agriculture, whether there is a need, the
7 decisions that the Crops Committee made were
8 different. There was a huge inconsistency in
9 that regulatory decision process, and that
10 sends a message that there's a tightening,
11 that even if you met the criteria there's an
12 opinion that it's very difficult to add
13 materials to the list. And I think you really
14 need to look at that process.

15 MR. DAVIS: I took part in the
16 sucrose, the original sucrose deliberation,
17 sucrose octanoate ester, as a very newborn
18 member, albeit; but part of the reason the
19 Crops Committee this time around with sorbitol
20 octanoate, we approved the sucrose octanoate
21 ester and saw the sorbitol material as, why do
22 we want to add another one when we have

1 something so close? Yes, there are
2 differences, but is there a compelling reason
3 to add something that's just a little bit
4 different and risk jeopardizing the overall
5 perception of organic as very limited use of
6 synthetics? Let's not just keep adding, you
7 know, if we add two or three materials every
8 year, we're going to have a list that will
9 just be ridiculous at some point.

10 MS. WOLF: Okay. I see your
11 point. I don't agree with the premise, and
12 that is that we should be looking at what are
13 the materials that organic farming currently
14 uses that are harsher. I mean I believe some
15 of these materials can replace botanicals that
16 are natural that are one of our bigger risks,
17 like the use of pyrethrin is the most dominant
18 insecticide used in organic farming in
19 general, and it has much more environmental
20 negative impact than sorbitol does. Sorbitol
21 is the only one of those two that could be
22 used in greenhouses. I mean, I've looked at

1 the product and I've looked at both of them,
2 and there are substantial differences in the
3 use pattern and in specific insects.

4 And so the general question about
5 sugar esters, it's kind of an oversimplified
6 question. So I understand the conclusion. I
7 disagree with it.

8 And I'm not worried about having a
9 lot of materials on the list for growers to
10 choose from. I hear from growers all the time
11 who don't want to convert to organic because
12 there are so few options in rotation for
13 insect control and in economic control.

14 Personally, I'm a strong advocate, and I think
15 the Crops Committee said this, that the
16 fundamental principle should be good
17 management, encouraging earth worms,
18 encouraging beneficial insects. But the tools
19 do have to be there. And I think you might be
20 in a situation where if you approve sorbitol,
21 you'd get hops off the 606, which I think
22 would be a much bigger win for this Board.

1 MR. DAVIS: Some of the lack of
2 information that we, as a committee, felt we
3 were getting was the differences between the
4 sucrose material and sorbitol material. The
5 dominant thing that the petition put forth and
6 what I could read in the web site information
7 on the two materials is sorbitol is a lot
8 cheaper, and that was the take-home message.
9 I don't think it was really given to us that
10 specifics are, okay, you just made one,
11 sucrose octanoate is not registered for use in
12 greenhouses or would not be a --

13 MR. WOLF: It has a much shorter
14 withdrawal period. I shouldn't try to, there
15 are technical people in the room who could
16 answer those questions.

17 MR. DAVIS: Okay. We'll save that
18 then.

19 CHAIRPERSON DELGADO: While we're
20 discussing the philosophical differences. We
21 have Hugh, followed by Jo.

22 MR. KARREMAN: Bill, thanks. Two

1 quick things. Your perception that maybe the
2 philosophy of the Board is changing a little
3 bit and it's tighter to get things on the
4 list, as it was to, let's say, compared to
5 five years ago, maybe that is correct in a
6 sense for various reasons but also that I
7 don't know if we want the list to get bigger
8 and bigger and bigger and bigger all the time.

9 But also perhaps that, for the
10 Sunset Review, at least from what we've been
11 talking about, it sounds like once something
12 gets on the list it's pretty much on there
13 unless new material evidence comes about to
14 take it off. So I think it should be harder
15 to get through the passing barriers to get on
16 the National List. At least that's my view on
17 the Sunset issue, and maybe that's why it's a
18 little bit harder to get on, as well as for
19 other reasons.

20 CHAIRPERSON DELGADO: Joe?

21 MR. SMILLIE: Well, one small
22 point. This is a very interesting

1 conversation. It's very constructive, this
2 dialogue that's occurred. I just have to give
3 you credit on the hops issue, having suffered
4 through putting hops on 606. You know, I'll
5 make that deal. I'll get on the Crops
6 Committee and vote so we can get hops on 606.
7 But it illustrates the point, you know, if
8 that tool was there maybe we would win, you
9 know, you lose in one area and you win in the
10 other.

11 The other issue is more
12 procedural, and that is, for those people who
13 are experts in their field and are petitioning
14 particular materials, like Devlin, I trust
15 that you will be here tomorrow because I think
16 Jerry's point is there's a whole body of stuff
17 when we get to whatever it's called, sorbitol,
18 when we get to that issue, it would be very
19 instructive to have you here and have that
20 time then when we're focused on that material.

21 CHAIRPERSON DELGADO: Any other
22 questions? Thank you. I appreciate that.

1 I'm very conscious about the time. We're one
2 speaker away from the break, and that is Jo
3 Kraemer. And, Board members, I remind you
4 that we still have about 40 speakers ahead of
5 us.

6 MS. FRANCES: Rigo, should be at 3
7 and then 3:07, and I've got two people that
8 have planes to catch and one that has to be
9 out of his room by 3:30. So I'm just really
10 conscious of that and want to take care of
11 that.

12 MS. KRAEMER: I'll go later.
13 That's fine.

14 CHAIRPERSON DELGADO: Can we do
15 that?

16 MS. FRANCES: Tim Redman and Steve
17 Mohr I know both have travel issues.

18 MR. REDMAN: I'm fine, and Steve
19 Mohr is fine.

20 MS. FRANCES: Steve Mohr is okay,
21 and Tim Redman I know has to be out of the
22 room at 3:30.

1 CHAIRPERSON DELGADO: Joe, can you
2 take a break and --

3 MS. FRANCES: There he is.

4 CHAIRPERSON DELGADO: We
5 understand you're anxious to leave us. We are
6 anxious to hear you. Please, five minutes.

7 MR. REDMAN: Thank you. I'm Tim
8 Redman. I'm the President of Blue Horizon
9 Organic Seafood Company. We started this
10 company about three years ago, and we named it
11 Blue Horizon Organic Seafood Company because
12 we thought that we would do some work with
13 organic seafood, and we haven't been able to
14 do that yet.

15 That said, I want to commend you
16 all for all of the volunteer work you do here
17 on this Board. I think it's long, long-
18 reaching and important, all the work that's
19 being done by all these groups out here, the
20 people carrying around the fish signs today,
21 our watchdogs. I think that's all important.

22 I'm here to urge you, as a Board,

1 to pass through to lawmaking the seafood
2 standards. There is a need in the
3 marketplace. There is demand for what's
4 called organic seafood because organic seafood
5 will represent the consumers' clean, safe
6 food. It will represent food that is also
7 environmentally produced in an environmentally
8 positive way. Those are two critical things
9 that organic means to consumers. There's
10 demand for it.

11 There's confusion in the
12 marketplace galore right now. I know that
13 because I talk about organic seafood to a lot
14 of trade people and to a lot of consumers.
15 You know, it's just amazing when you talk to
16 a consumer about organic seafood how many
17 blank stares you get or how many question
18 marks just pop up in the eyeballs. It's
19 there. The confusion is there, and it needs
20 to be erased by a solid standard and
21 definition.

22 Trade is also being restricted.

1 There is no trade in organic seafood now.

2 There could be and there should be, so there
3 is trade that's being hampered.

4 And also a high standard for
5 seafood farming in particular needs to be set.
6 I disagree with the person up here who
7 suggested that wild seafood be, I think she's
8 gone, but that wild seafood be the first to be
9 included within an organic definition. But a
10 high bar needs to be set within the
11 aquaculture industry. There are groups
12 defining or doing their best to set seafood
13 farming standards, and they address, primarily
14 concerns for the environment, which is great.
15 But that's just part of the picture, and the
16 organic definition will, by far, exceed any
17 standard, as it's being proposed now.

18 So I want to recommend to the
19 Board that you adopt the seafood standard,
20 that being recommended now by the Aquaculture
21 Working Group. That group has done just a
22 huge amount of background work in finding the

1 best definition. I think they've done that.

2 So that's basically it. There's
3 demand for organic seafood. There's confusion
4 and concern in the trade marketplace. There's
5 restraint of trade right now because of that,
6 and a high bar needs to be set. So I
7 encourage you to pass into lawmaking an
8 organic standard. Thank you.

9 MR. GIACOMINI: Just for
10 clarification, the Livestock Committee made
11 some changes to the AWG proposal. We also
12 presented it in two different formats: the
13 nutritional side and the net pen. Do you
14 support both of those, support changes to
15 them? What is your stand on those two
16 specifically?

17 MR. REDMAN: You mean you made
18 recommendations to the most recent
19 recommendations from the AWG, you made some
20 revisions to that? I haven't seen those, so
21 I'm sorry. We work primarily with shrimp,
22 which has no problem qualifying under the

1 current standards proposed.

2 MR. KARREMAN: Right. I read in
3 your written comment that you posted you use
4 a lot of organic shrimp, even though you don't
5 have to, and that's very laudable. And the
6 shrimp would make it; you're right. I guess
7 we posted two documents. Are you referring to
8 that as the AWG document? Because there are
9 documents. What is up for vote at this
10 meeting are two documents that the Livestock
11 Committee is recommending to pass by the full
12 Board. It's not specifically the AWG
13 recommendation we base things off of, just so
14 you realize that as a person immersed in the
15 industry.

16 MR. REDMAN: Okay. Thanks.

17 CHAIRPERSON DELGADO: Any other
18 questions? Thank you. We will take a five-
19 minute break and come back at 20 after the
20 hour so we can continue.

21 (Whereupon, the above-entitled
22 matter went off the record at 3:15 p.m. and

1 resumed at 3:28 p.m.)

2 CHAIRPERSON DELGADO: As soon as
3 the rest of the Board comes quickly down to
4 take their positions, I would like to request
5 that Jo Kraemer please step up to the mic. If
6 you're coming up to introduce yourself and
7 also thank you for the patience.

8 MS. KRAEMER: I'd like to thank
9 you for the opportunity to let me offer
10 comment, but actually the reason I'm here is
11 to request comments from you, the Board, and
12 also the meeting participants.

13 CHAIRPERSON DELGADO: Excuse me.
14 Members of the public and members of the
15 Board, please, we're in session now. Can you
16 lower the volume? We can allow the speaker to
17 proceed. Go ahead.

18 MS. KRAEMER: Thank you. My name
19 again is Jo Kraemer. I'm a chemist and
20 sampling manager for AMS' pesticide data
21 program. I'm here today to tell you about a
22 new project that we're going to be doing.

1 Most of you know about PDP. If
2 you don't, our program collects and analyzes
3 samples from across the country, about 12,000
4 samples a year, for pesticide residues. We
5 sample mostly fruits and vegetables, although
6 we do do some processed commodities. We do
7 fruits and juices. We do grains, meats,
8 poultry, dairy products, even aquaculture.
9 We're sampling catfish right now. We've done
10 honey, specialty projects, pear juice
11 concentrate, trizol projects, nuts, and also
12 drinking water.

13 Our primary data user is the EPA.
14 They use our data for their risk assessment.
15 The samples are primarily collected from
16 distribution centers and terminal markets
17 throughout the country. Our collectors
18 randomly collect samples from each of these
19 places without regard to a grower, a
20 distributor, whether it's organic or not. So
21 everything is randomly collected, which brings
22 me to the point of my comment here.

1 Looking at our database, we see
2 that we have only about one or two percent of
3 our data that is actually organic results.
4 And I have read many, many papers that makes
5 reference to and drawing conclusions from,
6 say, only seven or ten organic commodities
7 from a certain group, compared to the hundreds
8 or tens of thousands of samples that we
9 collect. So what we're going to do now is we
10 need more organic samples.

11 What we're projecting to do is
12 we're starting a pilot program starting in
13 January. We're going to be collecting only
14 organic samples. So my question to you all is
15 -- we're in the process of developing it now.
16 We're going to start at a half-sampling rate.
17 We're going to start out with a commodity of
18 bagged lettuce. We're not targeting any
19 specific product that has anything to do with
20 pesticides on it or not. It's mostly
21 logistics.

22 Lettuce is a very high-consumption

1 item. It's also high-consumption for young
2 children. It's already being collected by our
3 microbiological data program, so,
4 logistically, it's very easy for us to go
5 ahead and collect right now. Also, it is
6 readily available throughout the country. In
7 some places, we collect, our small mom and pop
8 places, just very small, so we want to make
9 sure we get a commodity that we know is there
10 organically.

11 My question to you all is -- we
12 need some suggestions, questions, guidance,
13 ideas, where to go with this project once we
14 start it. If you all have any comments that
15 you'd like to incorporate certain commodities
16 or anything, we'd liked feedback from you.
17 I'm here just to let you know that our web
18 address, and plus you can look at, we have
19 data on the web, if you'd like to write down
20 the web address it's www.ams.usda.gov/pdp.
21 You can see what we're sampling every year.

22 You can contact me at

1 jo.kraemer@usda.gov or you can contact myself
2 or Diane Haynes. Diane, would you stand up
3 here? She's in the back there. She is our
4 technical director and deputy director. So if
5 you have any pesticide residue questions, you
6 can contact her. I'll be here today and
7 tomorrow. If you have any comments, we would
8 like to take them for future directions for
9 our testing of organic products. Thank you.

10 CHAIRPERSON DELGADO: You're
11 welcome. Any questions? Steve?

12 MR. DEMURI: It doesn't sound like
13 you had any specific plans for the data you
14 collect, but if you happen to find something
15 that was over, that had pesticides on it that
16 was organic, would you give that information
17 to the enforcement folks at the USDA?

18 MS. KRAEMER: Diana, what do we do
19 with the data?

20 MS. HAYNES: (Talking off mic.)

21 MS. KRAEMER: We're not
22 enforcement, we're a monitoring program, so we

1 would notify the proper agencies.

2 MR. DEMURI: And what would the
3 NOP do with that information? I mean, any
4 comments from the Program? If you receive
5 data from her group that there was an organic
6 product out there that had pesticides on it,
7 what would you do with that information?

8 DR. ROBINSON: I'm not sure. It's
9 not a zero tolerance program. We do know that
10 there are some levels of pesticides already.
11 My understanding is --

12 CHAIRPERSON DELGADO: Barbara --

13 DR. ROBINSON: Oh, I'm sorry. Jo,
14 correct me if I'm wrong, but my understanding
15 is you already do collect or do samples of
16 some organic products?

17 MS. KRAEMER: Yes, and it's a very
18 low percent.

19 DR. ROBINSON: Right. So they're
20 expanding their coverage. What are we going
21 to do with it?

22 CHAIRPERSON DELGADO: Is the

1 microphone on?

2 DR. ROBINSON: Yes. I mean, what
3 are we going to do with it if we can get data
4 on it? If the PDP were suddenly to find that
5 there's a tremendously increased pesticide
6 levels in organic produce, what we would do,
7 I guess, is it, obviously, would increase our
8 concerns and make us, you know, tell the
9 compliance and enforcement people to start
10 doing a more careful job of its enforcement
11 and auditing. That would be something we'd
12 start taking a look at more closely. But just
13 to say that there's some pesticide residue in
14 produce wouldn't do anything. It's not a zero
15 tolerance program.

16 MS. KRAEMER: I was just going to
17 say this might be something for you all to
18 consider and help direct us on what you'd like
19 to see done with the data.

20 CHAIRPERSON DELGADO: Okay,
21 excellent. Hugh?

22 MR. KARREMAN: Is it just on crops

1 you're looking at or other organic products,
2 as well? Because I got sent something to me
3 in the mail the other month regarding organic
4 milk and looking at, say, analytes.

5 MS. KRAEMER: We have in the past
6 tested milk for pesticides, three different
7 times actually in the history of our PDP
8 program. We do have some organic samples
9 which we found some residues, but it was low.
10 What is your question exactly?

11 MR. KARREMAN: I'm just wondering
12 if it was just crops or if you're actually
13 going to be also looking at milk products, as
14 well.

15 MS. KRAEMER: Well, in the past,
16 we have just randomly, across the board,
17 collected a few samples that amounts to about
18 one or two percent per commodity that we
19 tested. We test about 16 or 17 different
20 commodities each quarter, and they're rotated
21 every two years. We do have organic
22 commodities in there that we test across the

1 board, whether it's grain, dairy, fruit and
2 vegetables, drinking water, whatever. So we
3 do test everything.

4 But what we're proposing to do to
5 get more data out there that can be used by
6 whoever wants to use it is to intensify and
7 get some good data out there that can be used
8 to determine what really is in those
9 commodities. If this pilot project works,
10 we'd like to continue it on year to year and
11 switch commodities as we go.

12 CHAIRPERSON DELGADO: Okay. We
13 have Julie, followed by Mark.

14 MS. WEISMAN: I have two
15 questions, one to follow on what you were just
16 saying. Would the hope be to get more refined
17 baselines of what constitutes background
18 pesticide, like, say, for certain types of
19 crops as opposed to what would then be an
20 indicator that something is going on that's
21 not supposed to be? Is that --

22 MS. KRAEMER: Well, there are

1 certain environmental pesticides that are in
2 there now that you can't do anything about,
3 the metabolites and everything. We're just
4 testing across the board. We have a list now,
5 which I do have a list and I could show
6 whoever wants to look at them, the analytes
7 that we're going to be testing for lettuce is
8 coming up. And, of course, it depends on what
9 we found in lettuce in the past, what we think
10 might be out there. It depends on the
11 commodity.

12 MS. WEISMAN: And my second
13 question is are you limited to domestically-
14 grown crops, or are you going to be looking at
15 things coming in from --

16 MS. KRAEMER: Very good question.
17 We do both domestic and imported, and we show
18 in our book, we find, actually, that a lot of
19 imports have a little bit more than domestic.
20 But, again, it depends on the commodity, but
21 we will be testing both imports and domestic.

22 CHAIRPERSON DELGADO: Barbara,

1 followed by Jennifer.

2 DR. ROBINSON: The other thing to
3 remember, too, is that, you know, in the past,
4 when PDP reports the pesticides, you know, the
5 other thing to consider is what pesticides?
6 There's things like DVT or DVT's metabolites.
7 Those things persist in the soil for 50 years,
8 and you're not going to get rid of those
9 things. And there can be extremely low
10 levels, things like dioxin and stuff like
11 that. We require that producers not apply
12 prohibited substances for three years when
13 they convert land. There's very little virgin
14 land and probably no virgin land left in the
15 United States.

16 So I don't want people to look at
17 this as the, okay, gosh, PDP is out there and,
18 you know, they've tested organic products and
19 they find some levels of pesticides. That
20 doesn't mean that producers are out there
21 deliberately applying prohibited substances.
22 I mean, the fact of the matter is there have

1 been chemicals applied that persist in the
2 soil for many, many years. And the levels are
3 reported, or you can get the levels reported
4 because we've asked back to PDP because we get
5 these questions occasionally and the nature of
6 the exact pesticides. And they're low,
7 they're old pesticides, they're stuff that's
8 been applied in the soil previously. We're
9 not seeing, you know, evidence, when we look
10 at it, that there's evidence that people are
11 not complying with the regulations.

12 CHAIRPERSON DELGADO: Jennifer?

13 MS. HALL: So I just want to
14 clarify that you're looking to the Board and
15 the organic community to give you feedback on
16 different crops and products that we would
17 find helpful --

18 MS. KRAEMER: Whatever input you'd
19 like to give to us. We're just developing
20 this project right now. We're starting out
21 just with a small collection of one commodity,
22 and we'd like to know where to go with it,

1 what data needs are out there, where you would
2 like to see it go.

3 MS. HALL: So what's to be tested
4 and then what sort of results we might be
5 curious about once that data is collected; is
6 that right?

7 MS. KRAEMER: Right.

8 MS. HALL: Okay.

9 CHAIRPERSON DELGADO: Any more
10 questions? Thank you very much. We're moving
11 on to Steve Mohr, followed by Brian Baker.
12 Just to let you know, we're on number 22 of
13 60.

14 MR. MOHR: Thank you for your time
15 today. My name is Steve Mohr from Onalaska,
16 Wisconsin. I'm here today representing my
17 company, which is Foundation Organic Seeds,
18 LLC. We are a grower and marketer of organic
19 seed, corn, alfalfa, clover, and organic
20 grasses. I'm wearing two hats today. I'm
21 also a member of the International Organic
22 Inspectors Association. I've been active for

1 five years doing that, so I get to see kind of
2 both sides of what's going on in the market
3 out there. I'd like to mention a few things
4 today as it relates to some of your proposals.

5 I see in the discussion section,
6 when I read that, it looked like, as a panel,
7 you got it really nailed down and identified
8 a lot of the problems and some things that
9 might, long-term, really serve the industry,
10 specifically if we could increase usage it
11 will increase the availability and selection
12 of organic seeds. We really need the money
13 coming in and these guys buying and supporting
14 us in order to support them with more and a
15 better line of products.

16 But, unfortunately, as an
17 inspector and a marketer, I do a lot of on-
18 farm calls, especially with larger farmers in
19 different states. You kind of target the
20 bigger, what I call commercial organic
21 producers, rather than the guys that are
22 living organic as a lifestyle in the farm

1 they're in as a business. And I've noticed
2 some actually going back to untreated seed,
3 and this trend is disturbing because it looks
4 like they're getting better educated on
5 wording, with how the NOP rule is worded, and
6 then we are doing a better job as certifiers,
7 inspectors, and marketers of educating them
8 how to get around the rule or just go by the
9 letter rather than the spirit of the rule.

10 Some examples, just as marketers,
11 here's a letter I got from one of my
12 competitors in another state. Two organic
13 producers fall this year. One section says,
14 "This year, we have reduced quantities of
15 organic corn available due to a shortage of
16 available organic production agents, so we
17 have produced some of our own corn hybrids
18 conventionally as untreated seed. If you
19 purchase this seed, we will provide you with
20 the letter explaining the substitution to your
21 certifier."

22 So they're doing the work for the

1 farmer and making it all okay. And I'm not
2 living in a glass house. I can't throw the
3 stones because I've done some of the same
4 stuff. Usually, though, when I have some
5 products that have specific traits, like corn-
6 borer resistant corn, leafhopper resistant
7 alfalfa, things the farmer needs to actually
8 get a crop, not an extra five bushels of yield
9 or save himself, you know, 30 bucks a bag,
10 what these folks will be doing.

11 And there's other examples I've
12 seen. They're doing inspections. There's a
13 large outfit in the Midwest. They've got
14 consultants out. They do soil tests. They
15 promote organic, but their seed line they sell
16 is conventional. And their explanation letter
17 to give to their farmer customers is, "Here's
18 this list of products, and we have determined
19 that these products are better under organic
20 situations than comparable organic varieties."
21 No evidence, no documentation, just the letter
22 saying we say it's so, and, of course, they're

1 selling. So we're kind of helping them along.

2 Unfortunately, I think they've
3 gotten to know Section 205.204(a)(1)
4 equivalent organic variety. They have a
5 different definition than most people. Most
6 farmers, when they talk equivalency, they're
7 referring to yield, which is money to them.
8 And if you can't meet or beat what they're
9 using then you don't get the business.

10 When I was up in Michigan, some of
11 the large farmers I called on in October, I've
12 already ordered their untreated seed, so you
13 can get on the farm if you can promise you'll
14 beat what they're using. And part of your
15 explanations today under what the farmer can
16 do, there is a word in there, a couple of
17 them, that says if he has on-farm yield trials
18 and can show that the untreated is better,
19 he's good. That just scares me to death
20 because I've got to compete with all that
21 DuPont corns, Monsanto corns, Syngenta corns,
22 and Dow corns. They own Pioneer, DeKalb,

1 Novartis, Syngenta. That means on-farm trial.
2 My company has to beat any and all of them to
3 get the business so they will buy organic. If
4 I can't beat them, they don't have to buy
5 organic. So that's what myself and the other
6 organic producers are up against out here.

7 There is an answer. I think if we
8 emphasize seed type instead of variety,
9 emphasize seed traits, specific traits, and
10 then de-emphasize the word equivalent. I
11 think that will help give the certifiers here
12 more to go on and less paperwork in doing it
13 that way.

14 So, in conclusion, I'd ask please
15 don't accept on-farm trials as the last word
16 in whether they use organic or conventional.

17 CHAIRPERSON DELGADO: Any
18 questions? Kevin?

19 MR. ENGELBERT: One thing you
20 didn't touch on. Do you foresee any problems
21 in the future obtaining the genetics that are
22 currently being bought up by all the big seed

1 companies, or are they still going to be
2 available for organic growers like yourself?

3 MR. MOHR: I have a conventional
4 company, as well, that my seed license is
5 through, and there are better hybrids
6 available. If we have to compete with these
7 untreated conventionals, we can compete with
8 it, but we're going to have to get treated
9 inbreds to do it because of the conventional
10 list that's out there available to us who are
11 licensed with these large, licensed with,
12 like, some of the Syngentas and some of the
13 big breeding outfits, they license out their
14 stuff. You can get it, but only about half of
15 it is available untreated. Some are off
16 limits because whoever bred them, invented
17 them, might be a chemical company, might be a
18 smaller company, they don't want it out the
19 door untreated. They know it's going organic
20 and, for whatever reason, maybe it's purity
21 issues, maybe it's lawsuits, maybe they don't
22 like organic.

1 But if we would take those, grow
2 them, and just sell them untreated, yes, then
3 we could compete with these on-farm things and
4 have a little better lineup. But just another
5 point along with that, the products we have
6 now, myself and my competitors at Blue River
7 and some of the other ones, we're in like the
8 University of Wisconsin field trials. We've
9 got corns that go over 200 bushels an acre,
10 which is probably 80 bushels higher than the
11 average organic. But that's not good enough
12 for an on-farm trial. It's what happens out
13 there, what he's been using.

14 So the genetic potential is there
15 now to do more than what most of these guys
16 need, but we're fighting. When you get on
17 that farm you've got to take it away from the
18 untreated stuff in a lot of cases, not all of
19 them. There's a lot of guys that do make an
20 effort, and a lot of these farmers do a good
21 job of sourcing organic. But we need a lot
22 more volume to really increase for us to do a

1 better job than these organic growers.

2 CHAIRPERSON DELGADO: Any other
3 questions? Joe?

4 MR. SMILLIE: I heard what you
5 said. You've read our recommendation, and you
6 had one specific about the on-farm trial. Did
7 you have any other specific comments?

8 MR. MOHR: It would be nice if you
9 could get away from the words "equivalent" and
10 "variety." A lot of people misuse the term
11 "variety." They say define your variety. I
12 get calls, "Do you have organic Pioneer
13 37B08?" "Well, no, only Pioneer has got
14 37B08." "Well, I need that. I need that in
15 organic variety or organic form," "Well,
16 you're never going to get it because it's a
17 chemical company." But they're using that,
18 they're twisting it.

19 The same way with alfalfa, and
20 alfalfas are really varieties. Alfalfa is a
21 little different game than corn. We can get
22 away from that and just say seed type, and

1 they think, well, type is corn, it's canola,
2 it's millet, you know, it's more easily
3 distinguishable. And then if they need a
4 specific trait, I don't have a problem with
5 them, especially if we can't get what they
6 need, then, yes, they need seed to plant. But
7 if we can just get away from some of the
8 wording that's in there because the guys are
9 twisting it to their favor.

10 CHAIRPERSON DELGADO: Any other
11 questions? Okay. Well, thank you. We'll
12 move on to Brian Baker, followed by Jean Mann.
13 And it's my understanding that, Brian, you
14 have a proxy?

15 MR. BAKER: Yes, that's right. I
16 have a proxy from Miguel Guerrero. And, also,
17 if it pleases the Chair, I would like to
18 introduce Renee Mann, OMRI's Review Program
19 Manager, and would ask if it's all right if
20 she spoke first and then I followed after her
21 and then you reserve your questions until
22 after both of us have spoken. That will save

1 some time.

2 CHAIRPERSON DELGADO: We'll go on
3 then with Ms. Mann, and you'll have five
4 minutes.

5 MR. BAKER: She also has a proxy.

6 CHAIRPERSON DELGADO: You have a
7 proxy, Jean?

8 MS. MANN: Renee Mann. I have a
9 proxy from Dave Decou.

10 CHAIRPERSON DELGADO: Okay. So
11 you'd have ten minutes.

12 MS. MANN: I won't take it all.

13 CHAIRPERSON DELGADO: Please.

14 MS. MANN: Okay. Again, my name
15 is Renee Mann, and I'm the Review Program
16 Manager at OMRI, the Organic Materials Review
17 Institute. Thank you to the NOSB for being
18 here and listening to our comments, and thank
19 you for all of your hard work.

20 I just want to say something real
21 quick about OMRI. We're an independent non-
22 profit organization whose mission is to review

1 input materials for use in organic production.

2 We're very happy this year to have achieved
3 ISO 65 accreditation and also to have been
4 recognized as a reputable third party source
5 for verifying input materials by the NOP. So
6 we're very excited about that.

7 I was going to talk briefly about
8 inerts and petitioned materials. So for
9 inerts, we want to say that we support the
10 NOSB in their re-opening the discussion on
11 inerts, which is really important to us
12 because we review a lot of pesticide
13 materials. As you may know, we look at all
14 the ingredients in pesticide materials,
15 including active and inert ingredients. And,
16 right now, because we're reviewing fully-
17 formulated products, it's confusing to us
18 what's going on with, well, not confusing but
19 it has been a challenge to review input
20 materials to the 2004 list.

21 So we don't actually have an
22 opinion at this time about what should be done

1 with inerts, but we did want to point out --
2 great, huh? I did want to point out that
3 there's one recommendation to accept the 40
4 CFR 180.950 list, which I see makes sense.
5 Unfortunately, not all of the 4A material is
6 moved on to that list, so I wanted to point
7 out that some of them would not be allowed if
8 that was the only piece that you adopted into
9 the NOP rule or recommended.

10 I also needed to point out that
11 most of the 4Bs are not on that list. From
12 the products that we've reviewed, I know that
13 about or up to half of the pesticide materials
14 contain 4Bs, and so if you were to only accept
15 180.950 then a lot of the products would come
16 off of our list. I'm not saying that's a bad
17 thing. I'm just saying that that is a
18 consequence, a possible consequence.

19 So we're offering our assistance.
20 If you'd like to learn what kind of materials
21 on our list and what kind of inerts are in
22 those pesticide products we would be willing

1 to discuss that with the Board. Obviously,
2 some of that information is confidential, but
3 sometimes we can gather information together
4 so that it doesn't relate to one particular
5 pesticide product. So we can give you some of
6 that information when you're developing your
7 recommendation.

8 The other thing I want to talk
9 about is petition substances. We don't have
10 any specific comments on the petition
11 substances, but I just wanted to ask that TAP
12 reviews get posted to the web site because not
13 all of them were available. So that's a
14 little bit hard for us to comment when the TAP
15 reviews aren't available.

16 Last is the procedure to handle
17 technical reviews. I forgot I was going to
18 mention that. OMRI considers the independent
19 review of the materials important. We said
20 this in our written comments, so I'm just
21 repeating that. And aside from the issue of
22 who actually conducts the TAP review, I wanted

1 to implore you all to make sure that when the
2 TAP reviews are done that they include
3 complete technical information. OMRI relies
4 on TAP reviews at times to clarify what has
5 been added to the National List. It's not an
6 ideal situation. Hopefully, the National List
7 makes sense on its own, but that's not always
8 true. So we go back to TAP reviews. It's
9 extremely helpful to us when the TAP reviews
10 are not redacted and parts are confidential
11 information, but I understand that that
12 happens. Nevertheless, whatever public part
13 of the TAP review you could put on the web
14 site that would be fantastic for us.

15 The other thing is whatever
16 recommendation you make, please do put the CAS
17 numbers and the 1(a) taxonomic classification
18 in there. That's extremely helpful for us,
19 and that allows for a clear recommendation.

20 Finally, one example, the
21 information that you put into the TAP reviews
22 is important to us because we had to go back

1 in peracetic acid and processing to check to
2 see what was intended when that material was
3 added. And, unfortunately, when there's
4 confusion, you end up communicating with the
5 NOP back and forth a lot and spending a lot of
6 time trying to figure out what was the
7 intention of what was added to the list. Was
8 it peracetic acid? Was it the stabilizers of
9 peracetic acid, HEDP? There's other materials
10 that we commonly see, so the very first thing
11 that happened when that was added to the list
12 is we had a number of products under review,
13 and we couldn't list them because there was
14 still confusion after peracetic acid was added
15 to the list. So more clarification in the TAP
16 reviews, more in-depth review of the
17 formulations that are used to make those
18 synthetic materials or non-synthetic materials
19 is very important to OMRI.

20 I think that's it. Brian? Thank
21 you.

22 MR. BAKER: And I'm Brian Baker,

1 the Research Director of the Organic Materials
2 Review Institute. Mr. Chair, Madame Director,
3 members of the NOSB, and staff of the NOP,
4 thanks, again, for the opportunity to speak.
5 I'm going to be speaking on materials,
6 materials, and more materials, and I don't
7 know if anyone expected anything else from me.

8 OMRI understands how difficult
9 materials review can be, and you need all the
10 help you can get. You should rely on the
11 whole community that's here to help you.
12 We're here to serve you and assist you to make
13 well-informed, broadly-supported, and
14 transparent recommendations. We ask you to
15 not go it alone.

16 This isn't any reflection of your
17 qualifications. We understand there are well-
18 qualified experts on the NOSB. But in the
19 interest of a better process, we respect the
20 role that the NOSB plays as a stakeholder
21 body, and there's an expert function that also
22 needs to be played. And the intention was to

1 have a technical advisory panel that's
2 separate from the NOSB that's convened by the
3 NOSB in order to serve that expert function.
4 Separation of function was a very important
5 part of what the organic community put
6 together. And we hope that you're not
7 stretched beyond your limits in your volunteer
8 work. Any recommendation to amend any section
9 of the National List should be made only after
10 you have an external technical review. We
11 think that's good sense.

12 We found the notice to take
13 petitions off the table a bit puzzling, and
14 we're concerned why it's coming up at this
15 point and what it means. All of the
16 substances we found in the notice, the
17 specific substances, these were all petitioned
18 prior to July 13th, 2000 and the revision of
19 the National List petition process. This may
20 be semantics. I don't know if it's
21 significant, but it looks, according to our
22 records, these substances were all addressed.

1 They're not still on the table; and, in some
2 cases, we have no record of them ever even
3 being petitioned. And several of them had
4 been not just completed, but they appear on
5 the National List and our written testimony
6 documents where they currently appear on the
7 National List.

8 So we're just wondering what's up
9 there. But, at the same time, there are a
10 number of substances that appear to have
11 fallen through the cracks. Some we see are on
12 this meeting's agenda, but there are several
13 that we think the NOSB should take up because
14 they've never been fully addressed. These are
15 also documented in our written testimony and
16 include things like potassium carbonate,
17 phosphoric acid, sodium lactate, potassium
18 lactate, soy protein isolate in polymers.

19 We're aware that there was an
20 effort to get clarification on synthetic/non-
21 synthetic or what was currently on the
22 National List. But we don't have anything

1 documenting the NOSB consideration of these
2 clarifications. And there's just sort of, the
3 petitions are still open from what we can
4 tell. We are looking for clarification there.

5 OMRI applauds the Materials
6 Working Group, Kim Dietz, Gwendolyn Wyard, and
7 leading the Materials Working Group in that
8 difficult task. OMRI's staff and members of
9 the advisory council were involved in the
10 process, but, at the present time, OMRI
11 supports option one, which is no change in the
12 status quo.

13 Can the National List, can the
14 process be better? We think it can; there's
15 no doubt. But there's no clear consensus for
16 any of the alternative options, and we think
17 that these all deserve to be developed more,
18 discussed more by the organic community, and
19 carefully considered before any of those
20 options are adopted. All the stakeholders
21 need to be consulted on it, and the people who
22 will be impacted by the change that have not

1 been part of the discussion today, they need
2 to be heard.

3 So I'm hoping that the Materials
4 Working Group will come up and come and make
5 us an option we can't refuse. What I ask for
6 is the irresistible option and something that
7 would have the broad consensus and support of
8 the organic community would be embraced.

9 I would like to point out that the
10 whole question of agriculture and non-
11 agriculture is just the start. We really need
12 guidance on what's synthetic and what's not
13 synthetic and look to that project that got so
14 far and still has not been finalized. We'd
15 like to help bring that to completion.
16 There's also the distinction between what's
17 production and what's processing, what's
18 handling. And then what's an ingredient?
19 What's a processing aid? What's a cleaner,
20 sanitizer, and disinfectant? These categories
21 in the rule, these categories on the National
22 List are somewhat blurred and somewhat fuzzy.

1 We would like to have a bright line and
2 understand there's a need for discretion, a
3 need for ambiguity. But on the whole, life
4 would be a lot simpler if we could just say
5 what was what.

6 So we ask to reaffirm the previous
7 recommendations made on synthetic and non-
8 synthetic. We're seeing with the continued
9 advance in technology questions about genetic
10 engineering are getting more complicated and
11 difficult to solve. It's not as clear-cut or
12 as simple as it was in '97 or 2000. So that's
13 another complicating factor that deserves
14 attention. And contamination by prohibited
15 substances, such as pesticides, we heard
16 earlier from the PDP, this is also an issue
17 that deserves attention and how we can deal
18 with the incursion prohibited substances into
19 organic food.

20 OMRI has not dealt with 100-
21 percent organic label. We find ourselves
22 completely outside of that discussion. We

1 don't review if a substance can be used in a
2 100-percent product. We just don't go there.
3 Our written comments suggest five different
4 ways to resolve the problem, and there may be
5 others. But right now I think the proposal
6 leaves more questions than answers.

7 With that, I'd just like to close
8 with saying that OMRI was established for
9 public benefit. We see a good working
10 relationship with the NOSB and the NOP as
11 essential to fulfill our mission. Please let
12 us know how we can be of service. Thank you.

13 CHAIRPERSON DELGADO: Questions?
14 Okay. Thank you very much.

15 MR. BAKER: Thank you.

16 CHAIRPERSON DELGADO: Up next is
17 Kim Dietz, followed by Emily Rosen.

18 MS. DIETZ: Good afternoon. My
19 name is Kim Dietz, and I'm not going to be
20 commenting on Materials Working Group yet, so
21 you'll have to wait until tomorrow. I feel
22 like there's suspension in the air. Gwendolyn

1 and I will be having a presentation about 8:45
2 or 9:00, somewhere in there in the morning.
3 And we'll try to summarize in 15 minutes about
4 54 pages of our work over the last year.

5 So I'm Kim Dietz. I'm with
6 Smucker Quality Beverage, and I'm going to be
7 making comments somewhat on behalf of my
8 company and then also take that hat off and
9 make comments as a past NOP member and
10 materials person.

11 So with that, from a company
12 standpoint, I wanted to just comment on
13 ethylene for pears. We do a lot of organic
14 pear juice, and we do not need ethylene. And
15 I believe I was on the Board when we
16 originally voted on that, so we specifically
17 have one intent for ethylene. We talked about
18 pears and all kinds of different things, but
19 we didn't feel it was needed at that time.
20 And I think from even Miles' comment in
21 Washington, I'm not sure whether people are
22 really using it that much. When you put pears

1 inside of a big room to ripen, they produce
2 their own ethylene. Now, it might not be
3 consistent, but do we need pears year-round?
4 I don't know. That's a question you'll have
5 to decide.

6 So my other comment to that would
7 be if you are going to change the annotation,
8 there was discussion about, well, if it's okay
9 for bananas and it's okay for pears then it's
10 okay for this, you should just consider
11 dropping the annotation all together.
12 Because, otherwise, somebody else is going to
13 come up in a year or so and say, "Well, what
14 about for this?" and you need to just kind of,
15 if you're going to allow it then allow it. If
16 you're going to limit it specifically for
17 something, limit it. But if you don't know
18 why it's okay for one and not the other then
19 drop the annotation all together.

20 Okay. As far as materials, I'll
21 take my company hat off for a minute, three
22 words of advice for you: process, history, and

1 consistency. Sitting in the audience is
2 somewhat painful sometimes as a past person
3 who's dealt a lot with materials. Use the
4 tools you have, again; follow the process.
5 You have a lot of history here, a lot of
6 different people who have worked on materials.

7 When I hear things like, well,
8 we're just not going to put it on there
9 because there's too many materials, yes,
10 you're the keepers of the list. That's true.
11 But if you're not going to add something, make
12 sure you have a legal ramification not to do
13 that. If there's a similar material on the
14 list, then you need to really be specific why
15 something shouldn't be allowed and have some
16 legal something behind that. Don't just say
17 there's two things. If you're not sure, if
18 there's something that you need more
19 information on, you need to defer the vote
20 because you're not doing the people who come
21 to these meetings a service if you vote on
22 something you don't have all the information

1 that you need. Either you get it before the
2 meeting, get it at the meeting, or defer the
3 vote until you have everything.

4 Just history again. There's a lot
5 of information out there on past history on
6 materials, how to do the process. You've got
7 a lot of tools out there for that and the
8 consistency, as well.

9 Lastly, on the 100-percent
10 labeling, I really don't have any comments on.
11 I support your recommendation. I just believe
12 that you need to have something going out of
13 this meeting for the industry. We have
14 products on hold, labels on hold, waiting for
15 the decision to come out of this. So a lot of
16 people are somewhat working on changing 100-
17 percent off the labels, and some people have
18 already gone down that road. So there's a lot
19 of money being invested, a lot of time, based
20 on some of the other, I guess, people telling
21 you they need to change their labels. So I'm
22 not quite sure what's going on with that.

1 Oh, and, lastly, on materials,
2 your Federal Register notice, we're waiting on
3 a material, our company is waiting on a
4 material that was petitioned in 2004. The
5 recommendation was in 2007, and it's still not
6 even in the Federal Register notice. So
7 please make sure those keep getting through
8 the process because we're holding off some new
9 products for that.

10 Okay. Any questions?

11 CHAIRPERSON DELGADO: Any
12 questions? Steve?

13 MR. DEMURI: Looking back, seeing
14 where we distinctly describe why it was
15 allowed for tropicals and not for pears or
16 other fruits. And I can see your point and I
17 agree with you that why have the annotation,
18 but there really was no description of what
19 the previous Board was thinking. Do you have
20 any idea of what that might have been?

21 MS. DIETZ: Well, I believe the
22 petition, I'm not sure, but I believe it was

1 for specific use at the time, and that's what
2 we voted on. And that's why we went into it
3 with the annotation.

4 CHAIRPERSON DELGADO: Joe?

5 MR. SMILLIE: Process information,
6 your other coats, and then you say that we
7 should get that 100 percent out the door.
8 There's a conflict there. We realize that our
9 intent, like a lot of intents for the 100
10 percent, was a good intent. But it has been
11 pointed by a number of commenters, there's
12 some technical inaccuracies in the
13 recommendation. There's some murky area.
14 There's some bad definitions. And to clean
15 those up during this meeting is a possibility,
16 but when we listen to public opinion until
17 9:00 at night, time disappears.

18 So although I agree with you, I'd
19 like to get the 100-percent recommendation out
20 the door, we would have to be able to do a lot
21 of work on that document right now in order to
22 get a more feasible document out the door. It

1 was my intention, as chair, to get what we
2 could from those recommendations out. And if
3 there were a couple of issues that were cloudy
4 just drop those. But it looks right now, and
5 I'm waiting to hear more opinion, whether it's
6 right, whether the correct approach is to get
7 it right and do it later or to get what we
8 think is basically pretty close to good and
9 get it out there because I realize, as you
10 have stated, that there's a lot of people out
11 there making decisions on their labels that
12 involve a lot of money and a lot of product.

13 One of the decisions that isn't
14 brought up, not whether to change the label
15 from 100 percent or not, is to whether not to
16 use, let's say an inert gas, like nitrogen,
17 and just put the product out there for the
18 shorter shelf life, for example, or not to use
19 carbon dioxide to fumigate the berries and
20 just hope they don't develop, you know, fungal
21 spores or what have you. So there's a lot of
22 things at stake here on that issue, and we

1 want to get it right and we want to serve the
2 industry, and it looks like we have a lot of
3 work to do to get it right before we can get
4 our intent clear to put it out.

5 That's a long comment, but I'd
6 like you to answer because you said follow the
7 process.

8 MS. DIETZ: Right. And the reason
9 that I said that about the 100-percent label
10 is because there's been directed by the NOP to
11 companies to change. So we're in the process
12 of that change, and then, all of a sudden,
13 there's a recommendation by the Board, so now
14 we're in this limbo land. You know, we need
15 to be able to have time to say, okay, well,
16 let's just hold off and not do any label
17 changes and wait another year and have 100-
18 percent label claims out there and go as-is or
19 come out of this meeting with a recommendation
20 on what we're going to do moving forward.

21 Somewhere it needs to give. We
22 need to know what to do; I guess that would be

1 my comment. Not to push it through, but we
2 need direction coming out of this meeting
3 where the 100-percent label claim stands. Are
4 we just going to back off a little bit until
5 the decision is made and people continue to
6 label as-is; or do we move forward in changing
7 labels?

8 MR. SMILLIE: I would like to ask
9 the Program if they would want to comment on
10 this issue.

11 CHAIRPERSON DELGADO: Any comment
12 from the Program? Any questions?

13 MS. DIETZ: Thank you.

14 CHAIRPERSON DELGADO: Okay. Up
15 next is Emily Brown Rosen, followed by
16 Gwendolyn Wyard.

17 MS. ROSEN: Hi. I'm Emily Brown
18 Rosen. I'm the Policy Director for
19 Pennsylvania Certified Organic, an organic
20 certification agency right around the corner
21 here. Thank you for the opportunity to
22 comment again and one more for your patience.

1 This, you know, it turned out to be a big deal
2 to comment at NOSB meetings, and it's great,
3 you know, that you're willing to seat here and
4 do this, and I think it's also very important
5 for the industry. I'm thinking maybe we could
6 schedule more listening sessions at some point
7 in the future because I can see how it's
8 getting hard for you to manage this. But
9 whatever. I'm glad to have an opportunity.

10 We have also provided written
11 comments, hopefully you've seen them, that are
12 more detailed. So I'm just going to kind of
13 summarize them here quickly. Oh, I do have a
14 proxy from Melanie Saffer. Did you get that
15 on your list? But, hopefully, I won't need
16 that full time.

17 MS. FRANCES: We put you down for
18 tomorrow.

19 MR. ROSEN: I might not need that.
20 Okay. So, number one, the Materials Working
21 Group, I was glad to participate in that
22 group, and I think we did great work. I

1 really thank Gwendolyn and Kim for providing
2 leadership and putting together some really
3 good information. As you can see, it's a very
4 large document.

5 We had a lot of diversity of
6 opinions. We did try to slim it down to tease
7 out some of the key points more this time
8 around. But, you know, it's a tough issue.
9 At this point, my feeling is that there's not
10 any option that's going to be perfect, but we
11 urge the Board to move forward quickly on
12 adopting a recommendation. I think the
13 Materials Working Group has done enough on
14 that topic and it's your turn to take it up
15 and hopefully get a recommendation for us next
16 meeting that we can all jump on board with.
17 In the meantime, we'd be happy to keep
18 working, speaking for myself at least, but I
19 think most of the group would like to keep
20 working on the synthetic/non-synthetic thing
21 and get something to you before the next
22 meeting, so we can move ahead on these

1 critical issues.

2 I had sort of a mental block after
3 I worked on it all during the summer, so I
4 didn't get you a written comment on this. But
5 re-reading the other comments and reading
6 Oregon Tilth's comment, I think option three
7 is the best choice. That's my opinion. I
8 think this is, you know, a bit of a change,
9 but what this basically does is require
10 commercial availability of all items on
11 205.605, and you change the title of 605 from
12 being non-agricultural to just being non-
13 organic substances. So they're not clearly
14 agricultural or non-agricultural. I think
15 this is doable because OFPA doesn't even
16 mention the word "agricultural." You save 606
17 for all the things that are clearly
18 agricultural.

19 Keep yeast and microorganisms and
20 bacteria all in 605. There will still be a
21 requirement to use them in processed food when
22 they're commercially available. You can still

1 certify them as organic if you can produce
2 them according to standards because they're
3 just on the list as non-organic at the moment.
4 They're not there as non-agricultural.

5 So, legally, I don't think that's
6 a problem. And that way it's kind of the best
7 of all worlds. It also does not interfere
8 with the livestock requirements, which, you
9 know, unfortunately, have a split system with
10 the processing list. Everything has to be on
11 the list. With the crops and livestock list,
12 we have this open-ended list with, you know,
13 synthetics on the list and then naturals that
14 are not listed. So it kind of conflicts.
15 That's part of our problem here, trying to
16 make a rule that works for, a list that works
17 for processing and doesn't conflict with the
18 needs of our livestock and crop materials.

19 So I think that will work. It may
20 not be perfect, but I think it will work. And
21 it also bumps up this whole idea for organic
22 preference, you know. When we can do it, when

1 the technology is there, when people are
2 better at finding organic substrate for
3 microorganisms or bacterial cultures, then it
4 can be done, and we'll still keep pushing the
5 envelope that way. So I know I'd just like to
6 go forward. You know, whatever you do, we've
7 got to go forward because we've got to try to
8 be more consistent here.

9 Second, 100-percent organic label.
10 We do agree with many commenters. And as
11 certifiers, we've had a continuing round-robin
12 about how difficult the 100-percent organic
13 label is, how confusing it is, and really
14 causes more problems than it's worth, it seems
15 like. One solution would be to drop this
16 category as a label claim. It's not in the
17 OFPA. It's not permitted in Canada or the EU,
18 and it causes a lot of confusion. People can
19 still make truthful label claims about 100-
20 percent organic ingredient content of their
21 product. It just does not have to be a
22 labeling claim category.

1 Right now, there are some products
2 that are not even eligible for the 100-percent
3 organic label claim, but they can claim 100-
4 percent organic ingredients because, you know,
5 all the ingredients are organic. You know,
6 there's processing aids that don't end up in
7 the final calculation. It's confusing because
8 the calc rules and calculation are not the
9 same as the description of the category. So,
10 you know, we just lose the whole thing and a
11 lot of the problem would go away.

12 If we are going to keep this
13 category, there should be a very clear bright
14 line. NOP gave us some guidance, like, two
15 years ago, and I thought it was good. I
16 thought it was very helpful at our certifier
17 training. Basically, if a product is
18 formulated or used or manufactured in any way
19 with a substance that's on 205.605 or is on
20 606 and is not organic, then it's not 100-
21 percent organic. It's got to be 100-percent
22 organic ingredients. And that does include

1 things like antimicrobial washes. It does
2 include, you know, things like inert gasses.
3 So, you know, that's another easy way to
4 enforce it, and it gives a very high standard
5 for what it all means.

6 I did give you more details in my
7 written comments. I think another breaking
8 line would be that materials used in crop or
9 livestock production for post-harvest handling
10 that are on the list for that use or natural
11 for that use. Those would be allowed as part
12 of the crop or the livestock production. Once
13 it goes to further handling off farm and is,
14 you know, washed or sanitized or, you know,
15 treated in some way, then it would lose its
16 eligibility. But as I said, you know, that's
17 getting into the weeds there.

18 I'd also like to say that in the
19 National Organic Coalition comments on grower
20 groups, there's a very good definition of
21 post-harvest handling. You might want to take
22 a look at that for future reference if you

1 decide to go that route.

2 Another problem with this paper,
3 which I would like you to pull back this
4 paper, is that it provides an implied
5 enforcement of the NOP policy statement on
6 food contact substances. I don't think you
7 meant to, but you opened a huge door into
8 another can of worms here, which is the whole
9 policy about antimicrobials washing, you know,
10 when does it have to be on the list and when
11 doesn't it? And I think that deserves a lot
12 more attention than you were able to do in
13 this review. So I just think you should
14 remove all that and just retest your thinking
15 there. And, in fact, in my comments, I gave
16 you a complete rewrite of your document, if
17 you just want to use it.

18 Number three, certifying
19 operations with multiple production unit sites
20 facilities, we remain concerned about the
21 general language in a number of places in this
22 document. We think it's greatly improved from

1 the last time around. It's very good on the
2 risk categories for grower groups, but still
3 we find that it's ambiguous. It still could
4 be interpreted to apply to handlers,
5 retailers, or any certified entity. I think
6 you should revise the document to make sure it
7 only applies to farmer/producer operations.
8 That was the theme of the vast majority of the
9 comments last time around, and I think that
10 your intent now was to move this forward for
11 grower groups. If you're going to take it up
12 separately, take it up separately. But don't
13 leave it ambiguous right now; I don't think
14 that's helpful.

15 Our concern that the proposed
16 changes in definitions, which are the only
17 regulatory changes you proposed here, would
18 have other ramifications not anticipated,
19 especially the narrow definition of "site."
20 In my reading, it says a site is an area where
21 production is managed. So, to me, it sounds
22 like you could go inspect the offices of a

1 company that has five different plants. And
2 just, by itself, that definition I think will
3 cause problems, so I think you need to think
4 about how that would impact.

5 Fourthly, out of five, policy and
6 procedures manual. Procedures to handle
7 technical reviews, I ditto what Brian said
8 about a need for independent reviews of
9 petitions by experts. And in your document,
10 I think you made an error on your procedure
11 because it's the NOSB, not the NOP, that
12 convenes the TAP. That's the language in the
13 OFPA.

14 So you do need to work closely
15 with the NOP to see that this happens. And if
16 you need help from the community to make this
17 happen, you should let us know, and we'll be
18 out there, you know, talking to people and
19 trying to make this happen or raising more
20 money or whatever there needs to be for the
21 Board to function properly. But it's really
22 an important function.

1 Well, it's legally debatable
2 whether NOSB can act as their own TAP. We ask
3 that if you do intend to provide in-house TAP
4 reviews and then the expertise of the
5 subcommittee that's doing it should be
6 documented. You also should be providing a
7 written review compiled of the review that
8 you've undertaken and indicate the reference
9 material consulted. Right now, the use of
10 current checklists may be adequate to document
11 the Board decision, but it does not substitute
12 for a TAP review. It requires that the Board
13 submit to the secretary the results of the
14 Board's evaluation and the evaluation of a
15 technical advisory panel for all substances
16 considered for inclusion on the National List.

17 So, you know, this is two
18 different things. You know, they're not just
19 one checklist. If there is no TAP review, I
20 think you're putting yourself at liability
21 because you do not have the separate
22 independent review.

1 As an example, when there are no
2 TAP reviews, we run into problems later down
3 the road. For instance, ethylene for pears,
4 that came up. Part of the reason you don't
5 know, the history was that all the prior TAP
6 reviews were not posted. I posted them in my
7 comments. They were considered comments,
8 which Claudia is going to present later, goes
9 through quite a detail on the whole ethylene
10 thing. It was considered, tomatoes was the
11 first thing that, you know, people wanted to
12 use that for, and that was always considered
13 off the table because, you know, the whole
14 point of organic is we don't have gassed
15 tomatoes that are not ripe we need to market.
16 There is a quality issue and an authenticity
17 issue I should say.

18 So I don't think that this, since
19 you didn't have a TAP review, I feel like you
20 didn't do justice. I think you should delay
21 that decision. It's just, you didn't have
22 complete information. In fact, that ethylene

1 petition itself wasn't posted until, like,
2 very late before the meeting. So I don't
3 think there's a good chance for everyone to
4 look at this.

5 Then the other point, as
6 illustrated by the petition on seaweed-derived
7 calcium, you're recommending to allow that
8 based on the fact that it's a natural form of
9 a mineral, which may be true, but the only
10 information we have is from a petition where
11 there's confidential business information that
12 is redacted. So how do you know exactly how
13 it's formed? How do we know how to evaluate
14 similar products? That should just be off the
15 table that you do not do a half review when
16 there's confidential business information and
17 we don't know how it's manufactured. So I
18 have one more point here.

19 CHAIRPERSON DELGADO: Your time is
20 up.

21 MS. ROSEN: Okay. Well, I have
22 one more point, but it's brief. Okay. The

1 status of petition materials on the web site,
2 I think, you know, this whole point about the
3 missing petitions and the ancient ones that
4 are surfacing and then the recent ones that we
5 don't know where they are is just a symptom of
6 needing -- and I know NOP is working on it,
7 and I know poor Valerie is trying to get it
8 all together, but we're willing to help. A
9 lot of us have historical information in our
10 files, but we really need a better method for,
11 like, when the petitions come in so that we
12 can have a long as period as possible to
13 collect information from the public. That
14 way, you'll get more and better diverse
15 information.

16 CHAIRPERSON DELGADO: Thank you.

17 Any questions? Hugh?

18 MR. KARREMAN: Thanks, Emily.

19 Just in regards to the TAP reviews, I tend to
20 agree with you that the fifteen of us on the
21 Board might not have the expertise to do
22 something, but then, again, we might. It

1 depends on the case. But your implication was
2 that third-party groups would have the
3 expertise. I tend to agree, at least with one
4 particular group I'm thinking of. But what
5 makes an expert an expert in reviewing things?
6 Are you scientifically trained as far as
7 agronomy, as far as medicine, as far as
8 livestock? Or is it you know the organic
9 rules really well? Or is it -- I don't know.
10 How do you --

11 MS. ROSEN: On OFPA, there's
12 criteria for technical expertise, and it lists
13 a number of fields like, you know, agronomy,
14 toxicology. I think there's four or five
15 different general categories listed there.
16 The Board previously and the Program has a
17 whole set of criteria for selecting
18 contractors and statement of work. I mean,
19 it's all been hashed out many times before.
20 But, yes, they should have good scientific
21 expertise. They should be able to address the
22 particular sector of the topic, you know, if

1 it's veterinary, if it's agronomy, whatever.

2 They should be able to demonstrate a range of
3 expertise.

4 There may be, you know, within the
5 USDA, there's probably some good science
6 people that can help out, too. I just think
7 there needs to be, like Brian was saying, an
8 expert review and then your stakeholder review
9 because it is inherent a little bit of
10 conflict when some of your members are doing
11 a review and then the other ones are supposed
12 to be questioning you about your review. I
13 mean, it's not necessarily the best setup.

14 CHAIRPERSON DELGADO: Joe,
15 followed by . . .

16 MR. SMILLIE: As far as the multi-
17 site document, your comments on that, I
18 thought we were fairly clear that right now
19 the document is mute on everything but
20 growers. That was the intention and if you
21 find language in there that doesn't meet that
22 intention, we'll be glad to take a look at it.

1 But right now it is mute on anything but
2 growers. It doesn't rule out possibilities in
3 the future, but that was the intention of the
4 committee at this point in time.

5 Second thing is I couldn't agree
6 more with you on the 100-percent. Just drop
7 the sucker. You know, cut the Gordian knot,
8 whatever you want to do it. We didn't come up
9 with that recommendation, but we'll be glad to
10 consider it, and maybe the Program will be
11 also. And we can save us a lot of pain going
12 through all the different details and just
13 drop it.

14 But that having been said, if that
15 doesn't happen, I would disagree with your
16 comments on the preclusion. I think that the
17 rule, the regulation is clear when it says
18 processing aid. And when I look at some of
19 these substances, let's say nitrogen flush,
20 that's not a processing agent. I think that
21 you can -- the CFRs are becoming, to me, to
22 appear like the Bible. You know, you can just

1 about get anything out of them you want. But,
2 to me, when you just judge overall what the
3 CFRs have to say, things like nitrogen flush
4 aren't a processing aid, and the regulation
5 says processing aids.

6 So I would like to push forward
7 with that particular part of it and not reduce
8 it to just inert gasses. We'll just drop the
9 inert part of it and just go with the gasses
10 because I think, you know, we're looking at
11 food safety issues that are important, and
12 we're looking at claims that are justified,
13 and I would just disagree with your
14 interpretation of the CFRs on that particular
15 set of issues.

16 MS. ROSEN: If I could respond
17 briefly, I think some of the gasses are used
18 to prevent oxidation in packaging. But in
19 that same definition of CFR, they're also used
20 as propellants or as, you know, like carbon
21 dioxide could be used as a carbonate. So
22 depending on the use, it may or may not be a

1 processing aid. I mean, there's no
2 distinction on the list. So I would say
3 that's fine, but you need to make a
4 distinction on the list of which things you
5 feel are not processing aids for which uses
6 because, otherwise, some people will be
7 allowing it in some 100-percent labels and
8 others will be allowing it in other human
9 products. You know, it's not clear.

10 CHAIRPERSON DELGADO: Kevin?

11 MR. ENGELBERT: Thank you, Emily.
12 I agree with your thoughts about the grower
13 groups being strictly for producers, and I
14 didn't get it from the document that that's
15 all it was for. So I do think there's some
16 tweaking needed there. But I'd also like some
17 comment from you about --

18 CHAIRPERSON DELGADO: Kevin, can
19 you say it on the microphone, please?

20 MR. ENGELBERT: Could you also
21 give some comment briefly about the parameters
22 for grower groups? We can't just go with

1 intent, I don't think. Where do we set the
2 limit for grower groups? Is it based on
3 income, size of the farm, number of
4 operations, the product? I don't remember
5 anything in your comments about that.

6 MS. ROSEN: I did support the
7 criteria that the CACC came up with. I think
8 they're a good start. It was contributed by
9 a lot of different groups, and I can see pros
10 and cons of the 5,000 K limit, but, you know,
11 I would not presume to know enough about how
12 those small holders operate. I do think the
13 intention is for small holders, but I'm not
14 sure what the best way to accomplish that is.

15 CHAIRPERSON DELGADO: Any other
16 questions? Thank you, Emily. Now we have
17 Gwendolyn Wyard, followed by Tim Redman.
18 Gwendolyn?

19 MS. WYARD: Good afternoon. I
20 believe I have a proxy, but I'm not so sure.
21 I don't see it up there. I have about seven
22 minutes.

1 MS. FRANCES: I think a lot of the
2 people who have a proxy, if they want to go a
3 second day. They want to go a little bit on
4 Monday and a little bit on Tuesday, that may
5 be the case.

6 CHAIRPERSON DELGADO: And members
7 of the Board, I urge you to consider coming
8 tomorrow. We have a lot of people ahead, and
9 if you are talking about a similar topic don't
10 hesitate to team up and come together. That
11 would be most effective and most productive
12 for us.

13 MS. WYARD: Thanks. My name is
14 Gwendolyn Wyard. I'm speaking today on behalf
15 of Oregon Tilth. We have over 700 members and
16 over 1200 certified clients. My position, I'm
17 the Processing Program Reviewer and Technical
18 Specialist, also known as the fermentation
19 expert.

20 So starting off with pet food, the
21 comments while submitted by Oregon Tilth were
22 actually written by my dog. We've been

1 attentively following the work of the Pet Food
2 Task Force since 2005, and she asked that I
3 personally come here and thank the Task Force
4 and the Board for the development of the
5 standards and that I point out a few technical
6 corrections that are needed, namely because
7 pet food standards were written prior to
8 205.606 changes and prior to the NOP
9 clarification on agricultural livestock feed
10 supplements and additives.

11 The proposed pet food standards
12 under 205.237, they imply that all
13 agricultural ingredients in the made-with
14 category must be organic. Number two, the
15 organic category, they do not provide an
16 exception for ingredients listed on 205.606.
17 And, number three, they don't specify whether
18 allowed supplements and additives under 603
19 need to simply be non-synthetic or whether
20 they need to be non-agricultural and non-
21 synthetic. This has been a very confusing
22 area in the livestock standards, and I want to

1 make sure we get it right in pet food
2 standards.

3 So after close examination, Wula,
4 the smarter-than-average dog, preferential
5 carnivore and occasional grazer, finds the
6 standards to be more akin to the regulations
7 for human food versus livestock. Combining
8 pet food with livestock under the same heading
9 is a recipe for confusion. She, and,
10 therefore, we, feel that petfood would be best
11 placed under its own section.

12 We suggested 205.240 in our
13 comments, but, at the time, Wula wasn't up to
14 speed with the proposed pasture regulations.
15 That spot is taken. But we believe that there
16 are 28 more sections reserved and open, so
17 let's talk about 205.241. The point is to put
18 pet food into its own section and then combine
19 that with the detailed composition standards
20 of 301.

21 Our suggested technical
22 corrections are spelled out in edit mode in

1 our written comments, and I'll be delighted to
2 answer any questions you have on those when my
3 five minutes are up.

4 Guidelines for the 100-percent
5 labeling claim, again, I thank the NOSB for
6 your work really on this doozy of a topic.
7 You have our six pages of written comments
8 complete with seven examples to demonstrate
9 our point. In short, we agree that materials
10 used on food contact surfaces and gasses used
11 for packaging applications should not affect
12 the 100-percent organic label. We disagree
13 that sanitizers used in produce rinses and
14 hydrocooling, as well as diatomaceous earth
15 used for post-harvest pest control, prevent
16 the product from being labeled 100-percent
17 organic. I might add that I asked my dog
18 about this, and she did just wave her paw and
19 say that 100-percent category is more trouble
20 than it's worth and trotted off after a
21 squirrel.

22 So the CACC Committee reasons that

1 the residue from pest control material or
2 sanitizer remaining on product is consumed as
3 part of the final product and is, in effect,
4 an ingredient, therefore disqualifying the
5 product from the 100-percent organic claim.
6 This line of thought does not account for how
7 and when the materials used. It ignores
8 classifications that are already in place by
9 the EPA, FDA, and USDA, and it does not take
10 into account how that now organic product will
11 then be factored into organic calculations.

12 With respect to labeling products
13 and determining the organic content of a
14 product, the regulations refer to ingredients
15 and processing aids only. Therefore, Oregon
16 Tilth's position is as follows: production
17 inputs, namely sanitizers and pest materials,
18 on agricultural commodities used during pre-
19 imposed harvest activity should not impact the
20 100-percent organic label. As supported by
21 the regulatory language in 301, loss of the
22 100-percent organic label occurs when a non-

1 organic substance is used during processing
2 and functions as a processing aid or as an
3 ingredient.

4 We run into the problem that the
5 heading on 605 and 606 refer to ingredients,
6 and all other remaining lists refer to crop
7 production and livestock production. So we
8 agree with OMRI's third and fourth options
9 that 205.601(l) could refer to post-harvest
10 handling and, the fourth, the heading of 605
11 could refer to substances. In other words,
12 strike the word ingredients, as several of the
13 materials on 605 are not ingredients.

14 There's a real void when it comes
15 to placing post-harvest pre-processing
16 materials. We are especially concerned that
17 the recommended guidance doesn't account for
18 how the organic content of a product is
19 calculated. The recommended guidance would
20 result in the revision of hundreds upon
21 hundreds of certificates. Most raw fruits and
22 vegetables would lose their 100-percent

1 organic status prior to being processed. Farm
2 certificates, which historically have been
3 viewed to represent 100-percent organic raw
4 products, would need to specify organic. And
5 the products listed would then need to be
6 defaulted to 95-percent organic when I'm
7 running calculations.

8 So how do we go back? How do we
9 know what the percentage -- how would you
10 calculate the percentage, especially if you're
11 pointing to pest materials and sanitizers as
12 ingredients? We would have to figure out how
13 to calculate those into products, and that
14 would be very problematic.

15 This is a significant divergence
16 from the understanding and practices the
17 industry has built itself around for the past
18 ten years, and we ask that the Committee
19 please reconsider their guidance on this
20 extremely important issue. Thank you.

21 CHAIRPERSON DELGADO: Questions?

22 Tracy, followed by John.

1 MS. MIEDEMA: Thanks Gwen. I have
2 a question for Deputy Administrator Robinson
3 while Gwen is up here. You made some
4 excellent technical corrections to the organic
5 pet food recommendation, and this comes up
6 from time to time where a correction comes at
7 just the right moment. Our typical way of
8 dealing with this in committee is to have sort
9 of a midnight scramble of redlining
10 recommendations, putting the audience through
11 a painful exercise of onboard editing, and
12 then voting on the edited either slightly or
13 significantly edited version.

14 And just from a process
15 standpoint, if we have a recommendation, plus
16 some excellent written comments, does the
17 Program layer those together? Can you just
18 take that forward, or should we continue with
19 our midnight scramble inserting of important
20 edits?

21 MS. WYARD: Or can I put my work
22 on Valerie's computer and your computer and --

1 MS. MIEDEMA: And a follow-up,
2 just to continue, you know, I know that type
3 of thing is possible. And taking into account
4 that we need to mete out what we feel really
5 should be taken and added to the
6 recommendation and what shouldn't. But I
7 guess the follow-up there is that on a
8 question like where should organic pet food
9 reside in the regulation, that's ultimately
10 going to be a programmatic decision. And so
11 what I guess I'm trying to make sure we do is
12 we don't spin our wheels when we shouldn't be,
13 yet we give you the best possible data to work
14 with.

15 DR. ROBINSON: The most important
16 thing is that we get a clear recommendation
17 from you, you know. That it's not just a
18 question of we get the Board's recommendation
19 and then we get a bunch of, oh, but then we
20 got these suggestions and these suggestions,
21 so we have addendums to that so that we're not
22 sure what is it you want us to add to your

1 recommendation.

2 So the most important thing is
3 that whatever you give us it's clear to us
4 what it is you are recommending and why.

5 There's not really any ambiguity there. We're
6 not getting something that says, okay, we want
7 the labeling like this and then there's option
8 A, option B, and option C. Otherwise, we're
9 just going to keep coming back to you and
10 saying, why did you do this? What is it you
11 want?

12 It's not the format that you give
13 it to us in. I don't care if it's hand-
14 scratched. I care that it's clear is what I'm
15 saying.

16 CHAIRPERSON DELGADO: And the
17 highlight then, the highlight is to make sure
18 that a committee, when they're proposing a
19 recommendation that their intentions are
20 clear, so the Board is given time and will be
21 able to vote on a clear intent., and then send
22 that out.

1 We have Joe. Sorry. We have
2 Tracy. Tracy is going to follow up with a
3 comment.

4 MS. MIEDEMA: Just to add that to
5 my colleagues that worked on the Organic Pet
6 Food Task Force, we really do need to insert
7 these recommendations and per Barbara's advice
8 just now, so let's talk after today.

9 CHAIRPERSON DELGADO: On the basis
10 of procedure, we do have the time available.

11 If you feel uncomfortable with your
12 recommendation, you can always withdraw that
13 or work on it sometime tonight and present a
14 different updated version. It's really up to
15 the committee. Follow-up from Bea.

16 MS. JAMES: This is just a quick
17 comment to that. I think I've heard Barbara
18 say in the past it's better to do it right
19 than to do it fast.

20 CHAIRPERSON DELGADO: Any other
21 questions? Joe?

22 MR. SMILLIE: Personally, I agree

1 with your comment. I think your comment on
2 the 100 percent are good, and I would like to
3 take those forward with our committee.

4 Back to the issue of get it right,
5 the problem with our organization is we can't
6 meet in a week, get the recommendation fixed
7 and the move it forward. You know, it's going
8 to be delayed for a sizable period of time.
9 So that's a conundrum we face.

10 At the risk of, we opened the food
11 contact substances box, and we'll try and
12 close it as quickly as possible. Agreed with
13 that. But the difference between, again, I'm
14 not sure that the entire audience or the
15 community understands the two issues that you
16 brought up. There's a difference, at least in
17 my understanding, between the 100-percent
18 claim and the calculation. And you put them
19 together saying that if we take away the 100-
20 percent claim language that it will cause you
21 and me and every other certifier in the room
22 untold hours of work working on calculations.

1 You can have an organic product that is 100
2 percent but can't use the 100-percent claim,
3 right?

4 MS. WYARD: It could contain a
5 non-inorganic processing aid, so it can't be
6 labeled as 100-percent organic, but it
7 contains 100-percent organic ingredients in
8 Section 302, the first two ingredients. So I
9 think I can speak for, well, I'll speak for
10 Oregon Tilth, the way that we've been doing
11 calculations for years and years and years, we
12 calculate ingredients. We don't calculate
13 processing aids.

14 MR. SMILLIE: So how would this
15 recommendation affect the calculations game?

16 MS. WYARD: Well, now, because we
17 have clarification from the program, when
18 we're doing calculations, the only way that
19 we, you know, the formulation has 20-percent
20 of an organic ingredient, unless I know the
21 actual percentage of that ingredient, I'm
22 going to take 20 percent times 0.95. Now, if

1 my client wants to track down the actual
2 percentage, which is 97, now I'm going to take
3 0.97. Well, by that time, it's the 20
4 percent.

5 But the supply chain, if it's
6 losing it's 100-percent label category, the
7 certificates represent the label category. So
8 I'm going to be sitting with a certificate
9 that says organic, and now I'm going to go
10 back to my client and say I need you to tell
11 me what the actual percentage is, or we can
12 just default to 95. There are going to be raw
13 agricultural commodities that, for years in
14 their formulations, have been factored in at
15 100 percent because they're single-ingredient
16 raw agricultural commodities.

17 So it's just going to put
18 everybody into this mode of having to chase
19 down the actual percentage based on the use
20 of, perhaps, a pest control material used in
21 a grain silo. That type of information is
22 never going to make it into a formula.

1 MR. SMILLIE: And I don't think it
2 would. I think that if you look at the
3 product profile, it will say apple, not apple
4 with, you know, chlorine on it or wheat with
5 one speck of diatomaceous earth on it. So it
6 will lose, perhaps, it's 100-percent claim,
7 but it won't lose the 100 percent of the
8 calculation.

9 MS. WYARD: I mean, with processing
10 aids, you still consider them 100-percent
11 organic ingredients, but part of the proposal
12 that you're putting out there is that you're
13 saying, well, there's residue, so they're kind
14 of, in effect, ingredients. That's really
15 problematic. They're not ingredients.
16 They're not regulated as ingredients.

17 MR. SMILLIE: That's certainly not
18 the intention of the recommendation.

19 MS. WYARD: So, I mean, if you
20 were to go down the path of saying if it comes
21 in contact, and we don't care if it's during
22 washing, before processing, after processing,

1 it loses the 100 percent because it is used
2 on, it comes in contact. Don't talk about
3 ingredients. That way, we know, okay, it
4 can't be labeled as 100-percent organic, but
5 at least for calculation purposes we can use
6 100 percent if the only thing that's been used
7 is the sanitizer and wash.

8 CHAIRPERSON DELGADO: Julie?

9 MS. WEISMAN: Can we conceive of
10 the possibility, along the lines of making the
11 distinction of losing the labeling category as
12 far as retail products go without sacrificing
13 what currently happens on certificates?

14 MS. WYARD: You know, you go on
15 the products, you go down the shelves in the
16 grocery store, there is very few products that
17 use that 100-percent label. It's the
18 calculation part that you're going to lose it
19 on the certificates.

20 MS. WEISMAN: Does it help to
21 separate those out?

22 MS. WYARD: Yes. I mean, we're

1 already in a situation now where we have to
2 figure out a better way to communicate,
3 certifiers communicate to one another,
4 operations communicate, getting that
5 percentage passed on forward so that everybody
6 is not in this chase-down game. I mean, if we
7 had known from the very beginning about the
8 clarification on calculations, we would have
9 put our certificates together differently. We
10 would have had that percentage right there.

11 I mean, I say throw out the 100
12 percent -- this is Gwendolyn Wyard -- throw
13 out the 100-percent category and just put the
14 percentage, the ingredient percentage on the
15 label. That tells the consumer, you know, 97-
16 percent organic. That's straightforward. But
17 I think we run in -- you know, throwing away
18 the 100-percent category, from a consumer
19 perspective, so they hear that, you know, the
20 NOSB, NOP, it was too hard; we just threw out
21 that 100-percent category all together, that's
22 going to be, that's --

1 CHAIRPERSON DELGADO: Any other
2 questions?

3 MS. WYARD: I thank you for your
4 time.

5 MR. ENGELBERT: You're saying that
6 feed grain has been running to a bin and has
7 had diatomaceous earth added to it loses its
8 100-percent organic status. What's the
9 implication then? Because livestock had to be
10 fed 100-percent organic feed.

11 CHAIRPERSON DELGADO: Can you
12 repeat the question?

13 MR. ENGELBERT: If we say that
14 100-percent, that livestock have to be fed
15 100-percent organic feed, but you say in your
16 recommendation that grain has been treated
17 with diatomaceous earth will lose its 100-
18 percent organic status, how are you going to
19 resolve that conflict?

20 MR. SMILLIE: Again, it's 100-
21 percent claim, not 100 percent. You've got to
22 understand there's a 100-percent claim, and

1 then there's 100 percent. So grain does not
2 lose its 100 percent. It's still 100 percent,
3 but you couldn't sell it retail as 100-percent
4 organic because the so-called processing aid,
5 which Gwen and I do not believe is a
6 processing aid but a pest-control material,
7 would preclude it from the claim but not the
8 calculation. It would still be 100 percent to
9 a dairy farmer.

10 CHAIRPERSON DELGADO: Dan?

11 MR. GIACOMINI: The regulation
12 right now says that agricultural products
13 included in diet must be organic. The 100
14 percent is really not the issue, whether it's
15 the agricultural product is a certified
16 organic product. So, I mean, there would be
17 legitimate and illegitimate things you could
18 do to it, but that doesn't change the organic
19 nature of the agricultural product.

20 CHAIRPERSON DELGADO: Richard?

21 MR. MATTHEWS: You know, I've
22 answered this question somewhere in my history

1 with the program, and I know that, in fact, I
2 told Tom Hutcheson probably less than a year
3 ago that something like diatomaceous earth or
4 the carbon dioxide used for pest control in a
5 grain bin would not disqualify the grain
6 product from being considered as organic in a
7 100-percent organic product. In other words,
8 you could still label a product 100-percent
9 organic even if the wheat in there had had
10 diatomaceous earth in the grain bin. That's
11 no different than any of the other synthetics
12 that are on your list for pest control.

13 So pest control in the field, pest
14 control in the grain bin, what's the
15 difference? I mean, we're not going to say
16 that a cherry pie made with 100-percent
17 organic ingredients that didn't use any
18 synthetic processing aids couldn't be called
19 100 percent because it had an allowed
20 pesticide used on the strawberries, nor would
21 we say that for the wheat that's used to make
22 the pie crust. I mean, that's my position on

1 it.

2 MS. WYARD: That's Oregon Tilth's
3 position, too. There you go.

4 CHAIRPERSON DELGADO: Thank you.

5 MS. WYARD: Okay. Thank you.
6 Thank you very much.

7 CHAIRPERSON DELGADO: Up next, we
8 have Urvashi Rangan.

9 MS. RANGAN: This is going to be
10 the first fish demonstration in a NOSB
11 meeting. First demonstration ever. Good
12 afternoon. I'm going to take this off so you
13 don't stare at it and not listen to me, but
14 I'll leave it right here.

15 Good afternoon. My name is
16 Urvashi Rangan. I'm a Senior Scientist and
17 Policy Analyst with the Consumers' Union.
18 We're the non-profit publisher of Consumer
19 Reports. And I'm here today because we're
20 extremely disappointed with the
21 recommendations on the aquaculture standards,
22 and they fall significantly short of consumer

1 expectations. You've heard me up here before.
2 I'm going to go into a lot of those details
3 again. We've run another national poll out
4 this November with similar statistics to the
5 one we ran in June 2007.

6 We acknowledge the years of work
7 that have gone into this and that organic
8 aquaculture needs different standards than
9 other livestock. But we feel the
10 recommendation a year ago was closer to what
11 it needed to be than the recommendation that's
12 come out for this meeting.

13 These recommendations do not meet
14 the same bar for other organic livestock
15 production. In fact, it's a lower bar, which,
16 if enacted, will compromise organic quality
17 and value and undermine consumer confidence,
18 not only in the organic fish that they buy but
19 in all the organic products that are out on
20 the market. This is a significant deviation
21 from what organic principles are and where the
22 bar ought to be.

1 You acknowledge in the
2 recommendation that consumers may not want
3 organic fish to eat wild fish and propose an
4 additional conditional organic label to
5 differentiate certain fish from others. That
6 violates Section 2102 of OFPA that ensures
7 that organic production meets the consistent
8 standard. You cannot alter that label just to
9 differentiate a different production system.

10 Allowance of the 25 percent wild
11 fish for fish meal fails to meet consumer
12 expectations on multiple levels. It doesn't
13 adequately address the contaminant issue. In
14 June 2007, more than 90 percent of consumers
15 in our poll said that they wanted organic fish
16 to be free or low in contaminants.

17 Moreover, the 25-percent level may
18 also compromise the nutritional value of that
19 particular fish and not actually make it
20 nutritionally equivalent to its conventional
21 counterpart. It falls short of the 100-
22 percent organic feed requirement. Our

1 November 2008 poll, and I'll be happy to
2 provide those details and written comment,
3 show that 93 percent of consumers agree that
4 organic fish should be produced with 100-
5 percent organic feed, like all organic
6 animals. This is what consumer expectations
7 are, and to deviate from that seriously
8 undermines the integrity of this label.

9 It also creates a far more
10 complicated and defensive strategy to manage
11 contamination and sustainability in fish meal.
12 And the recommendations tend to rely on vague
13 environmental principles and weak regulations
14 to address the problem, specifically Section
15 2107(a) that requires periodic residue
16 testing. That requirement is only once every
17 five years. That is an inadequate standard to
18 monitor contaminants in fish meal.

19 Sourcing from sustainable,
20 quote/unquote, fisheries that minimize
21 environmental impact, these are vague
22 principles, and we've seen what happened with

1 pasture when we don't have specific standards
2 in place. It's not meaningful as a standard.
3 There's no standardized definition of what
4 those mean, and it's subject to a wide array
5 of interpretations.

6 The stepwise decrease of fish meal
7 also produces an unnecessarily complicated
8 management system for fish meal. If you stick
9 to the 100-percent organic feed requirement,
10 you create clean channels for organic fish
11 meal to be produced, and when there is enough
12 for carnivorous fish to eat 100-percent
13 organic fish meal you have a nice clean
14 production channel. This stepwise decrease is
15 really going to unnecessarily lead to more
16 complication, and we don't think it's a
17 feasible strategy.

18 Consumer confusion over this issue
19 is summed up in your proposal under 205.612
20 that creates a gross exception by allowing the
21 use of a prohibited material in all of these
22 cases. It's very confusing to a consumer that

1 you are going to allow a prohibited material,
2 up to 25 percent of it, for use in organic
3 fish meal.

4 Finally, we want to comment about
5 the wild fish amendment and the fact that that
6 seems to be in play. National Organic
7 Program, you haven't promulgated on this, and
8 the public has not had an opportunity to
9 comment on wild fish. We don't understand why
10 it's in play if it isn't promulgated. When we
11 ask about you regulating fraudulent organic
12 fish claims, we were told, that hasn't been
13 promulgated. We can't regulate fraudulent
14 claims. Well, we can't cherry-pick what we
15 can push forward from the OFPA that hasn't
16 been promulgated and what hasn't.

17 And for all of these reasons,
18 including the environmental pollution reasons,
19 which I will defer to Food and Water Watch and
20 CAAR, we believe that fish that are not fed
21 100-percent organic feed, that come from
22 polluting systems, that may be contaminated

1 with mercury and PCBs, and may be
2 nutritionally-inferior to their conventionally
3 wild counterparts, don't add up to an organic
4 label on fish that consumers want. We also
5 respectfully submit 16,000 signatures to you
6 that echo the same sentiment from consumers.
7 Thank you.

8 CHAIRPERSON DELGADO: Questions?
9 Hugh?

10 MR. KARREMAN: Thanks, Urvashi.
11 We are listening to all public comment, of
12 course, very closely. And you didn't have a
13 written one, did you, this time?

14 MS. RANGAN: I'm sorry. I didn't
15 have time, but I will be submitting it during
16 this session, which, Valerie; is that correct?
17 You can enter it in the docket here.

18 MR. KARREMAN: I didn't want to
19 have missed it. Regarding the amendment in
20 OFPA that it's not been promulgated -- I can't
21 say that word too well. Sorry. But wouldn't
22 this regulation that we're trying to possibly

1 pass be the promulgation of that in the act?

2 I mean, everyone says that it has not been
3 initiated. This is the initiation of that
4 amendment.

5 MS. RANGAN: If that is the case,
6 I think, one, it's very slippery, and pardon
7 the fish pun. But, secondly, I do not read
8 this as being a promulgation of the wild fish.
9 If that's what it is, that's news to me and I
10 think it's news to the public. Wild fish, if
11 wild fish can then be certified as organic, I
12 haven't read that in any of the
13 recommendations.

14 MR. KARREMAN: No, we're not
15 saying that. We're saying wild fish can only
16 be used as feed in a decreasing manner over
17 ten years I think it is, and that's it.
18 There's going to be the byproduct of the wild
19 fish that's already in the human food chain.
20 We're using byproducts of that and not letting
21 them go to waste. That's the wild. That's
22 how we're seeing this part of the act, the

1 increment, not as fillets. Never have wild-
2 caught certified organic fillets. Never,
3 never. Just so you know that.

4 MS. RANGAN: So just to respond to
5 that, that part of the act is two sentences,
6 I think, and says something about wild fish to
7 be eligible to be labeled as organic. You
8 can't splice that thing or split it into two
9 and say we're only dealing with half of that
10 statement for fish meal and not deal with the
11 rest of it. If you're saying it's the basis
12 for a rationale that you're using in
13 promulgating these regulations and in making
14 your recommendations, then that needs to be
15 promulgated and needs to be publically debated
16 first, so we can figure out if that's really
17 a reasonable ruling of that particular part of
18 the act. We haven't done that yet. That
19 hasn't gone under public debate. And to use
20 this to debate that I think is disingenuous.

21 CHAIRPERSON DELGADO: Any other
22 questions? Bea?

1 MS. JAMES: With all the consumer
2 feedback that you received, I hear in your
3 comments that the consumers were really
4 concerned and not supportive of the idea of
5 wild fish being used as a feed for certified
6 organic fish. So I also was wondering if, in
7 any of the comments that you received, if
8 there was any feedback around environmental
9 issues? That all of the wild caught salmon
10 for our purposes is one thing, but what about
11 the wildlife and what would that do to the
12 wildlife?

13 MS. RANGAN: Thanks for asking,
14 Bea, and I had the one-minute mark-up, and I
15 didn't really get to that point. But
16 environmental pollution is very present on
17 consumers' minds. They buy organic because
18 they think that environmental standards are
19 being considered and that the highest
20 environmental standards are being enacted.
21 And, in fact, over 90 percent of consumer
22 response, both on a June 2007 poll as well as

1 the November 2008 poll, say that they do not
2 want to buy organic fish that comes from
3 systems that pollute, especially in the open
4 ocean.

5 MS. JAMES: Yes, the pollution,
6 but also just the depletion for, say, you
7 know, the wildlife in Alaska, Canada?

8 MS. RANGAN: We didn't ask
9 consumers that specific question, but the
10 answer to that really lies with the scientific
11 body of evidence. And I think groups like
12 CAAR and Food and Water Watch are going to be
13 able to share and have shared those scientific
14 studies. In fact, even at the aquaculture
15 symposium we were all at last year, it was
16 very evident that the ramifications of open
17 net pens in the ocean lead to many, many, many
18 problems, including depleting the wild stocks
19 around them, including sending disease and
20 parasites out into the ocean. We don't want
21 a toilet flush going on in organic production.
22 It shouldn't be that way. It should be in

1 closed controlled systems where you can
2 control the inputs and the outputs. That's
3 what all other livestock are held to. It's
4 what consumers expect of that standard.

5 CHAIRPERSON DELGADO: Any other
6 questions?

7 MR. KARREMAN: As far as the net
8 pens go, essentially what you just talked
9 about, you know, aren't land-based
10 agricultural animals also penned in? Aren't
11 there discharges from farms, whether they're
12 organic or conventional? Hopefully, less from
13 organic. Aren't they breathing the air that's
14 coming in from upstream or whatever? I mean,
15 you know, there are parallels.

16 MS. RANGAN: You know, there are
17 some parallels here, we can say, look, they
18 all share the same air, and the air goes in
19 and over and out. But there are scientific
20 studies that show massive adverse effects to
21 wild populations. If you look at farm salmon
22 -- I can't even speak anymore -- salmon farmed

1 alone from open net pen systems, there are
2 several cases where that intensive farming has
3 crushed immediately into the ocean,
4 disaffecting up to 90 percent of the wild
5 populations around it. That doesn't happen in
6 other livestock farming. And I think when
7 you're talking about water systems, you're
8 talking about a very different system. That's
9 why it took so long to come up with these
10 standards because it isn't a cow swimming in
11 water. These are very different. But in
12 terms of controlling as best you can the
13 environmental pollution that stems from it,
14 you've got a big problem on your hands if this
15 recommendation goes through the way it is.

16 MR. KARREMAN: Can I --

17 CHAIRPERSON DELGADO: Hugh?

18 MR. KARREMAN: Is this okay?

19 CHAIRPERSON DELGADO: Yes.

20 MR. KARREMAN: So even with the
21 proposal that stands -- you know, I think a
22 lot of people have a lot of problems with the,

1 you know, so far with the organic potential of
2 aquaculture because everyone is basing
3 everything on the conventional salmon industry
4 and what's gone so wrong with it. In our
5 proposal, is it the exact same? I think our
6 proposal has a lot tighter standards in it for
7 the environment and a lot of other factors.
8 And I just feel that a lot of people are just
9 knee-jerk reflexively opposed to it because
10 the conventional salmon industry and, you
11 know, I don't think we've almost been given a
12 fair shake in a sense. I mean, I think a lot
13 of the people out there haven't even read the
14 document. They're just like, can't do it.

15 MS. RANGAN: It's a great
16 question. I mean, are you doing something
17 better than conventional? Sure. Are you
18 doing something that meets the high bar for
19 organic? You're not. And I think that's
20 where the crux of this issue comes into play,
21 which is it doesn't go without question that
22 everything should qualify to be organic. And

1 in this particular case, the line really does
2 seem to be clearly drawn in terms of the fish
3 production where these open net pen systems
4 that flush their waste directly into the
5 ocean, they may not be as loaded up with
6 antibiotics, perhaps, as conventional farms
7 but still cause problems. And they are not in
8 line with what organic principles are.

9 And so our response to you, Hugh,
10 is it may be better, use another label for it.
11 It's not organic.

12 MR. KARREMAN: One last thing.
13 It's always focusing on salmon. What about
14 the fellow who's out in Hawaii that's come
15 here a couple of times, Neil Sims, and his net
16 pen system out there? Is that just as
17 hellishly bad as the salmon?

18 MS. RANGAN: Salmon illustrates
19 the problem. We think those production
20 systems are wrong for any kind of fish. I
21 think salmon is talked about a lot. It's
22 obviously one of the most highly-consumed

1 fish. But it only illustrates the fact that
2 those open net production systems don't jive
3 with organics.

4 CHAIRPERSON DELGADO: Any other
5 questions. Okay. Thank you very much.

6 MS. RANGAN: Thank you.

7 CHAIRPERSON DELGADO: At this
8 point, we are due for a 15-minute break. The
9 Vice Chair is correct. We were due for a
10 dinner break. We will continue. I also would
11 like to encourage the remaining speakers, we
12 still have a long list. We're not even
13 halfway. If you can please team up. I notice
14 the number of speakers with concerns of
15 agriculture, if you can team up. The same
16 with multi-site. We do have still some work
17 to do ahead tonight, and we appreciate your
18 cooperation.

19 We're going now for a ten-minute
20 break, and we're coming back at 25 after.

21 (Whereupon, the foregoing matter
22 went off the record at 5:11 p.m. and went back

1 on the record at 5:28 p.m.)

2 CHAIRPERSON DELGADO: We'll start
3 with public comment again with Mr. Dick
4 Martin. Please proceed. Five minutes.

5 MR. MARTIN: My name is Dick
6 Martin. I'm with Martin International
7 Corporation, a seafood import/export company.
8 I'm educated as a marine biologist and have
9 been in the aquaculture industry for 30 years.
10 I'm commenting on aquaculture standards
11 tonight.

12 At the outset, it's my
13 understanding that the new recommendation by
14 the committee of the Board must present a
15 viable model on both practical and economic
16 scale. This must be made as a basic premise
17 if we're able to complete the recommendations
18 and move forward on this.

19 The latest recommendations, in my
20 opinion, are close, so close, but still
21 slightly impossible as they're written. The
22 proposal, as written, places burdens on the

1 aquatic system that aren't necessarily shared
2 terrestrial systems and should be parallel and
3 equitable to them.

4 In particular, on net pen issues,
5 the proposed zero impact by predators is
6 idealistic and untenable. We can seek to
7 mitigate any impact, yet no one can guarantee
8 the elimination of it. The language should be
9 changed to include direct impact and eliminate
10 unrealistic to zero impact.

11 Two, the proposed requirement to
12 guarantee the recycling of 50 percent of all
13 nutrient input is equally idealistic and
14 untenable. The fact that one cannot obtain
15 really reliable and accurate qualitative and
16 quantitative data reduces that value, the
17 value that variable as a sole determinant of
18 environmental impact.

19 The recommendations should
20 consider the ability of the local ecosystem to
21 assimilate the portion of the nutrient input
22 without which the proposal remains flawed and

1 unfair. Nutrient input is a single variable
2 of environmental impact. Benthic analysis
3 must also be included. I suggest the Board
4 examine the parameters and techniques utilized
5 in the study, Eutrophication Assessment of
6 Scottish Coastal Waters Supporting Aquaculture
7 presented at the OSPAR convention at the Hague
8 in 2006 and include that technology in the
9 type of analysis when considering the totality
10 of an environmental impact. The key is to
11 work within a similar capacity of the local
12 ecosystem, which demands a case-by-case
13 analysis and eliminates an idealistic one-
14 size-fits-all concept that's currently in the
15 recommendations.

16 Regarding the feed
17 recommendations, point one, determining the
18 definition of sustainability is clearly one of
19 the most difficult challenges of this process,
20 the one facing the industry at large. The
21 various terms used in the paragraph are
22 excellent considering elasticity of the

1 definition. It should be expanded to include
2 the terminology managed responsibly, as to
3 avoid conflicting opinion in the field between
4 governmental and private organizations.

5 Two, the proposed limits of fish
6 meal and fish oil in the recommendations are
7 also idealistic and untenable. Provision must
8 be made to eliminate arbitrary requirements
9 that do not take realistic biological and
10 economic variables into consideration.

11 Third, the recommendations
12 limiting feed ratios and establishing FCRs for
13 cultured species should not be held to a limit
14 below the values established for similar
15 species in the wild. Conservation of forage
16 fisheries for use as feeding cultured aquatic
17 species should be of a primary importance, yet
18 the allowance of fish meal and oil in
19 terrestrial models should be outlawed before
20 limiting the use in aquatic models with the
21 health benefits to the human consumer are
22 preserved and maximized.

1 Additionally, I would like to be
2 on record as supporting the various amendments
3 and changes proposed by the AWG which modify
4 the Livestock Committee's proposal. The
5 changes proposed by the AWG modify the
6 recommendations to the extent of becoming
7 workable on all levels on a real-time basis.

8 Finally, I urge the NOSB to reach
9 a tenable and workable conclusion at this
10 meeting to ensure final rule-making on
11 aquaculture standards that will proceed
12 without further delay. Thank you.

13 CHAIRPERSON DELGADO: Any
14 questions? Okay. Thank you very much. Up
15 next is Douglas Low, followed by Tony Ruccio.
16 Tony is not here. We can count him out.

17 MR. LOW: My name is Douglas Low,
18 and I'm Managing Director of EWOS Scotland,
19 and I thank you for this opportunity to
20 comment on the proposed aquaculture standard.
21 EWOS is a global aqua-feed manufacturer. The
22 EWOS Scotland makes feed mostly for salmon,

1 and 15 percent of our output, about 8,000
2 tons, is compliant with organic standards set
3 by European private standards bodies, such as
4 Soil Association; OFF, Organic Food
5 Federation; ABW; and Natural Land. We've been
6 active in organic sector for ten years and are
7 committed to further growth a significant
8 niche market for smaller farmers.

9 We would like to contribute to the
10 development of a workable U.S. organic
11 standard that would include salmonids. It
12 should allow for viable production of healthy
13 salmon, fit with the principles of organic
14 movement, and meet the concerns of
15 environmentalists and consumers.

16 As the proposed standard stands,
17 it would not be possible to produce organic
18 salmon, but we believe that the standard could
19 be changed in a way that would be possible to
20 include salmon farming and remain true to
21 organic principles.

22 I've got four things I'd like to

1 comment upon, and that is the acceptability
2 criteria for wild fisheries used for fish meal
3 and oil, permitted levels of fish meal and
4 oils, on contaminants, and on nutritional
5 requirements of salmonids.

6 As it stands at the moment, few
7 feed forage fisheries meet the proposed
8 criteria with regard to stock health and level
9 of exploitation. The need for sustainability
10 is recognized by stakeholders, and fisheries
11 are being managed more responsibly. And when
12 they are, we see stock health improvements or
13 recovery. It's going to take time, and it
14 will be universal.

15 What we see is an alternative
16 approach which we would advocate, and that is
17 the preferential and unrestricted use of
18 trimmings, meals, and oils. These are the
19 byproducts of fish for human consumption. The
20 Aquaculture Working Group has also recommended
21 this. It's a sensible use of a valuable
22 resource, given the convention-efficiency of

1 fish. It's preferable to use these materials
2 in aquaculture, rather than pig production or
3 pig food. It does not increase pressure on
4 feed fisheries. It differentiates organic
5 from conventional. It is sustainable if the
6 source fisheries are responsibly managed.

7 Here are some examples of the
8 status of feed fisheries, and we could see
9 that there are some fisheries, such as
10 Atlantoscandian herring and Icelandic herring
11 that would provide trimmings which meet
12 requirements for being sustainable. In our
13 industry, we do a lot of work in assessing the
14 status of fish stocks that we use. And,
15 basically, we try to responsibly source
16 materials.

17 Next slide, please. The nutrition
18 of salmonids is well understood, and it will
19 soon be possible for the aquaculture industry
20 and salmon farming to be net producers of
21 marine protein and oil. We know that salmon
22 can be reared on very low levels of fish meal

1 and oil, certainly less than ten percent, but
2 it requires the use of, for example, synthetic
3 amino acids, solvent extraction of plant
4 materials, and in the end product, in the
5 fish. All of the three is very limited.

6 We can't do this in the organic
7 confined diets without compromising growth and
8 health. Organic plant materials for feed are
9 limited in range and availability. It will
10 improve over time, but it will take several
11 years. We suggest step targets for plant
12 inclusion is an option that should be
13 considered.

14 Fish meal and oil is highly
15 digestible, and while excessive inclusion of
16 plant materials results in increased
17 environmental impact. Please note that the
18 achievable minimum of fish meal and oils is
19 about 70 percent.

20 On contaminants, North Atlantic
21 fish do accumulate contaminants, and this ends
22 up in meals and oils. Aquaculture is a

1 victim, not the cause. The fish meal industry
2 has developed cleaning technologies and
3 monitoring regimes, but these, in some cases,
4 are not organic compliant. We, ourselves,
5 wanted to monitor 14 environmental
6 contaminants regularly. And it is possible to
7 remove most contaminants, not all. In the
8 finished article, the fish are found to have
9 levels well inside EU regulatory limits.

10 You need to clarify the wording of
11 the proposal again. The aquaculture working
12 group has made these points, and that is we
13 can remove most contaminants but not all.

14 Finally, on nutritional
15 requirements of salmon, omega-3 and astaxanthin
16 are accumulated from the natural diet in wild
17 fish. They're essential in certain stages of
18 the life cycle but not all. They bring
19 significant health benefits to consumers and
20 should not be restricted, and a change of
21 wording in the proposal would be necessary.

22 I hope that this contribution will

1 help you in development of a workable standard
2 that does include salmonids. Thank you.

3 CHAIRPERSON DELGADO: Any
4 questions, please? Up next, we'll go past Tony
5 Ruccio who is not here, and Grant Cumming,
6 followed by Dick Martin.

7 MR. CUMMING: Hello. My name is
8 Grant Cumming. I'm representing Grieg Seafood
9 Hjaltland UK Limited. I would like to thank
10 the Standards Board for the opportunity to
11 make a representation today. We are a part of
12 a Grieg Seafood Group. We are the third-
13 largest producer of Scottish-farmed salmon,
14 and we are the largest UK producer of organic
15 salmon.

16 We are an integrated farming
17 company with processing and sales facilities,
18 as well. And we are certified organic salmon
19 by the Organic Food Federation, and the
20 Natural Land European Standards.

21 This is just a little background.
22 This is where we're based, off the North Coast

1 of Scotland, famous for Shetland ponies,
2 Shetland sheepdogs, and I hope soon in the
3 U.S., as well, for Shetland organic salmon.

4 I want to comment today on the net
5 pens and related management issues. In
6 general, I would like to say that we're very
7 happy with the general approach. It seems to
8 be based on planning and risk assessment, and
9 that fits in very well with the organic
10 certification in the EU as it stands just now.

11 What you're probably all aware of
12 is that the same process that's currently
13 happening inside the European union. And
14 within the next I would guess three to four
15 months, we will have aquatic organisms organic
16 standard for Europe, as well. And I would
17 urge yourselves, as I've urged the European
18 standard makers, just to consult with each
19 other, hopefully to make sure that we don't
20 build any unnecessary contradictions into the
21 two schemes.

22 Next slide please.

1 I'll take a little moment to go
2 through one or two specific points. On the
3 aquatic livestock health, I've got to say that
4 the standards are challenging, but we're up
5 for it. We're going to give it a go. And
6 what I do need to say is it looks like the
7 standards with regards to the therapeutics are
8 going to be quite a bit tougher than the
9 European standards. Now, we'll still give it
10 a go and try and produce salmon to your
11 standards, but it will probably affect the
12 volume and the supply to the marketplace. But
13 it becomes exceedingly important for us that
14 the U.S. standards are harmonious with the EU
15 standards. That there are no contradictions
16 that prevent a supply in U.S. markets while
17 meeting the EU standards.

18 On the aquatic living conditions
19 sanction, I noticed that you're restricting
20 the use of non-organic aquatic animals in the
21 facilities to species either native to the
22 environment or unable to breed successfully in

1 the environment. Now, it may be a given or I
2 may have missed it somewhere, but I didn't see
3 that for the actual organic species
4 themselves. And I would suggest that what we
5 should be looking to do is to produce native
6 organic species in native waters. So I would
7 suggest that we're not trying to produce
8 Pacific salmonids in the Atlantic and we're
9 not trying to produce Atlantic salmonids in
10 the Pacific.

11 Next slide please.

12 On the section on aquaculture
13 facilities, we've got the 50 percent recycling
14 of nutrients input, which we have already
15 touched on. Now, I'm guessing that this is
16 really aimed at making sure that we maintain
17 the balance the ecosystem and preserve the
18 environment surrounding the immediate fish
19 farm. So my question would be is 50 percent
20 enough? And I think in order to answer that
21 question, we have to look at specific cases
22 because it will depend upon two things. It

1 will depend upon the amount of nutrients going
2 into the environment and the environment's
3 ability to assimilate the nutrients.

4 I want to just ask you what is
5 going to be meant by recycling. a little bit
6 vague. Does that mean I actually have to
7 remove, as a farmer, 50 percent of the
8 nutrients, recycle them myself? Or can we
9 look at the environment's ability to recycle
10 the nutrients? And exactly how we're going to
11 measure whether or not 50 percent of the
12 nutrients have been recycled is also a
13 question I have. I think it's quite easy to
14 measure the nutrients going in, but it's going
15 to be almost impossible for the certifiers I
16 think to measure whether or not we've taken 50
17 percent back out.

18 Now, the position in the UK with
19 regard to nutrient inputs is pretty tough.
20 We're required by the government to monitor
21 the sediment, and water column, to ensure that
22 we are not having an unacceptable impact upon

1 the environment. We have to do a lot of
2 regular basic testing looking at redox
3 potentials, looking at biodiversity, to ensure
4 that the sediment is in good order. And the
5 government is doing quite a lot of testing in
6 the water column to make sure there's no
7 eutrophication occurring.

8 Now, most of the work seems to
9 show that we are generally within the balance
10 of capacity. And where we're not, the
11 government will actually reduce our tonnage or
12 make us take steps to reduce our input into
13 the environment.

14 In general, research seems to show
15 in the UK that within three to 24 months of a
16 site not being used any longer, the sea bed
17 recovers to what they term a natural state.
18 Water column monitoring studies around the UK
19 and from around Shetland are showing that
20 there's no different in the nutrient levels in
21 the water with high aquaculture activity and
22 the offshore control samples.

1 Next slide please.

2 I would suggest altering the
3 wording of the phrase, with 50 percent, to
4 read, the aquaculture facility must include a
5 suitable waste management plan approach, which
6 must, one, demonstrate a provision of
7 scientific evidence that the facility is not
8 having a long-term irreversible negative
9 impact upon the surrounding ecosystem,
10 benthic, or water column. It would be in the
11 interest of the farmer to do the testing to
12 prove that we're not damaging things.

13 I'll not touch on feed management
14 because we really don't have the time. I've
15 already got my one minute, so we'll move on to
16 the next slide. I'll just urge you to speak
17 to the feed manufacturers and make sure that
18 we get a workable standard.

19 And I would just like to thank you
20 again for the opportunity to speak. And if
21 there's any questions, I'm happy to take them.

22 CHAIRPERSON DELGADO: Questions?

1 Thank you very much. We move now to Dick
2 Martin, who has a proxy for Neil Sims.

3 MR. MARTIN: I tried to practice
4 my Aussie accent, and it didn't come out very
5 well, so I'll do my best. On behalf of Neil
6 Sims from Kona Blue, the NOSB Livestock
7 Committee and members of the Aquaculture
8 Working Group are to be commended for their
9 diligence and perseverance in developing draft
10 organic standards for fish feed and net pen
11 systems. This is a very political process,
12 but it seems that we have been able to move
13 towards broad general acceptance of the need
14 for organic standards that include net pen
15 culture of marine fish.

16 It may be helpful to recall that
17 politics is the art of possible. In several
18 cases, however, what is proposed in the
19 Livestock Committee's recommendations is
20 simply not possible. Organic standards were
21 developed for terrestrial agriculture firstly
22 by developing the practices on the farm and

1 then by codifying these practices within the
2 organic rules.

3 Here, however, the Livestock
4 Committee and others who have commented are
5 proposing rules for organic aquaculture that
6 have no basis in farm practices. It seems
7 that the basis for some of these rules is an
8 obtuse desire to wish into being a more
9 holistic, biodynamic, ecosystem-based way of
10 life. It's admirable, but it's illogical.
11 And the standards are impossible to meet in
12 two glaring ways. One, nutrient recovery.
13 The requirement for a performance target
14 recycling of a minimum of 50 percent of all
15 nutrients has only ever been achieved in non-
16 commercial research trials. Even if it were
17 possible to do this, the adverse environmental
18 impacts of growing that much algal or bybel
19 biomass would be far worse than the impacts of
20 the nutrients themselves.

21 The best approach to minimize
22 adverse environmental impacts is to encourage

1 fish farmers to locate their net pens and
2 sites with optimum water flow. Yet, this
3 obligation for nutrient recapture compels the
4 farmers to relocate their net pens in areas
5 where nutrients will stay concentrated and
6 available to other trophic levels.

7 Please remember all of the
8 available evidence suggests that in open ocean
9 aquaculture there's no measurable nutrient
10 loading in the effluent. Please refer to the
11 water quality monitoring data on our web site,
12 konablue.com.

13 So if there's no impact, what are
14 we trying to save and preserve here? Why
15 should we not let nature assimilate the
16 nutrients and use them as she sees fit? Why
17 is there this compulsion to force the farmer
18 to do in a concentrated fashion that which
19 nature can accomplish far more effectively in
20 her own diverse, disparate, and dispersed
21 manner? Why must we be so self-absorbed to
22 think that we humans must derive the benefit

1 of nutrient recycling? Is it not sufficient,
2 is there not still intrinsic value to have the
3 ecosystem cycle the nutrients through?

4 That's the key premise of the open
5 ocean aquaculture: to work with the ocean's
6 ecosystem. To insist on capturing the
7 nutrient recycling for human use, is to say
8 that open ocean aquaculture can never be
9 organic.

10 I, therefore, propose that the
11 wording for the nutrient recapture provision
12 include an exception that provides for net pen
13 sites in highly exposed offshore locations to
14 be exempted from this requirement, that they
15 can demonstrate that there's no appreciable
16 increase in nutrients from farm operations.

17 Second, on fish meal and fish oil
18 sources, the Livestock Committee has
19 previously rejected the notion of using
20 poultry or other organic terrestrial animal
21 byproducts in fish feed primarily on the basis
22 the European organic standards do not allow

1 the use of terrestrial byproducts. So why
2 then would Livestock Committee not embrace the
3 only meaningful alternative that's been
4 adopted by the Europeans and allow the use of
5 edible seafood byproducts from sustainable
6 fisheries?

7 Yes, Kona Blue has shown at a
8 research scale that we can reduce fish meal
9 and fish oil levels in the diets of Kona
10 Kampachi to a one-to-one ratio of wet fish in
11 to wet fish out exists. But, we can only do
12 this by using edible seafood byproducts from
13 a sustainably-managed British Columbian Hake
14 fishery and by using poultry's processing
15 byproducts, as well. What organic principle
16 does this offend? Is it recycling? Is it
17 reuse the nutrients? And is it impossible?

18 We would contend that organic feed
19 should rightly be able to be included in
20 edible seafood processing byproducts from
21 sustainably-managed fisheries and processing
22 byproducts from organic poultry in unlimited

1 quantities. If you feel so compelled that you
2 must restrict one, then so be it. But you
3 cannot prohibit both and expect to be able to
4 encourage growth of an organic fish farming
5 industry.

6 I rarely agree with Food and Water
7 Watch. I wholeheartedly endorse Patricia
8 Lovera's comments to the NOSB dated 11/3/2008,
9 where she asserts that the goal of organic
10 culture systems should be to minimize
11 environmental impact and promote biodiversity.
12 I believe that allowing for natural
13 assimilation of nutrients in open ocean net
14 pen systems and encouraging the use of edible
15 seafood and organic poultry processing
16 byproducts in fish diets helps to minimize
17 environmental impacts and promotes
18 biodiversity. Your rule-making should reflect
19 this. Sincerely, Neil Sims.

20 CHAIRPERSON DELGADO: Thank you.
21 Any questions? Hugh?

22 MR. KARREMAN: Just a question.

1 What other species use net pens other than
2 salmon? Like the Kona Kampachi obviously, but
3 what other ones? Like what percent of the
4 industry?

5 MR. MARTIN: The bass fisheries.

6 MR. KARREMAN: And are they near
7 the shores, or are they -- he's out in the
8 open water. He really means way out, right?

9 MR. MARTIN: Well, there's gray
10 area there. Some are near the shore, and some
11 are open water but they're still within, you
12 know, it's not as if the horizon doesn't have
13 land. They're not hundreds of miles offshore.
14 They're still manageable by easy access, but
15 they're considered the open ocean because
16 they're not in protected area. You also have
17 cobia production. That's just starting, but
18 that's going to be a huge species that's going
19 to be coming forward. You have, sable fish is
20 now being experimented with, halibut is being
21 raised, cod is being raised. They are a
22 combination of in-shore and I wouldn't say

1 classically offshore like Neil's but somewhere
2 in between.

3 Everyone would love to be
4 offshore, but then you run into nature. You
5 run into weather, and you run into practical
6 situations. For example, aquaculture is a
7 very low carbon, I would almost consider it a
8 carbon-neutral industry. You're not burning
9 fossil fuels to propel this industry forward.
10 But if you start going offshore and you start
11 using -- I mean, it's relative, but still it's
12 a relatively, part of it is the management of
13 being able to physically get there and back
14 and manage the fish sensibly and practically.

15 MR. KARREMAN: So there is a
16 growing market or growing industry of other
17 species than the salmonids?

18 MR. MARTIN: Absolutely.
19 Absolutely. We don't see it that much in this
20 country. It is imported in this country, but
21 it's mostly used as a whole fish. And here we
22 don't consume that much whole fish, small

1 whole fish. We don't cook whole fish at home.

2 MR. KARREMAN: And are these other
3 species that you're talking about, are they,
4 do they migrate between salt and fresh water
5 at all? Say in the salt water, they're
6 permanently --

7 MR. MARTIN: No, not all. Not
8 all. Bass and green do not. Cobia, I don't
9 think cobia, I think that they exist just in
10 the sea. They're a tropical breed, same as
11 Neil's fish.

12 CHAIRPERSON DELGADO: Okay. Any
13 other questions? Okay, thank you. We will
14 recognize you in a minute. Thank you very
15 much. Up next is Ramkrishnan Balasubramanian,
16 and after that is Patty Lovera.

17 MR. BALASUBRAMANIAN: Well,
18 thanks, Rigo, for trying to pronounce my first
19 name and last name. Well, thanks, everyone.
20 First of all, thanks for a good
21 recommendation. My name is Ram, and I'm the
22 Certification Program Director for QCS, and we

1 do operate a private aquaculture program.

2 The 2000 data from the Food and
3 Agricultural Organization, FAO, and the status
4 of aquaculture indicates two things:
5 aquaculture is the way to go for the future,
6 and more and more species are farm-raised. As
7 we define and build the model for organic
8 aquaculture, the aquaculture industry needs to
9 have the allowance of fish meal and fish oil
10 to get jump-started.

11 Between 2007 and 2008, there were
12 a few peer-reviewed scientific articles
13 published which was carefully studied by our
14 program in which they evaluated different
15 species with a different diet and have
16 concluded the need for fish meal and fish oil
17 for the carnivores. An exclusion of fish meal
18 and fish oil will affect the quality of the
19 final product. This paper identified a few
20 alternatives. However, at this point of the
21 time, it's not commercially-feasible.

22 Yes, QCS does support the AWG

1 recommendations, but we also want to be
2 pragmatic and see the Livestock Committee's
3 recommendation as to the way to move forward.
4 However, we have concerns, and also a few
5 clarifications on the existing
6 recommendations.

7 First, the concerns. I don't know
8 whether this is what the Board wanted to
9 accomplish, the unintended consequences of
10 catching fish species which was never intended
11 to be caught for fish meal or fish oil
12 purposes. And if that's not the case then I
13 will withdraw what I said.

14 There have been several species,
15 such as menhaden, which is not meant for
16 consumption of human beings, that will be used
17 or seven species which is not exploited in the
18 past could be exploited under this provision.
19 However, we have collected enormous data, and
20 feel comfortable that many, if allowed under
21 the regulation, you can expect in a typical
22 situation the trimmings and fallout by any of

1 those species can vary up to 20 to 40
2 percentage. That could be used as the fish
3 meal and fish oil as a compromising position.

4 And then we seek clarification on
5 the following statements, especially the word,
6 under the 205.252(b), the word minimize.

7 There are several other language, similar
8 wordings, than the word minimize in reference
9 to minimizing the nutrient load into the
10 river. Hugh brought up the question to one of
11 the participants is what is the difference
12 between a water body and the land systems? As
13 many of you may know, 90 percent of the U.S.
14 seafood consumption comes from externally.
15 Some of them are systems that is exactly in a
16 public land system that people use it as a
17 drinking water source. It is being used to
18 irrigate land-based system, land-based
19 production systems, so that's the concern. So
20 as a program, as a certification program,
21 there are many certifiers here, we would have
22 a problem in enforcing this to define what the

1 word minimize exactly means.

2 The next clarification we seek as
3 a certification agency is what does the word,
4 sustainable, mean? Sustainable what is to you
5 may not be sustainable to us. It could be
6 social, economic. And when we enforce this,
7 if the rule is passed, it's going to be very
8 difficult.

9 The third word we seek
10 clarification is 205.252(i) is the phrase, the
11 next recruitment cycle. Honestly, I didn't
12 understand what the Committee is to trying to
13 reference, and we seek clarification on that
14 to be consistent, if this passes, to have a
15 consistent interpretation. And, again,
16 205.252(m), the word, organic process to
17 remove the contaminates, and I hope these
18 words are better defined or we have more
19 information on this for us as a certifier.

20 I know it's pretty much early in
21 this part of the process. It still has to be
22 published by the NOP, but I just want to make

1 sure these are addressed before it goes to NOP
2 so that you we don't have another chaotic
3 situation. Thank you.

4 CHAIRPERSON DELGADO: Questions?
5 Okay. Thank you very much. Moving on, Patty
6 Lovera. And after her, we will have Marianne
7 Cufone.

8 MS. CUFONE: In the interest of
9 time, Patty and I consolidated, and actually,
10 we're all from Food and Water Watch, so I'm
11 actually Marianne Cufone. Since we were using
12 props earlier, I thought I would bring one of
13 my own. We'll see if you can guess which one
14 is the farmed and which one is the wild. I'll
15 tell you afterwards.

16 My name is Marianne Cufone. I'm
17 here on behalf of Food and Water Watch. We're
18 a national non-profit consumer action
19 organization. I'm the director of their fish
20 program there. I'm also an environmental
21 attorney. I've been working on fish farming
22 issues for many years. I sat on the State of

1 Florida Advisory Panel when they created their
2 aquaculture regulations. I was the Vice Chair
3 of the Gulf of Mexico Fishery Management
4 Council Advisory Panel on offshore aquaculture
5 while they were developing their regulations,
6 and I also testified in front of the National
7 Ocean Policy Subcommittee for the U.S. Senate
8 Commerce Committee when they were having
9 hearings on the national offshore aquaculture
10 legislation. So I have a pretty good history
11 on this particular subject.

12 When I first heard that the Board
13 was considering standards for organic seafood,
14 I thought, well, it's impossible to label
15 currently any seafood as organic in keeping
16 with the principles of that label. And so I
17 didn't believe that you were actually talking
18 about this.

19 Then I learned the Board was
20 actually considering labeling carnivorous fish
21 farmed in open pens and cages as organic and,
22 frankly, I was stunned. There's no

1 requirement to have organic seafood, and we
2 shouldn't be grading on a curve here where
3 better seafood production gets the organic
4 label. That's not what organic is all about.
5 What you're composing is far from what should
6 be called organic, and I just heard people ask
7 for an even lower standard because they don't
8 believe they can meet what you're proposing
9 currently. So I think that's really
10 disturbing.

11 You asked Urvashi earlier about
12 environmental issues associated with ocean
13 fish farming or open water fish farming. I
14 want to share some of those with you today and
15 let you really consider whether this is
16 something that should be called organic.

17 So open water fish farms can be
18 really dirty. These farms allow free flow of
19 water between the cages and open pens, so
20 concentrated amounts of food, waste, diseases,
21 and any chemicals or antibiotics that can be
22 used on the cages or in the farms can flow

1 straight to the waters.

2 A report about one ocean fish
3 farming facility affiliated with University of
4 Hawaii, you were talking about Hawaii a lot
5 earlier so I wanted to mention this, said that
6 the farm grossly polluted the sea floor and
7 severely depressed sea life. This is not no
8 impact, according to Mr. Sims. This is not no
9 impact. In Norway and British Columbia,
10 numerous problems have occurred with parasites
11 spreading from caged farm salmon to wild
12 salmon.

13 Open water fish farms can also
14 cause ecological damage. Pens and cages have
15 escapes. There's no way to fully contain the
16 wildlife. It can be due to human error,
17 weather, equipment failure, and a variety of
18 other things. Escapement can affect native
19 populations. Farmed animals are often
20 different than wild fish, whether or not
21 they're the same species. They can change in
22 captivity. A prime example is snapper farm

1 off of Culebra near Puerto Rico, which doesn't
2 exist anymore, but they used to grow cobia,
3 and the cobia didn't look like wild cobia at
4 all. They were, arguably, the same species,
5 local. But they just didn't look the same
6 because sometimes they change in captivity
7 because things are different in a farm than
8 they are out in the wild.

9 So these fish can intermix with
10 wild fish, change habits. A lot of fish have
11 learned behaviors, like spawning or feeding.
12 Those things can change when you intermix farm
13 fish with wild fish.

14 Additionally, farm fish can
15 overtake wild fish. Often, they're bred to be
16 stronger, bigger, reproduce faster than wild
17 fish. And when they get out into the regular
18 population, they can overtake the wild
19 species, and that can change the ecosystem
20 completely over time.

21 Farm fish can increase fishing
22 pressure on wild fish. We've been talking a

1 lot about the fish feed issue, and that's
2 really significant. Already, major amounts of
3 wild fish are removed from ocean waters.

4 About 23 million to 33 million tons annually
5 worldwide were used for feed in recent years.

6 One-half of the world's fish meal
7 already goes to aquaculture and nearly 90
8 percent of fish oil. This isn't organic.
9 Calling fish organic that contain any amount
10 of wild fish just isn't appropriate.

11 As part of the record of
12 submitting a compilation of scientific and
13 other pieces that discuss assorted concerns
14 with open water fish farms, please review and
15 consider them carefully prior to making any
16 decision about organic seafood. And I'll be
17 submitting those shortly.

18 I provided a lot of the same
19 information to Congress when I testified
20 before them, and the bill that they were
21 considering wasn't passed. And one of the
22 major reasons was because there were numerous

1 environmental and human health and economic
2 concerns. To allow fish produced in open
3 water pens and cages to be labeled organic
4 isn't a responsible choice. It smacks in the
5 face of what the organic label is supposed to
6 be. This recommendation is about more than
7 farmed fish. It's about consumers' trust in
8 the organic label. And to change that could
9 really change what people think of organic
10 overall.

11 I urge you to reject the proposed
12 standard. And we also have 15,000 consumers
13 that urge you, as well. I wanted to submit
14 for the record over 15,000 comments that we
15 had to us to provide to you. I have those on
16 electronic CD. We wanted to save some trees
17 while we're saving some fish. And just also
18 wanted to briefly show you that we also got
19 several hundred postcards, they're included in
20 these, from people that said that they're a
21 U.S. citizen interested in where their seafood
22 comes from, and they urge you not to undermine

1 the trust consumers have in the U.S. organic
2 label. If fish can't meet the strict
3 standards or organic production then there
4 should not be an organic label. Thank you.

5 CHAIRPERSON DELGADO: Questions?
6 Hugh?

7 MR. KARREMAN: I'm not going to
8 engage you that much I promise, you talked in
9 front of Congress. But I'm just wondering a
10 lot of people are saying, you know,
11 aquaculture, even with the way we propose this
12 in our documents, you know, the standards of
13 aquaculture will be diminished and everything.
14 What in general -- maybe this is a really
15 stupid question, but what in general are
16 people's perceptions of what organic
17 agriculture is right now for livestock?

18 MS. CUFONE: Well, as long as you
19 mention that, Dale Kelley actually is going to
20 come up after me, and she sort of did a
21 standing poll with people that she talked to
22 on her way here from Alaska. She's come all

1 the way from Alaska to talk to you about this.
2 But, generally, people's expectations of
3 organic are chemical-free and made in such a
4 way where environmental standards are
5 considered. Quite frankly, this document
6 needs a lot of work. It doesn't meet the
7 general perception of organic. You know, most
8 consumers don't have the time to do the in-
9 depth kind of study that folks like me do on
10 food and seafood, and so I understand probably
11 better than the average bear what organic
12 actually means. But out in the general
13 public, they think it means something special.
14 And this particular standard that you're
15 proposing is not special.

16 CHAIRPERSON DELGADO: Any other
17 questions? Thank you. Next up is Dale
18 Kelley, followed by Shauna McKinnon. Next, as
19 I said, is Dale Kelley, followed by Shauna
20 McKinnon.

21 MS. KELLEY: Good afternoon, and
22 thanks for staying late to take our comments

1 today. My name is Dale Kelley. I'm the
2 Executive Director of the Alaska Trollers
3 Association. We represent hook-and-line
4 salmon fishermen in Alaska. I'm also on the
5 board of the United Fishermen of Alaska and an
6 officer of Commercial Fishermen of America.
7 And my comments today, such that they are,
8 will represent those groups. And not that
9 this is all about me -- oh, and our offices
10 are located in Juno, Alaska. And, no, I can't
11 see Russia from my house. Let's get that out
12 of the way.

13 I think you should know just a
14 little bit about me just so you can kind of
15 put my remarks in context because, although I
16 was kind of identified as Food and Water Watch
17 and we work with them a lot, we work with a
18 lot of people on a number of issues with
19 regard to the marine environment.

20 My schooling includes pharmacy and
21 fisheries biology. I spent ten years in
22 pharmacy before I went over to the fish side.

1 I grew up ranching. I cultured fish, I've
2 commercially fished, and I've caught fish on
3 my fly rod. So there's many different ways
4 that, as an individual but also as a
5 representative of a large number of fishermen,
6 I look at this issue.

7 We've been engaged in the fish
8 farm issue from Alaska Trollers Association
9 and United Fishermen of Alaska since the mid
10 80s when they began talking about farming fish
11 off our coasts, and we didn't like that too
12 much in the state. Our state is a very fish-
13 reliant state, heavily dependent, 150
14 fisheries, not many more communities than that
15 in the whole state. Most of them are reliant
16 in some format on commercial fishing. My
17 fleet, for instance, one out of every 35
18 people in my region works on the back deck of
19 one of our boats, and that doesn't count all
20 of the other 18,000 commercial fishermen in
21 Alaska and certainly the 7,000 in my region.

22 So we are very concerned about the

1 health of the ocean, and wholesomeness and
2 purity of products, because, quite honestly,
3 people are confused when they go to the
4 marketplace these days. They hear so much
5 about fish. Is it endangered? Should I eat
6 farmed? Should I eat wild? The organic label
7 I think just is adding to some of that
8 confusion, quite honestly.

9 So, as you heard, I did my little
10 non-statistically relevant scientific sampling
11 on my way from Alaska, and I asked everybody
12 I could. My basic question was, What do you
13 think organic is? What does that mean to you
14 when you see organic? and their response, with
15 one exception, was pesticide free. And I
16 didn't count how many people; that's how bad
17 my survey results were. But I know I asked at
18 least 30, because I was pretty rigorous about
19 it there for a while. We had a delay. The
20 one other person said, her first response was
21 expensive and her second response was
22 pesticides.

1 So, obviously, people don't
2 understand what the Organic Program really is
3 about and what your standards are, and I'm
4 learning quite a bit about it, and we learned
5 more about it in the late 90s or early 2000s
6 when Alaska fishermen, the state of Alaska
7 even, asked this Board to certify our seafood
8 as organic. There's pros and cons to all of
9 that. I understand all those arguments of why
10 this Board didn't do it, which makes it
11 particularly confounding that our natural and
12 wild product doesn't qualify but a fish in a
13 net pen would. Because what I understand of
14 your standard is that it's supposed to be
15 natural and that these products are kept in a
16 somewhat natural environment. Well, when I
17 was raising full Herefords and they're grazing
18 on a large pasture, you know, pretty low
19 density, that's much more reminiscent of home
20 on the range than high-loaded density net pens
21 hung in an ocean.

22 Sustainable practices. One of the

1 reasons the bills have not passed, and I've
2 worked with our congressional delegation on
3 legislation for years, one of our major
4 concerns is the managing agency, NOAA, has
5 gone from a code of conduct, voluntary code of
6 conduct, to statutes that really aren't
7 effective and don't involve a national set of
8 standards, like we have for our other ocean
9 regulatory processes, that kind of guide what
10 the national interest is in the ocean.

11 I see I have very little time
12 left, but one thing I do notice talking to a
13 few folks here is that, obviously, part of
14 agriculture already manages aquaculture, and
15 you have a set terrestrial-based program that
16 I don't really understand very well and I'm
17 not going to pretend to tell you what I think
18 I know about it. But you don't have the same
19 regulatory process in the ocean yet. And I
20 believe you really need to get national
21 standards and statutes agreed to by the people
22 as a nation because once you put those fish in

1 the water -- we catch Atlantic salmon in our
2 fishery a thousand miles a way from where
3 they're produced. We don't allow fish
4 farming, but we have nonindigenous species
5 that we're catching that are coming from fish
6 farms.

7 A host of issues. You've heard it
8 all. But I would just announce that you might
9 be very careful before you branch into the
10 ocean for organic standards or anything else
11 involving farmed fish. I'm not going to say
12 good or bad about it; there's just a lot of
13 work to be done before we involve ourselves.
14 They don't seem very organic to me either, as
15 a consumer.

16 CHAIRPERSON DELGADO: Thank you.
17 Any questions? Hugh?

18 MR. KARREMAN: What do you think
19 of what we heard that the EU is doing as far
20 as allowing the byproduct of edible fish to be
21 used for feeding organic fish there in the EU?
22 What do you think of that?

1 MS. KELLEY: Well, you know,
2 obviously, for the EU, per se, but just full
3 utilization of species is always a good. I
4 mean, I'm all for that. I do think that there
5 could be some pressure put on our regulatory
6 agencies with respect to our TACs, our total
7 allowable catch, in some of these fisheries.
8 I notice in your proposal that it mentions
9 pollock fishery off of Alaska, for instance.
10 This year and probably next year they have
11 taken deep cuts to their TAC from just stocked
12 defines that they're not really sure about.
13 So I do wonder if there would be increased
14 pressure if you have another industry relying
15 on the byproducts of the wild capture fishery
16 to produce. So that's another thing you might
17 not have thought of.

18 MR. KARREMAN: What if that
19 industry was responsibly managed, or all the
20 other kind of terminology that --

21 MS. KELLEY: Well, we believe ours
22 is. We're really known for it. MSC, they

1 came to Alaska to certify our salmon
2 fisheries, because we're known, we have
3 sustainable built into our constitution. It's
4 not even a choice. A voluntary code of ethics
5 for conduct for fish farming was so appalling
6 to me, I'd be embarrassed to ask for it. But,
7 yes, obviously, it needs to be a sustainably-
8 managed fishery. And if I was a fish farmer,
9 if I put myself on the other side of that, and
10 I'm relying on a product and suddenly it's not
11 a deliverable, you know, when you do
12 production over here that's relying on that
13 fish.

14 CHAIRPERSON DELGADO: Any more
15 questions? Okay. Next is Shauna McKinnon,
16 followed by Rachael Hopkins.

17 MS. MCKINNON: I don't think that
18 Rachael is going to be presenting. She was
19 the next person. My name is Shauna McKinnon.
20 I'm presenting on behalf of the Living Ocean
21 Society. Living Oceans is the largest marine-
22 dedicated conservation organization in Canada,

1 and we're based in British Columbia, and we're
2 also one of the seven members of the Coastal
3 Alliance for Aquaculture Reform. This is a
4 coalition that was formed in 2001, and the
5 mission of the coalition is to work together
6 to address the impacts of open net cage salmon
7 farming, and specifically trying to encourage
8 industry and government to change practices to
9 protect wild salmon and to protect marine
10 ecosystems.

11 Maybe I'll just start by saying
12 that this is the first time that I've
13 presented to the NOSB in person, but I've been
14 with my colleagues submitting submissions for
15 two years now, and I know that the Board has
16 put in a lot of thought to this issue and has
17 a lot of dedication. So I thank you for doing
18 that. And I'm thankful to be having this
19 opportunity to present in-person today.

20 For the Coastal Alliance for
21 Aquaculture Reform, because we're based in
22 B.C., we spend a lot of time, a lot of

1 research capacity has gone into documenting
2 and researching the impacts of open net cage
3 salmon farms, so that's dealing with net cages
4 and carnivorous species. Because of this, in
5 B.C. there is a lot of awareness of the
6 negative impacts of the industry. So when
7 speaking in Canada, oftentimes I end up
8 talking more about the positive aspect of
9 aquaculture and where some of the
10 sustainability can be improved and some of the
11 success stories that are already there.

12 So I just would like to start with
13 that, from CAAR's perspective, we support the
14 development of organic aquaculture standards,
15 and we support that in types of aquaculture
16 where the fish farmers can be net producers of
17 fish protein. So the one-to-one fish in and
18 fish out would be the minimum standards. And
19 we also promote the development of aquaculture
20 where marine ecosystems and biodiversity can
21 be protected and promoted.

22 So in the submission that I have

1 handed in electronically, I deal with both the
2 wild fisheries and the net pens issues, but my
3 comments today are going to focus more on net
4 pens. But if you have questions specifically
5 around the wild fish, I encourage you to ask
6 me questions.

7 So the reason why I'm here, coming
8 all the way from Vancouver, is because Canada
9 is one of the world's top producers of net pen
10 farmed salmon. And, basically, all farm
11 salmon production is done in net pens at the
12 moment. Roughly 90 percent of the farm salmon
13 produced in Canada is exported to the U.S.,
14 and that's why the standards that the NOSB is
15 developing are very important to our own
16 production systems.

17 So pretty much all of the fresh
18 farmed salmon that you buy in the U.S. comes
19 from Canada, and pretty much all of the frozen
20 farmed salmon you find on your shelves will be
21 coming from Chile. So this is an industry
22 where you're very much relying on exports.

1 So because there is so much farmed
2 salmon production in Canada, there is years of
3 research that independent scientists and
4 conservation groups have been engaged in to
5 better understand the environmental impacts from
6 hundreds of thousands of fish being raised in
7 net pens. And there were questions earlier
8 about why is there so much focus on salmon.
9 Well, it's mainly because salmon is the
10 biggest experiment that we've had in net pen
11 fin fish production, so that's our best
12 example of what some of the problems can be
13 and how we need to address those.

14 So the results of these research
15 really do not show an optimistic picture for
16 making net pen production more sustainable.
17 In fact, a global study conducted last year
18 and published last year found that everywhere
19 salmon are farmed in net pens wild salmon and
20 trout suffer. From a meta-analysis, they found
21 that for every 1,000 metric tons of net pen
22 salmon produced, wild salmon and trout

1 populations decreased by one percent. So in
2 many areas, this translates to more than a 50
3 percent decline in wild stocks near farms.

4 I've gone way over time, so maybe
5 I'll just quickly hit on some of the main
6 points. For one of the standards that are in
7 the proposed net pen standards, Section
8 205.255 states that net pens must be fitted to
9 avoid migratory routes of native species and
10 to avoid disturbing reproductive patterns of
11 local species, I'm very happy to see that in
12 there because it shows that the NOSB has been
13 listening to the science, what the science is
14 telling us, which is wild fish need to be
15 separate from net pens. They cannot be in the
16 same place because net pens do not offer ways
17 to control the spread of parasites and disease
18 between farmed and wild fish. Escapes cannot
19 be controlled in net pens, and in organic
20 production in Europe escapes are continuing.
21 And that does have ecological implications for
22 wild fish.

1 And maybe in closing what I would
2 really like to focus on is that the U.S. does
3 not need to take Europe's lead on certifying
4 open net pens. Just as in U.S. organic
5 livestock standards, you continue to prohibit
6 use of antibiotic and chemical treatments,
7 unlike in Europe. Net pens can be kept out of
8 the U.S. standards.

9 Research is showing us that the
10 most environmentally-sustainable aquaculture
11 practices are those that use closed contained
12 systems, like ponds and solid-wall tanks, on
13 land or in the ocean because these systems
14 offer ways to ensure waste is recycled, limit
15 the flow of disease and parasites, control
16 escapes, and reduce algae blooms. So these
17 are all things that are needed to be done to
18 control escapes. Thank you.

19 CHAIRPERSON DELGADO: Questions?

20 MR. KARREMAN: So how would you,
21 what do you think about using byproducts from
22 edible fish for salmon in containment tanks?

1 MS. MCKINNON: That's a good
2 question. I think one of the things you need
3 to look at is separating organic standards
4 from what would be the most sustainable option
5 because I think the questions around using
6 wild fish in feed are very different for
7 organics than if you were looking to create a
8 single standard outside of organics. So just
9 to speak from a sustainability perspective,
10 yes, recycling nutrients is a good option.
11 But as the speaker before me suggested,
12 creating a demand for fish that may not always
13 be there can be problematic, and you don't
14 necessarily want to build your whole
15 production on a resource that's not in your
16 control.

17 CHAIRPERSON DELGADO: Any other
18 questions? Thank you very much. Next is Jim
19 Pierce, followed by --

20 MS. FRANCES: Actually, next is --

21 CHAIRPERSON DELGADO: Sorry.
22 Okay.

(Simultaneous speakers.)

MR. PIERCE: Then if it's okay, I can go ahead and split my five minutes with Mr. Israel Snir, who is a Honduran net pen tilapia producer. So you're going to lose all the humor out of this one. I'll try to keep it to two minutes. Ready?

Okay. For the record, I'm Jim Pierce, rainbow trout producer, in support of the aquaculture recommendations for fish meal net pens on behalf of the Aquaculture Association of Wisconsin. Good job, Livestock Committee, for consuming and digesting the myriad of information from the symposium and especially from us, the fish farmers, and for constructing tough love goal-based standards.

These recommendations, on a macro view, represent goal-based continuous improvement policy that clearly meet the tenets of organic farming through the established system of an auditable organic system plan, such as we encourage you to do.

1 Heed the producers, not the obstructionists,
2 and please pass these recommendations.

3 The ten-year step down allowance
4 for fish meal including stringent
5 contamination testing and labeling for
6 consumers is a bridge to a shifted paradigm
7 where innovative fish farmers will be able to
8 demonstrate to the world that, like pork and
9 poultry, there are better practices than
10 conventional and net pen production. There
11 are better practices than conventional net pen
12 production.

13 The idea of a separate section of
14 aquaculture practices is a wonderful idea
15 since siting, raising, feeding, and other
16 practices are so very different. However, the
17 creation of Section 611 and 612 as a separate
18 list for approved aquaculture materials is not
19 a good idea. Fish are livestock. The two
20 lists can and should be combined.

21 I thought I would also rely on a
22 prop. Again, thank you for your dogged

1 efforts to get these recommendations out. The
2 Wisconsin Aquaculture Association feels that
3 there's a valuable market niche and
4 significant consumer allegiance to be captured
5 with an organic label, not only for vegetarian
6 species but for all farm-raised fish. We urge
7 you to pass them, to include them with the
8 recommendations that have been passed already
9 and, most importantly, continue communicating
10 with the fish farmers. And I will now cede to
11 Mr. Israel.

12 MR. SNIR: Okay. Thank you, Jim,
13 for inviting me on behalf of the AWG. I
14 changed my plans to be able to share with you.
15 I have three minutes, so I'll do it quickly,
16 and I guess tomorrow I'll have a couple more
17 minutes.

18 Okay. I represent the Regal
19 Springs Group. We are the world's largest
20 tilapia producer, fresh and frozen, 20 years
21 in operation, over 50,000 metric tons in
22 production in Honduras and Mexico. I'm not

1 here by myself. I'm here on behalf of the
2 more than 4,000 employees and tens of
3 thousands of their families and communities,
4 the people who are producing your food.

5 We all should agree that all
6 people, regardless where they are, the
7 language, the money they have, their religion,
8 all deserve to eat better and healthier food.
9 Regal Springs makes it happen every day and
10 night directly and indirectly. Regal Springs
11 tilapia is the world's largest net producer of
12 organic tilapia fillets. In El Cajon in an
13 artificial, fresh water hydroelectric
14 reservoir. In Honduras is where we work. Our
15 aquaculture facility is fully embedded with
16 people and nature, enough to mention that this
17 very lake is the home to 5,000 protected
18 crocodiles habitat, and we all live in peace
19 and harmony.

20 Organic, for us, is not the
21 product, it's a way of life. The goal is
22 organic communities producing organic food for

1 better health, better education, housing,
2 nutrition, and more. Our company, Aquafinca,
3 since four years ago is recognized and
4 certified by two of the leading organic
5 certifiers in Europe, Natural Land and
6 Biospace for reproduction and processing of
7 frozen and fresh tilapia fillets for the EU
8 market. We can convert all Aquafinca
9 conventional production to organic if it is
10 readily available, and it is not. Our diet is
11 vegetarian. We feed no animal products,
12 byproducts; and, therefore, solely depend on
13 organic grains and cereals byproducts for
14 human consumption.

15 However, our desired market is
16 America. Regal Springs has a supplemental
17 interest and is eager to be able to service
18 our natural markets and, therefore, seeking to
19 be certified as soon as possible by the USDA.
20 We have the ability in short terms to
21 continuously provide you with our organic
22 tilapia fillets to satisfy your very demanding

1 markets from our fully vertically integrated
2 truly organic tilapia fillet operation.

3 Along the years, Regal Springs
4 tilapia has developed, created and
5 demonstrated its own religion to make our
6 company sustainable. We believe we found the
7 balance between environment, people and the
8 economy to offer the new holy triangle for the
9 aquaculture industry. Our slogan, It is not
10 about fish, it is about people, became a
11 reality in our project. We speak five
12 languages. We operate in three continents.
13 We practice four religion. The tilapia is our
14 first and most common.

15 We close the cycle. We are closed
16 net producer. We have zero waste. We have
17 zero chemicals. Our lakes are stocked and
18 naturally populated with indigenous wildlife
19 creatures surviving on our feed also. All our
20 processed byproducts are utilized for fish
21 meal, oil. All of those could become organic.

22 We are operating in a reserved

1 area for the dramatic changes life of the
2 surrounding communities and for such better
3 preservation of the natural wildlife and
4 forests by the local communities. Our
5 communities are greener. Our water is
6 cleaner. Our people are healthier. We desire
7 to make our product available for your
8 markets. We fully support the proposed AWG
9 standards. We found them workable and really
10 seek for promoting the common goals. Thanks.

11 CHAIRPERSON DELGADO: Questions
12 for our speaker? Dan?

13 MR. GIACOMINI: Yes, Mr. Israel,
14 as host of AWG Livestock Committee net pen
15 recommendation, do you find that workable?

16 MR. SNIR: Very much so.

17 CHAIRPERSON DELGADO: Any other
18 questions? Thank you both. Up next is Becky
19 Goldberg. And, Marty Mesh, you decided to go
20 after? Marty will go after Becky.

21 MS. GOLDBURG: Well, thank you. I
22 want to begin by saying I'm, of course, Becky

1 Goldberg, and I am a member of AWG and a
2 former member of the National Organic
3 Standards Board. I recently moved to a new
4 profession professionally as the Director of
5 Marine Science at the Pew Charitable Trust.
6 That said, I want to make very clear that I'm
7 speaking today only for myself and not for
8 Pew, which has not established a position on
9 the proposed organic aquaculture standards.

10 I first want to thank the
11 Livestock Committee for all their hard work on
12 drafting standards for fish feed and net pens,
13 and I really appreciate all the time you put
14 in. I've seen it from a distance. That said,
15 I think the draft standards could benefit some
16 from further revisions, and I'm going to make
17 a few suggestions today.

18 The first thing I want to do is,
19 particularly to the net pen standards, to
20 emphasize the importance of a utility of using
21 performance standards. I think it's safe to
22 say now that there's a wide agreement among

1 people who worked on environmental issues that
2 it makes sense to use performance standards
3 when possible. In other words, to specify as
4 a standard a measure of impact that is de
5 minimis or acceptable.

6 Such performance standards have
7 several advantages. First of all, they help
8 to spur innovation, as they're not
9 prescriptive about which practices must be
10 used to achieve a goal. Second, they also
11 ensure that an environmental concern is
12 addressed, rather than simply prescribing
13 practices that must be followed and-- we hope--
14 - address an environmental impact.

15 As you well know from just today
16 and many other NOSB meetings, the
17 environmental impacts of net pens in
18 aquaculture are highly controversial. In my
19 eyes, many of them are well documented,
20 especially in salmon farming. Employing
21 performance standards provides a means to
22 ensure that these impacts are actually

1 addressed. And I'm delighted to see that the
2 Livestock Committee has recommended at least
3 some performance standards. The best example
4 is the requirement for the 50 percent
5 recycling of nutrients, by which I assume the
6 Livestock Committee intends to be nitrogen and
7 phosphorus, and a little clarity on that might
8 be useful.

9 That said, by drafting such a
10 measure, you're ensuring that environmental
11 goals are met, and you will meet the high bar
12 for organic production. Should the NOSB
13 choose to further revise the net pen
14 standards, I would really urge you to look
15 towards additional performance measures where
16 possible.

17 That said, I'd now like to talk
18 briefly about three issues with the proposed
19 feed standards. And as you're aware, there's
20 some very good policy and ecological reasons
21 not to allow wild fish in aquaculture feed
22 used in organic production. Some of these

1 were well described in Mark Bittman's article
2 on seafood which appeared in this Sunday's New
3 York Times and, I gather, was distributed to
4 you earlier this afternoon.

5 For practical reasons, the
6 Livestock Committee and the AWG both have
7 recommended a step-down provision to end the
8 use of fisheries products and feeds-- or at
9 least wild fisheries products and feeds.
10 However, I'm concerned about the ambiguity at
11 the end of this step-down process as currently
12 proposed.

13 The proposed standard in 205.612
14 reads, "The following non-synthetic substances
15 may not be used in organic aquatic livestock
16 production: fish meal and fish oil from wild
17 caught fish and other wild aquatic animals,
18 except"-- and the except provides for 12 years
19 of step-down, ending with an allowable five
20 percent inclusion rate in years 11 and 12.
21 But there's no mention of what happens in year
22 13.

1 So it's possible that this
2 standard could be interpreted as continuing to
3 allow fish meal and fish oil use. That's
4 clearly problematic, and I urge the NOSB to
5 clarify this language so it ambiguously steps
6 down to no wild fish.

7 Another issue that's critical to
8 address is the use of the word "sustainable"
9 to describe fish used in feed. Sustainability
10 is not so easy to determine, especially for
11 small in the food chain or forage fish
12 typically used in feed. Forage fish
13 populations play critical roles in marine
14 ecosystem health. Forage fish consume
15 plankton and become food themselves,
16 transferring energy throughout the marine food
17 web up to top predators.

18 By conventional fishery management
19 measures, most forage fisheries are actually
20 not in trouble. This is largely because these
21 measures focus on maintaining enough fish in
22 the water to replenish populations. However,

1 what conventional single species fisheries
2 management fails to recognize is the
3 compelling scientific rationale to leave
4 additional forage fish in the water to support
5 marine food webs.

6 Setting what are called total
7 allowable catch levels that account for the
8 ecosystem roles of these fish appears critical
9 to ecosystem health. The science of setting
10 such catch levels is emerging, although
11 several jurisdictions ranging from the state
12 of Washington to the country of Peru are
13 trying to do so. But the proposed standard
14 does not make clear the need for such
15 management. If the term "sustainable" is
16 used, I urge that language be added to make
17 clear that a sustainable forage fishery
18 encompasses an ecosystem definition of
19 fisheries management, not a single species
20 one. Another alternative would be simply not
21 to use the term "sustainable," but please
22 don't leave the recommendation as it is.

1 The final point I'm going to make
2 in two seconds, condense it, is that you have
3 a requirement in 205.105(f), which is a
4 provision that says that the amount of wild
5 fish that goes into feeding aquatic animals
6 cannot exceed one pound of wild fish product
7 fed for every pound of live cultured aquatic
8 animals harvested. You really should say wild
9 fish fed for every pound of aquatic animals
10 harvested. Otherwise, "wild fish product"
11 could be interpreted as "dehydrated fish," and
12 you end up with a lot more fish-in and fish-
13 out. Thanks a lot.

14 CHAIRPERSON DELGADO: Questions?
15 Thank you. Next is Marty Mesh, followed by
16 George Leonard.

17 MS. FRANCES: George Leonard sent
18 me an email that he couldn't be here, and he
19 offered to share with Shauna McKinnon. And I
20 don't know if she's to deliver oral comments
21 or just --

22 CHAIRPERSON DELGADO: Oral

1 comments. So next up will be George Kimbrall.

2 MR. MESH: My name is Marty Mesh,
3 and I used to have Bellevue Gardens Organic
4 Farm, which is still in existence. I serve on
5 the board of the Southern Sustainable
6 Agriculture Working Group on the board of the
7 Organic Trade Association, and none of my
8 comments should be interpreted as the OTA
9 policy as the Executive Director of Florida
10 Organic Growers and its certification program
11 of QCS.

12 I want to thank the Board and the
13 committees for all the work that you've done.
14 Thanks goes to the department. Welcome to the
15 new folks. It seems like they've already
16 left. And I wanted to say thanks to Richard
17 Matthews for his years of work if, indeed,
18 this is the last meeting that we'll see him.
19 Something tells me it probably isn't.

20 I did have a comment on the
21 meeting space and, you know, the public's
22 desire to have public comment and input and

1 watch and listen to the Board's work would
2 call for a little bit larger room that would
3 actually have people able to sit down.

4 I have some comments to make from
5 Elizabeth Henderson, an organic farmer, on
6 this seed issue, and so let me read those to
7 get them into the record. "I'd like to second
8 the comments in regard to commercial
9 availability and sourcing of organic seed (see
10 below), and I'd like to add the following
11 comments. As a farmer, I can tell you that
12 our farm has attempted to increase our use of
13 organically-produced seed. On our farm, we
14 grow a great diversity of crops and varieties
15 of those crops, over 250 varieties in all.
16 Every year, we try new varieties that are
17 organically-grown in our effort to replace
18 non-organically grown varieties. However, the
19 quality of at least some of those seeds is
20 really poor. For example, fully half of the
21 organic mammoth melting snow pea seed that we
22 used this year was not snow peas but some sort

1 of inferior shelling pea. Organic seed
2 potatoes are in short supply, very high in
3 price, and require expensive shipping.
4 Repeatedly, we have been given our money back
5 on organic potato seeds because it was
6 diseased. We submit a long list of non-
7 organic seed used to our certifier every year
8 explaining these problems. The NOSB
9 requirement to document calls, faxes, or e-
10 mails to seed suppliers does not make sense
11 for vegetable growers. We order seed from
12 catalogues, hard copy or online, and we should
13 be able to simply show that they consulted the
14 seed catalogues of three or more companies
15 that carry organic seed. Many thanks for your
16 attention. Elizabeth Henderson."

17 In Vermont, I'm getting farmers
18 who submitted formal comments that I have here
19 to read, if you'd like. And if I do read
20 them, you'll save yourself five minutes later
21 on from the Vermont person who will also talk
22 about pasture if I read them.

1 The bottom line is that we also
2 have concerns about the seed issue and urges
3 some caution as the young organic seed
4 industry blossoms and finds balance with the
5 regulatory overburden threat. I would like to
6 suggest the possibility of forming a working
7 group to come up with recommendations to
8 include the seed industry folks, growers, and
9 certifiers. I believe earlier today I did an
10 informal poll on the re-certifiers, farmers,
11 that were willing to serve on such a working
12 group to try to come to some bottom ground by
13 the organic seed industry folks, as well.

14 Fish. I'm hopeful that, as I have
15 stated for years, that the opportunity to move
16 forward with regulation for aquaculture, which
17 would allow innovative pioneers to
18 differentiate their products in the
19 marketplace. These folks would serve as
20 leaders and examples in how production teams
21 can be adopted and approved to improve not
22 only their own bottom line but as a solution

1 to global challenges in environmental damage.
2 We hope an aquaculture standard serves as a
3 challenge for aquaculturists, which many have
4 stated publically they're willing to try and
5 meet, not looking for a way to call what is
6 being done as organic.

7 I urge my colleagues in the
8 environmental and consumer communities to at
9 least embrace an opportunity for paradigm
10 change for an industry to be jump-started in
11 aquaculture. We've advocated for years, and
12 if we had gotten started then we would be
13 years down the road towards having an organic
14 aquaculture industry and the environmental
15 benefits that go with it.

16 I have a response to the person on
17 the orange pulp petition. I have a proxy.
18 The orange pulp position-- I'd like some
19 additional time to engage in discussions with
20 the petitioner, to do some research, and talk
21 to citrus folks in the organic industry to
22 form a more updated opinion. I noticed some

1 of his figures were old and outdated with 1999
2 and 2003 references.

3 Which brings me to okra, an okra
4 update. A follow-up to the okra situation,
5 FOG, Florida Organic Growers-- and no southern
6 okra grower has ever been contacted by the
7 petitioner or Campbell's, who mentioned that
8 you guys were interested as well in the
9 organic okra product-- or the petitioner,
10 General Mills, that I know of, with any
11 specificity such as variety desired, amount to
12 be contracted for, or any talk about fair
13 pricing or contract details.

14 For comments directed to me about
15 the clock is ticking, they should be more
16 directed to the petitioner or companies
17 wishing to use non-organic okra as to the
18 progress of outreach undertaken by them. I
19 still believe that this could be a great
20 poster child of a project if companies would
21 act fairly, responsibly, and put as much
22 attention to sourcing organic okra as they did

1 to petition it.

2 Maybe the rest of it is for
3 tomorrow. And if you want Vermont Organic
4 Farmers' statements, I have those documents.
5 I believe you've already received them in
6 written form from Vermont Organic Farmers.

7 Oh, the 100-percent organic. I
8 knew there was one more. We agree with Oregon
9 Tilth's positions. To save time, we won't go
10 into it. We certainly need clarity in the
11 industry, and as long as that organic sharing
12 pie that Richard was talking about could have
13 the oxygen taken out and put nitrogen in so
14 that it wouldn't spoil-- you know, the same
15 way as the organic coffee producers that
16 wanted to put nitrogen at the very top and
17 take the oxygen out so the coffee beans stay
18 fresh and call it 100-percent organic coffee,
19 then we support the position, and I confirm
20 that that was their intent as well, although
21 she didn't talk about the packaging flush.
22 Thanks.

1 CHAIRPERSON DELGADO: Is there any
2 questions? Steve?

3 MR. DEMURI: Do you have reason to
4 believe that there's a lot more organic orange
5 pulp available than what the petitioner has
6 told us?

7 MR. MESH: Without an opportunity
8 to do some more investigation and really look
9 at acreage and talk to people in the organic
10 citrus industry, I wouldn't want to go on the
11 record. You know, but the speaker-- again,
12 some of the data they show is 1999. This is
13 2008. While I recognize that data takes years
14 to sometimes assimilate, gather, and publish,
15 1999 data to encourage you all to approve a
16 petition for non-organic material-- or 2003
17 was the last reference, I believe, that I saw--
18 - seems at least to deserve a little bit more
19 updated attention to data. And I offered to
20 do that, and I offered to engage in
21 conversations with them, as well.

22 CHAIRPERSON DELGADO: Any other

1 questions?

2 MR. MESH: We also have a
3 transition program right now on organic citrus
4 in Florida to help growers reduce or eliminate
5 the use of pesticides. It's ongoing right
6 now, and with the farm bill, you know, we
7 believe that there's going to be more reason
8 for growers to transition. If you put
9 something on a list like that, you know, it's
10 one less reason of a byproduct that would be
11 available to them to sell.

12 CHAIRPERSON DELGADO: Any other
13 questions? Thank you. Up next, George
14 Kimbrall.

15 MS. MCKINNON: I'm actually going
16 to deliver the comments for George Leonard.
17 He prepared spoken comments, but it will be
18 quite quick.

19 CHAIRPERSON DELGADO: You desire
20 to get those comments out of the way?

21 MS. MCKINNON: Yes, I said that I
22 would.

1 CHAIRPERSON DELGADO: All right.
2 Go ahead, please. You've got five minutes.

3 MS. MCKINNON: So I'm speaking
4 today on behalf of George Leonard, who's the
5 Aquaculture Director at the Ocean Conservancy,
6 and he also submitted comments electronically,
7 which hopefully can be distributed to
8 everybody.

9 MS. FRANCES: You can e-mail
10 today.

11 MS. MCKINNON: Great. Yes, I
12 submitted them very late. So, on behalf of
13 George, thank you for the opportunity to
14 comment on the proposed organic aquaculture
15 standards for feed in net pens. Ocean
16 Conservancy has engaged in the NOSB's
17 deliberations on these issues over the last
18 several years through George Leonard's current
19 affiliation with Ocean Conservancy, as well as
20 previous affiliations with Monterey Bay
21 Aquarium. We commend the National Organic
22 Standards Board for their diligence in

1 attempting to resolve these substantial
2 challenges surrounding the concept of organic
3 in open net pen farming.

4 As the Board is all too aware, the
5 issue is both intellectually complex and
6 politically charged. A large number of
7 conservation, fishing and consumer groups have
8 been and continue to be opposed to fish meal-
9 dependent species grown in open net fence
10 systems being unable to receive the coveted
11 USDA organic label. There is considerable
12 merit to the arguments that have been made to
13 date before the NOSB.

14 At this stage in the debate, NOSB
15 must make a decision about which of the two
16 potential paths to pursue to resolve this
17 issue. The first and simplest path is to
18 exclude net pens and fish meal and oil-
19 dependent species from consideration of the
20 USDA organic label at this time. This would
21 allow U.S. organic fish farming industries to
22 develop a low trophic level species, such as

1 catfish, tilapia, and shellfish, while a
2 reliable source of organic feed is developed
3 and sustainability solutions for net pen
4 aquaculture are explored.

5 The second, and much riskier path,
6 is to allow wild fish net pens to move
7 forward, as reflected in the proposed organic
8 aquaculture standards. The success of the
9 second path is far from assured. It is highly
10 dependent on developing successful compliance
11 and verification procedures and seriously
12 risks the reputation of the organic label
13 through both consumer confusion and allowing
14 environmental degradation to occur under the
15 auspices of the USDA organic program.

16 Like many conservation groups,
17 Ocean Conservancy remains troubled that the
18 Board appear poised to pursue the second path.
19 We believe the most prudent approach is to
20 reject the proposed standards and return to
21 recommendation to exclude wild caught fish in
22 net pen systems at this time.

1 Should the NOSB move forward with
2 its current approach, we conclude that it must
3 fully embrace performance-based metrics
4 throughout all of the standards, and build a
5 robust mechanism for their verification for
6 the resulting standards and certified product
7 to be able to withstand public scrutiny. And
8 more formally making our case, in our written
9 comments we build on a discussion paper
10 authored by Cory Pete and George Leonard and
11 delivered at the NOSB Organic Aquaculture
12 Symposium in October 2007.

13 We conclude that should the NOSB
14 not be willing to fully embrace performance
15 metrics for wild fish in net pens and fully
16 support the development of a verification and
17 compliance system, then we would strongly
18 recommend that the Board choose to exclude
19 wild fish in open net pen systems from
20 consideration for organic status at this time.

21 Given the substantial
22 environmental challenges of these production

1 systems and the high expectations of organic
2 consumers, there's only one chance for the
3 NOSB to get it right. If the Board has any
4 doubt that these issues cannot be
5 satisfactorily resolved, the proposed
6 standards as written is ill-advised. Thank
7 you for your consideration of our comments and
8 for entertaining our written submission.

9 And I would just add one thing.
10 If you do have a chance, in the full
11 submission that George Leonard submitted last
12 night, he goes into great detail of what
13 performance metrics could be for each of the
14 impact areas, and it's definitely worth
15 reading through and considering.

16 MR. KARREMAN: George has given a
17 very extensive review of performance metrics.
18 I was just wondering, as far as everyone--
19 well, a lot of the people that would be
20 opposed to us moving forward on the second
21 path, as you say, always say, "why don't we
22 start slow and kind of explore net pens and

1 see how it goes." I just wonder what kind of
2 time frame would you think if we just had
3 tilapia and catfish starting in? What kind of
4 time frame do you think it would take in years
5 or decades to have enough fish meal and fish
6 oil for other species that need that for their
7 diet?

8 MS. MCKINNON: I'm definitely not
9 in the position to give you an answer on that
10 because I'm not an aquaculture researcher. I
11 can tell you that one of the biggest
12 innovation areas in aquaculture right now is
13 exploring the reduction of the use of wild
14 fish meal and oil because it's very expensive
15 and it's a limited resource. So there's a lot
16 of research going into substitutions,
17 including innovation and using algae. There's
18 one producer in B.C. that's looking at using
19 milk proteins as a substitute. You heard
20 earlier about Neptune Industries and using
21 insect feed as a protein source.

22 I mean, it's difficult to give an

1 answer to say what the innovation period would
2 be, but it's definitely something that's
3 moving ahead with or without the Organic
4 Program.

5 MR. KARREMAN: But shouldn't we
6 be, in general, for organic animals, feeding
7 them through their natural instinct of needs?
8 You know, at the symposium, we heard a lot
9 about feeding corn and soybeans, and then we
10 get the synthetic amino acids, and that sounds
11 a lot like poultry, which right now in the
12 organic industry are not fed actually their
13 natural diet at all. And so, you know,
14 philosophically, do you think it's ever going
15 to be possible to feed fucivorous fish what
16 they truly instinctively want, instead of
17 giving them an alternative substitute that
18 doesn't satisfy their natural behavior
19 actually?

20 MS. MCKINNON: Well, if you're
21 looking for a way to feed fucivorous fish that
22 have been expressing their natural behavior

1 and eating their natural diet, then wild fish
2 would be the choice you would make. So it
3 does raise the question, if there are fish
4 that can't fit within the Organic Program and
5 the current organic standards then it does it
6 make sense to include them in the program?
7 But I'm not expressing the opinion of George
8 Leonard at the moment. I hope he would agree
9 with me but--

10 MR. KARREMAN: Probably.

11 MS. MCKINNON: I can't say that
12 for sure.

13 CHAIRPERSON DELGADO: Any other
14 questions. Thank you very much. Moving on to
15 George Kimbrall, followed by Deborah Brister.

16 MR. KIMBRALL: All right. Good
17 evening. It's not afternoon anymore. I'm
18 going to try to keep this brief. My name is
19 George Kimbrall. I'm an environmental
20 attorney with the Center for Food Safety, so
21 I'll keep it brief because I'm tired and so
22 you all must be exhausted. And, secondly,

1 many of the colleagues here that have come
2 from other, the alphabet soup of non-profits
3 that have been present have provided
4 substantial comment on these aquaculture
5 issues and the environmental impacts thereof.
6 Also, I'm a lawyer and not a scientist, so
7 I'll try to stick to that.

8 The Center for Food Safety is a
9 non-profit membership organization that works
10 to protect human health and the environment by
11 curbing the proliferation of harmful food
12 production technologies and promoting organic
13 and other forms of sustainable agriculture.
14 CFS represents members throughout the country
15 that support organic agriculture and regularly
16 purchase organic products.

17 We've been part of this process
18 throughout, I think working on it since 2001.
19 This is my first time presenting in front of
20 the Board, so I appreciate the opportunity to
21 comment here today. We did file substantial
22 comments on the proposal, 25 pages, 100

1 footnotes or so, so I also would fall back on
2 that, as well as our earlier comments, for
3 anything that I leave open.

4 So along with the people that have
5 presented from Food and Water Watch and
6 Consumers' Union and Ocean Conservancy and
7 CAAR and anyone else that I left out, we're
8 opposed to the standards, and we stridently
9 urge the Board to rethink them and go back to
10 the drawing board on the standards. We don't
11 think they meet the high organic standard. We
12 think they undermine the organic standard.

13 With regards to the net pens,
14 you've heard quite a bit about the
15 environmental impacts. You know, the science,
16 I think, is pretty clear that escapes are
17 unavoidable, that there is the principle of
18 biodiversity and conserving that with regards
19 to organic that I think places another layer
20 on top of that and makes the idea of open
21 water net pens contrary in that way.

22 I mean, producing fish this way

1 may be the driving force behind the fish
2 farming market. I think it is. But we don't
3 think that's enough reason to mislead
4 consumers by applying to it the organic label.
5 Again, as others have said, we think fish in
6 closed systems where inputs are organic and
7 can be controlled and contained should be
8 certified organic. That's where we would
9 start.

10 One thing I haven't heard yet is
11 the use of the natural behavior standard. It
12 seems to me that the Committee's proposal is
13 somewhat contrarian in that it uses it with
14 regards to the feeds and expressly denies that
15 it applies with regards to the net pens. This
16 strikes me as classic arbitrary and capricious
17 behavior if there was a regulation
18 interpreting a statute. It cannot decide to
19 abide by the standard when it chooses only
20 when it suits its purpose, i.e. only for feeds
21 but not for net pens.

22 With regards to the fish feed

1 issue, CFS again believes that only wild
2 caught fish should not be used to obtain
3 "organic fish meal and fish oil," and that
4 allowing to do so is contrary to OFPA, the
5 implementing regulations, and the prior
6 recommendations of NOSB.

7 Feed of up to 25 percent is not a
8 supplement in any common sense meaning of the
9 word. Moreover, the definition of "fish meal
10 and fish oil" is as feed, not as a supplement.
11 Under the proposed rule or the recommendation,
12 fish meal would be considered livestock, which
13 is an agricultural commodity and therefore
14 feed and not a feed supplement or a feed
15 additive. This loophole that's created by
16 this proposal we think is much larger than
17 just aquaculture and creates a very bad
18 precedent that undermines the entire organic
19 standard in this way.

20 Nor is requiring the "sustainably-
21 sourced" label on wild fish a remedy for this.
22 The public would still be led to believe that

1 USDA approves of this practice by the
2 application of the organic seal. Since
3 sustainably-sourced is an unenforceable and
4 undefined standard, the label would be
5 misleading.

6 It is true that the Stevens Act
7 allows the possibility for wild fish to
8 eventually be labeled organic. However, as we
9 heard earlier today, we don't view this as an
10 implementing regulation outlying that statute.
11 Rather, we view it as an attempt to circumvent
12 any possible regulation along those lines by
13 using wild feed as a supplement as an end
14 around that regulatory requirement.

15 The reality is, there are
16 substantial, perhaps insurmountable,
17 challenges to labeling wild as organic and
18 that the wild label, as you heard earlier from
19 the Alaskan fisherman that was here, no longer
20 needs or wants it. Thank you.

21 In conclusion, CFS believes that
22 aquaculture systems that do not deploy fish

1 meal and fish oil and can meet the recommended
2 standards should be the first products to the
3 organic market. There are substantial gains
4 that can be made in displacing fish meal and
5 fish oil in the diets of some marine species,
6 and the desire to enter the organic market can
7 serve to further stimulate urgently-needed
8 research.

9 The Committee has stated that, to
10 quote, "only allow organic certification of
11 low trophic-level species would greatly limit
12 organic aquaculture under USDA standards."
13 This cannot possibly be a basis upon which to
14 allow organic certification. Yes, a different
15 standard would be more limited, but it would
16 also be meaningful.

17 So we call on the Board to reject
18 these standards on fish feeds in open water
19 net pens. Thank you.

20 CHAIRPERSON DELGADO: Any
21 questions?

22 MR. KARREMAN: Just one question

1 on the arbitrary and capricious activity of
2 the Board regarding the natural behavior being
3 suppressed by net pens, if I understand it
4 right from salmon farming, they usually start
5 running at about six years old, and the salmon
6 that are usually filleted are about 22 months
7 before they would ever run and go spawn. So
8 in a sense, it's not inhibiting their natural
9 behavior at the time that they would be
10 slaughtered. But also, parallel to land-based
11 agriculture, certainly there are pens that
12 stop animals from running around. I mean,
13 calves, baby calves, I would think you would
14 push for, have to be on the mother cows. I
15 would think, just in your logic right there,
16 have to be with mother cows, so I --

17 MR. KIMBRALL: I think it's apples
18 and oranges, frankly. I think that's part of
19 the problem within organic aquaculture
20 standard. You know, it's a different beast
21 entirely. So you have to make those
22 logistical changes to address it, but we also

1 don't have wild herds of cows roaming around,
2 we have to worry about becoming genetically
3 deformed based on escapes of farm-raised cows.
4 I mean, we have a surviving, thriving
5 commercial hunting/gathering society here on
6 the one hand, and the impacts there are going
7 to have to be taken into consideration.

8 With regards to the natural
9 behavior, I think you're respectfully, you
10 know, cutting hairs. I mean, I think, yes,
11 maybe there's a difference there, but no one
12 is going to say that a salmon's natural
13 habitat is in a confined net pen. They're
14 migratory fish. They travel thousands of
15 miles, you know, across the oceans. So I will
16 respectfully disagree.

17 MR. KARREMAN: What do you think
18 about closed containment for fish? Not net
19 pens, but closed containment where they are
20 steel barrel in a shed? Is that not hindering
21 their natural behaviors?

22 MR. KIMBRALL: Well, I mean, I

1 think that's not what the proposal is in front
2 of us.

3 MR. KARREMAN: But we're just
4 talking about natural behavior. I know, I
5 mean, with the net pens and all that, I'm not
6 going there. I'm just saying you brought up
7 the natural behavior, so I am, too.

8 MR. KIMBRALL: Well, I can only
9 comment on the proposal in front of me, which,
10 as I said, I think is an arbitrary and
11 capricious interpretation of the standard if
12 it was a proposed rule.

13 CHAIRPERSON DELGADO: Any other
14 questions? Thank you. Moving on, we have
15 Deborah Brister, followed by Lisa Engelbert.

16 MS. BRISTER: Hello. I'd like to
17 thank the Board for the opportunity to speak
18 to you today about organic aquaculture
19 standards. My name is Deborah Brister, and
20 I'm a research fellow at the University of
21 Minnesota.

22 I stood before the Board nearly

1 ten years ago, and at that time I made
2 recommendations of a greater degree of
3 participation by those in the aquaculture
4 sector and other stakeholders was needed for
5 the development of organic aquaculture
6 standards before they were implemented. This
7 led to the first ever organic aquacultural
8 workshop held at the University of Minnesota
9 and the creation of a number of national and
10 international organic aquaculture working
11 groups. I'm happy to know that this
12 recommendation has indeed come to fruition.

13 Today I'd like to share a few more
14 comments that I have regarding the September
15 28 draft recommendations, and then let you
16 know about a tool that we've developed at the
17 University called an aquaculture
18 sustainability matrix, which we're now using
19 as a systematic way to compare various organic
20 aquaculture standards.

21 So first my comments. I'd like to
22 commend the Livestock Committee and the

1 Aquaculture Working Group for their excellent
2 work on developing organic aquaculture
3 recommendations. I'm glad to see that the NOP
4 will now consider allowance of fish meal and
5 oil as possible aquatic animal feed
6 ingredients. It's never made sense to
7 recommend that fish that are naturally
8 piscivorous be required to consume feeds made
9 from vegetable sources when they do not
10 naturally eat them. Of all the types of equal
11 labels out there for seafood, organic is the
12 one equal label that should guarantee that
13 organic piscivorous fish eat what they would
14 normally eat in the wild.

15 I'd like to encourage the
16 Livestock Committee to simplify one section in
17 the recommendations that's difficult to
18 understand, and it does need clarification.
19 The section I'm referring to states this, and
20 I'll read it because I think to hear it you
21 can get a sense of the need for more
22 clarification. Section 205.252(d) states,

1 "Feeds for aquaculture products for human
2 consumption must contain lipids from fish oil
3 or other omega-3 sources produced by
4 microorganisms or other organic plants to meet
5 the nutritional requirement of specific lipids
6 for the particular aquatic species, except
7 that other lipids from organic sources may be
8 provided in feeds for aquatic animals that
9 have specific dietary requirements for such
10 ingredients to the extent necessary to meet
11 the minimum requirement for that lipid in that
12 aquatic animal." That's like the longest
13 sentence I've ever seen. It does need some
14 clarification. And one recommendation I would
15 have would be maybe modify the section just
16 above it, 205.252c, and state simply, "Aquatic
17 animals must be provided with their natural
18 feeds and lipids consistent with the need to
19 optimize health and growth of the aquatic
20 animal."

21 I'd also like to commend the
22 Livestock Committee for including net pens

1 within the organic aquaculture standards
2 recommendations. I think it's extremely
3 important to provide an opportunity for all
4 types of aquaculture systems to at least have
5 an opportunity to try for organic
6 certification as a goal. Not only does this
7 encourage innovative thinking by
8 aquaculturists who want to pursue organic
9 certification, but it then demonstrates to the
10 conventional aquaculture sector what is
11 possible, thereby raising the bar for net pen
12 operations overall.

13 I've got a couple of other -- how
14 am I doing on time? I have one minute? Okay.
15 So I do have a couple of other comments about
16 the recommendations, so if you want to ask me
17 after I'm done, I'll be happy to share it.

18 In my remaining time, I'd like to
19 discuss with you a long-term project that we
20 at the University have been developing for a
21 number of years. The aquaculture
22 sustainability matrix, which is a tool that

1 I've presented at a number of conferences in
2 recent years, including most recently the
3 United Nations Workshops on Aquaculture
4 Certification held in Thailand, China, Brazil,
5 India, and the United States. During the
6 Brazil workshop, I presented this FA working
7 paper that I've handed out to you just now, so
8 you've got that in front of you.

9 Recently, I've been working with
10 colleagues to do comparisons of independent
11 organic aquaculture standards using the
12 matrix, and I'm also currently using the tool
13 to assess recommendations for organic
14 aquaculture standards between the United
15 States and Europe.

16 So as you know, especially from
17 our previous speakers, the European organic
18 aquaculture standards are actively being
19 developed right now, and the European
20 Commission is actually hoping to finalize
21 those standards by January of 2009. Another
22 gentleman said maybe in three or four months,

1 and I think that's actually more realistic
2 right now.

3 But because of the market
4 potential for organic aquaculture products in
5 both the United States and Europe, we feel
6 it's very important that the organic standards
7 for aquaculture be as harmonized as possible
8 to reduce potential trade barriers. Other
9 organizations have done side-by-side
10 comparisons between standards, but we feel
11 there's a better way to assess these
12 standards. The very nature of standards
13 development usually involves taking previously
14 established standards and then building on
15 them. And in this way, it's possible to miss
16 some elements of sustainability, which all --

17 CHAIRPERSON DELGADO: Your time is
18 up. Wrap up, please.

19 MS. BRISTER: Okay. Which truly
20 all organic standards should raise eventually
21 if they're continuing to compete in the
22 marketplace with other equal labels seafood.

1 So all I wanted to say is that I am doing a
2 comparison right now. It will be done in
3 approximately two weeks. I will be submitting
4 it to the European Commission, and I would
5 also like to submit it to the NOSB, as well.
6 Okay. Thank you very much.

7 CHAIRPERSON DELGADO: Any
8 questions? Okay. Thank you very much. Next,
9 Lisa Engelbert. Lisa? Okay. Let's move on
10 then to --

11 MS. FRANCES: Lisa goes tomorrow.

12 CHAIRPERSON DELGADO: Tomorrow.
13 On both cases?

14 MS. FRANCES: Yes.

15 CHAIRPERSON DELGADO: Very good.
16 Thank you for that. Keith Olcott? Are you
17 here? Great. Please, come up, and he will be
18 followed by Peggy Miars.

19 MR. OLCOTT: Okay. I'm not here
20 to talk about aquaculture. We're way back to
21 multi-site certification. And I compliment
22 you all on your endurance. I'm sure Dante

1 didn't have any clue about this particular
2 circle of hell.

3 So I'll just preface this by
4 saying Equal Exchange is one of the largest
5 fair trade companies in the United States.
6 We've been around for over 20 years now. We
7 have direct relationships with growers, 33
8 small-scale organizations in 19 countries
9 throughout Latin America, Africa, and Asia.
10 And each year, many of our folks, purchasers,
11 quality control staff visit our producer
12 groups, virtually all of whom are cooperative
13 and use what you allude to in your document as
14 the multi-site certification. We would like
15 to respectfully suggest that you call it group
16 grower certification, because we would like
17 the emphasis to be very much on growers
18 exclusively, at least in this part of your
19 program.

20 So we commend the CACC for
21 incorporating many of the suggestions raised
22 in the May `08 meeting. And since we've

1 already submitted a copy of our comments where
2 we want to tweak that just a little bit, we
3 think you're like 97 percent there. I just
4 want to focus on a few points that other
5 organizations have raised as concerns about
6 the current recommendation, and I want to
7 speak to those.

8 So specifically I'm referring to
9 the recommendation for a \$5,000 threshold for
10 taking growers out of multi-certification
11 status, the restriction on production units of
12 100 individuals or ten square kilometers, and
13 the idea that multi-site certification should
14 not be recognized as a distinct category of
15 accreditation. This is an accretion from
16 various groups speaking to various points.

17 All these points have been
18 addressed to one degree or another in previous
19 testimony at the November meeting and the May
20 meeting. And the CACC presumably has digested
21 that, and I actually don't see any of those
22 presently stated in the current

1 recommendation, and we're pleased with that.
2 These points were addressed, for example, by
3 the National Organic Coalition, OCIA, IOIA,
4 and IFOAM, not necessarily all of the points
5 by all of these groups.

6 In our estimation, a well-executed
7 internal control system can address the issues
8 of scale, be they monetary, numerical, or
9 geographical. The one notable exception that
10 triggered all of these discussions about group
11 grower certification, there was a long history
12 of success employing this method of
13 certification. Likewise, the intricacy and
14 rigor involved in a well-designed internal
15 control system is precisely why it should be
16 recognized as a distinct category of
17 accreditation, and other people spoke to that
18 earlier today talking about the rigor that's
19 involved and the training that should be
20 involved with these ICS groups. So that's why
21 we think it should be recognized as a distinct
22 category.

1 We are concerned that the
2 monetary, numeric, and/or geographical
3 thresholds might make sense to employ in the
4 United States-- might make sense. But they're
5 not necessarily appropriate or effective
6 thresholds to employ across the board
7 throughout the developing world.

8 So just a quick example with the
9 \$5,000 limitation. That could be a logistical
10 and organizational hardship for some of our
11 producer partner cooperatives because the
12 value of some of the commodities we buy-- for
13 instance, coffee-- can vary dramatically from
14 year to year. And somebody had suggested
15 perhaps you would average a two-year period,
16 but that might not suffice either. So you can
17 imagine the situation where if there's good
18 crop years and bad crop years, people would be
19 in and out, in and out of the organization and
20 how would you keep track of that as a
21 certifier?

22 And I think I'm just going to have

1 to wrap it up there as one example. There's
2 more in that document that I gave you.

3 CHAIRPERSON DELGADO: Thank you.
4 Questions from the Board. All right. Thank
5 you very much.

6 MR. OLCOTT: Thanks. Oh, there is
7 a question.

8 CHAIRPERSON DELGADO: Tracy?

9 MS. MIEDEMA: Just very quickly.
10 I read your comment very closely, you know, at
11 the key stakeholder group, the coffee growers
12 you represent, opinions really need to be
13 brought to the floor. And I did want to ask
14 you a question about-- in your written comment
15 you referenced IFOAM World Board resolution
16 back in June, and you characterize it as,
17 basically, that the IFOAM World Board was
18 strongly rejecting any possibility of an
19 internal control system model being extended
20 to any other groups besides grower groups.
21 And the gist of your written comment really
22 focused on keeping this construct solely for

1 growers, and then you stated the resolution,
2 and I was just curious how you interpreted
3 that motion 29.7 as strongly rejecting the
4 possibility? I read it quite differently, and
5 I just wanted you to connect the dots for me.

6 MR. OLCOTT: Well, now I might
7 have to read it again now that you put it that
8 way. Obviously, as part of the National
9 Organic Coalition, that's something we came to
10 all together. I know someone else can speak
11 to that in their testimony. But the way I
12 read it and the way you read it is so
13 completely different, can somebody jump in on
14 this? Okay. Maybe we should defer?

15 MS. MIEDEMA: We can wait until
16 then. That's fine. Thank you.

17 CHAIRPERSON DELGADO: Another
18 question from Dan.

19 MR. GIACOMINI: As you read the
20 recommendation that was put forth, breaking
21 the grower group into production units and
22 then with subunits, what would be -- your

1 Equal Exchange is a grower group, is that
2 right?

3 MR. OLCOTT: No, no. We're a fair
4 trade wholesaler, basically in the United
5 States. We buy --

6 MR. GIACOMINI: Okay, okay, okay.
7 I apologize for that.

8 MR. OLCOTT: That's okay.

9 MR. GIACOMINI: But in your
10 experience of working with these groups, what
11 proportion of the grower subunits in a typical
12 production group would be over the 5,000
13 threshold in a typical year?

14 MR. OLCOTT: I don't have the
15 statistics. It can vary from country to
16 country. So I could try and get that
17 information for you, but I can't say on
18 average this number of people would be over.
19 But in some years, in some countries for some
20 products, it could be significant. For
21 example, with cocoa right now, chocolate is
22 through the roof, so it could be a significant

1 number of cocoa producers right now.

2 Alternatively, the bottom could fall out of
3 the market and then . . .

4 CHAIRPERSON DELGADO: Any other
5 questions? Bea?

6 MS. JAMES: Just as a follow-up to
7 Tracy's question, so does Equal Exchange, does
8 your organization have a position one way or
9 another as far as other sectors being able to
10 model multi-site certification?

11 MR. OLCOTT: We think right now it
12 should be, the recommendation as it currently
13 exists should apply only to grower groups, so
14 I'm not saying it should preclude other
15 groups, but I think it should be a separate
16 scope of work.

17 MS. JAMES: Okay. So the way that
18 it's written, just to have a specific one for
19 farmers but that you're saying that if there
20 was the possibility of a different construct
21 using that, that it should be addressed
22 separately?

1 MR. OLCOTT: Right.

2 MS. JAMES: Okay.

3 CHAIRPERSON DELGADO: Any other
4 questions? Okay. Thank you very much. Up
5 next is Peggy Miars, and I understand you have
6 a proxy, correct?

7 MS. MIARS: I do have a proxy,
8 but, don't worry, I'm not going to go anywhere
9 near ten minutes. So good evening. It's kind
10 of like being at a really great party and the
11 hardy partiers are still here and the rest
12 have wimped out. It's fun.

13 So I'm Peggy Miars. I'm Executive
14 Director of California Certified Organic
15 Farmers, and we are here representing 2,000
16 certified operations, a half a million acres
17 in certified farmland, and 80 percent of the
18 organic farmland in the state of California.

19 My first comments were going to be
20 about the Sunset procedures, but I believe,
21 Dan, you addressed our comments this morning,
22 which seemed like yesterday, because our

1 comments were about how to amend an
2 annotation. And I believe what you said this
3 morning was to handle them through the
4 petition process. However, that isn't clear,
5 and we would request that it be clarified
6 somewhere in the policy manual, wherever it's
7 appropriate.

8 The next topic is the grower
9 groups, and we do want to thank the Committee
10 for the work that you've done on this issue.
11 And it is the third time that CCOF has
12 submitted comments opposing grower groups
13 under the NOP. And we believe strongly that,
14 in order to maintain the integrity of the
15 organic standards, that all producers must
16 complete the entire certification process,
17 including on-site annual inspections.

18 We do continue to oppose the
19 concept of multiple production units and,
20 therefore, oppose recommendations in this
21 document that imply acceptance of those units.
22 And I heard Joe a few times today say that the

1 document was intended to not include
2 processors and retailers, but, as you heard
3 from other presenters today, that's not clear.
4 I think it should clearly exclude those groups
5 under the NOP.

6 So we do want to state again that
7 we have concerns about grower groups in
8 general, and we do believe that the
9 applicability of multi-production units to
10 retail and processing is unacceptable.
11 However, we do realize that we're in the
12 minority, and so long as grower groups are
13 allowed, we agree with the minority opinion
14 that all new operations should be inspected
15 when they enter the group. And as long as
16 grower groups are allowed, we believe, as
17 others have said, that they should only be
18 allowed for small holders with less than
19 \$5,000 in U.S. organic sales.

20 The next topic is the list for
21 inerts. And we do appreciate the fact that
22 the Board is taking up this topic, and we're

1 eager to participate in future discussions and
2 share the expertise that some of our folks in
3 CCOF have. However, this discussion paper did
4 come out a bit late before the comment period
5 deadline, and we did not have time to assemble
6 the information that was requested. Since
7 most inerts in pesticide formulations are
8 confidential, we typically rely on the organic
9 materials from Washington State Department of
10 Agriculture to obtain the disclosure of those
11 inerts.

12 Of the few that we have reviewed,
13 we do know that the inerts are used as
14 carriers, adjuvants, anti-foaming agents, UV
15 inhibitors, emulsifiers, and preservatives.

16 And we do have one brief comment
17 about the concept of reviewing each inert
18 individually. It's very hard to get the
19 information to complete a petition or a TAP
20 review for many of the inert substances.
21 There's not much data about their effects in
22 the environment, and because many of them are

1 considered to be trade secrets there's not
2 that much data disclosed about the
3 manufacturing methods. So a requirement to
4 review each one could eliminate a huge number
5 of products in the organic production. We do
6 urge the NOSB and the NOP to work closely with
7 the EPA to address this issue, and I
8 understand that there is going to be someone
9 from the EPA here.

10 Next item, pet food standards. We
11 appreciate the work that's been done on this.
12 We do believe that specific language is needed
13 for pet food in the rule, which will enable
14 that category to further grow. We do agree
15 that the labeling should be similar to the
16 labels for human food. Consumers that
17 understand human food labeling will easily
18 understand the pet food labeling.

19 And as far as where it falls in
20 the rule, I know that Gwendolyn brought up
21 possible separate section, so I would suggest
22 that you take a look at that. So we're

1 pleased to support the proposed recommendation
2 and ask you to move those forward.

3 Very, very briefly on pasteurized
4 almonds. I wasn't going to talk about this,
5 but it was brought up earlier. That is a
6 major concern for almond growers in
7 California. It was explained this morning, so
8 I won't go into great detail, but there are
9 two things that are happening with organic
10 almond growers in California. You did hear
11 that California provides all the almonds for
12 the country, organic almonds. We're concerned
13 because, as you heard, imports from other
14 countries are allowed to be sold in the United
15 States unpasteurized, whereas growers in
16 California are required to pasteurize them, and
17 that's a major concern. I realize that's not
18 anything that you can do anything about, but
19 you need to be aware of that.

20 And as you heard, the organic
21 almond growers are losing market share because
22 of that, and they're really concerned. And

1 what I have heard from people is that if they
2 continue to lose that market share, they're
3 just going to get out of organic entirely, and
4 we would hate to see that.

5 I, again, want to encourage this
6 Board to hold meetings in other parts of the
7 country. At the last meeting, I heard you say
8 that you wanted to hear from more organic
9 farmers. California has got more organic
10 farmers and more organic acreage than any
11 other state, and I urge you to hold a meeting
12 in California or somewhere on the West Coast
13 so that organic producers there have an
14 opportunity to speak to you directly. And I
15 would also say that we at CCOF would be really
16 pleased to line up some organic farm tours for
17 any of the committee members that are
18 interested.

19 My last comments are probably more
20 directed at the Program staff. Regarding the
21 certifier training that's being talked about,
22 as you heard earlier, the certifiers who

1 really need it don't tend to show up. So I
2 would request that that be made some sort of
3 a requirement, that it be addressed in the
4 accreditation process, and handle it that way.

5 And then we're grateful about the
6 budget increase and with the increased staff,
7 which were really great to see. We urge you
8 to focus on materials reviews and enforcement
9 activities as your top priorities. Thank you.

10 CHAIRPERSON DELGADO: Questions?
11 Bea?

12 MS. JAMES: Thank you for your
13 comments. I was wondering if you could
14 elaborate why you think just retailers in
15 particular, why that construct would not, that
16 internal control system would be a higher risk
17 than a farmer grower group?

18 MS. MIARS: Well, and I would put
19 retailers and processors together into one
20 group when I'm talking about this. And I
21 don't know if the issue would be a higher risk
22 so much as perception or, excuse me, the

1 intent of the original rule, which I believe
2 was to support the small growers, primarily in
3 the third world countries who are couldn't
4 either afford to do this or they were in areas
5 that were so remote that it was going to be
6 difficult to get to them for inspections. So
7 that's how I would make that distinction.

8 MS. JAMES: So it mostly has to do
9 with the cost that you think there's an
10 association between the retailer having more
11 funds available?

12 MS. MIARS: I would say so, yes.

13 MS. JAMES: But as far as just
14 philosophically, a retailer being able to
15 follow a good internal control system using a
16 multi-site construct, would you think that
17 that's something that would be acceptable?

18 MS. MIARS: Can you repeat that?

19 MS. JAMES: Just the concept, if
20 you take away the piece that has to do with,
21 you know, the financial capability of a
22 retailer being able to do that, there are some

1 small retailers, co-ops, that own more than
2 one location that don't necessarily have as
3 much funds as some other retailers that
4 perhaps would have more, so there are examples
5 of that, that if you were to just remove that
6 completely, the idea of a retailer being able
7 to follow a good internal control system using
8 a multi-site construct in their certification,
9 is that something that you think would be
10 feasible?

11 MS. MIARS: Well, I think I need
12 to correct something that I just said, which
13 is to put the retailers and the processors
14 together. When you ask the question that way,
15 I would separate them out because retailers,
16 as you said earlier today, are not required to
17 be certified. It's voluntary. Therefore, if
18 it's voluntary, they should meet the highest
19 standards of the rule, and they should be
20 inspected annually. And as I said, the intent
21 there was for the small growers and the
22 retailers are optional. Am I making myself

1 clear there?

2 MS. JAMES: Yes. I'll probably
3 catch you afterwards.

4 MS. MIARS: Sorry. It's late.

5 CHAIRPERSON DELGADO: Any other
6 questions? Okay. Thank you very much. Let's
7 move on then to Katherine Dimatteo, followed
8 by Jim Riddle.

9 MS. DIMATTEO: Okay. Thank you
10 very much for waiting to hear from me all day.
11 My name is Katherine DiMatteo. Now that I
12 have ascended to the presidency of the IFOAM,
13 International Federation of Organic
14 Agriculture Movements, I have been corrected
15 by my Italian members that I have always
16 pronounced my name wrong.

17 So thank you very much for your
18 good work, your attentiveness. I have passed
19 around the comments that we submitted
20 electronically. I'm not sure if you've all
21 had a chance to read them. It's just for your
22 convenience. I'm also going to just summarize

1 quickly the comments that you did receive on
2 group certification or multi-site
3 certification. You received plenty of
4 comments electronically, 19 of which supported
5 the principles and concepts of the CACC
6 recommendation. Many of those comments did so
7 without any changes whatsoever. Ten of the
8 twenty comments supported the IFOAM position,
9 half of which did so unconditionally. So just
10 a quick summary of what you received
11 electronically in case you didn't read all of
12 those.

13 I have a few things from my
14 written comments just to emphasize. IFOAM
15 thanks you, the CACC, for recognizing the
16 variety of farms and farm organizations that
17 exist worldwide. The continued acceptance of
18 group certification is cortical for the growth
19 of the organic sector and for securing and
20 improving the livelihoods of thousands of
21 small holders and thousands of growers, small
22 or otherwise, in developing countries and in

1 other countries around the world.

2 IFOAM is pleased that the focus of
3 this recommendation is on producer groups and
4 believes that if multi-site certification is
5 to be extended throughout the supply chain in
6 the future, this will require the development
7 of additional sector-specific criteria. So in
8 answer to the question about our motion at the
9 general assembly, that motion that was passed
10 by the general assembly that was referred to
11 in a number of comments said, basically, that
12 our goal is to ensure that producer groups are
13 able to continue to be certified organic under
14 a group certification scheme but that we
15 support the framework that allows for future
16 consideration of additional criteria for the
17 other sectors, and that's what our general
18 assembly agreed on by majority vote and that
19 is the position that we bring forward to you
20 today.

21 I also want to emphasize that we
22 cannot judge other people by the standards

1 that we set for ourselves economically here in
2 the United States. And I think that it would
3 be a travesty to set a \$5,000 limit for the
4 individual members of the grower groups. I
5 think we have no basis for doing that. Are we
6 wanting to say that they're limited in the
7 income that they can ever have? Are we saying
8 that they should never be part of a group, a
9 collective, of people that are growing
10 together and are learning together and are
11 learning from each other's experiences, having
12 continuous improvement by the benefit of being
13 with other groups? So I really urge you not
14 to try to limit this by using either
15 geographic or monetary or other types of
16 limitations. And, in fact, we very much
17 support the way that the recommendation is
18 currently written because it does, in its
19 criteria for groups and in its criteria for
20 sampling and for the internal control system,
21 really addresses all those things. And as you
22 read that recommendation, I think you need to

1 read it with that eye that the guidance is
2 there for making the decisions about what can
3 and cannot work in groups with smart
4 management and how those groups should be
5 divided so that they can be adequately and
6 efficiently and effectively managed.

7 A few other points. We do not
8 support the minority opinion that all new
9 entrants are immediately a high risk location
10 and that we recommend that the assessment of
11 which members classify as high risk be left to
12 the accredited certifying agent based on the
13 criteria that's been recommended in the CACC
14 recommendation.

15 And I think the last thing that
16 I'd like to point out from my written comments
17 is that IFOAM appreciates the overall
18 reasoning for sampling, the attention given to
19 risk factors and the determination of the
20 sampling procedure, and the conclusive remark
21 on the relevance of the internal control
22 system to detect non-conformities. IFOAM

1 recognizes the efforts made by the CACC to
2 reach agreement on sampling guidelines that
3 are not overly prescriptive for certification
4 bodies and that accommodate for various group
5 conditions.

6 I really urge you to, in your
7 deliberations and consideration, to move this
8 recommendation forward and to not, again, lean
9 towards prescription. One of the things that
10 we used to say about agriculture when we all
11 were talking about a different alternative
12 system, including organic, we talked about the
13 reductionist thinking that was applied to
14 conventional agriculture. X amount of pounds
15 of pesticides applied at periodic points
16 during your production. Do that, and you will
17 be, you know, you will be successful. You
18 know, here's a formula, like a recipe, that
19 you can follow on your farm. I'm really
20 hoping that organic doesn't move in that
21 direction where we rely solely and expect
22 testing and/or very prescriptive requirements

1 to be the basis of what determines what an
2 organic system is. Thank you very much.

3 CHAIRPERSON DELGADO: Thank you,
4 Ms. DiMatteo, and congratulations on your
5 wonderful, wonderful election. Any questions
6 for Ms. DiMatteo? Yes, sir?

7 VICE CHAIRPERSON MOYER:
8 Katherine, thanks for your comments. One
9 question. Do you see the need to limit the
10 number of people who would be in a grower
11 group?

12 MS. DIMATTEO: I think that that -
13 -

14 VICE CHAIRPERSON MOYER: -- grower
15 group would be established?

16 MS. DIMATTEO: No. I don't think
17 you should limit a total number for the grower
18 group because I think that the situation is
19 going to be different everywhere we go. The
20 situation that, you know, of tea, for
21 instance, or cocoa or even coffee, you know,
22 there may only be one or two plants that are

1 part of a default group, so it would take a
2 large group to have sufficient quantity to be
3 efficient and to be able to sell to large
4 wholesalers who would want that product.
5 Otherwise, the cost wouldn't even, you know,
6 merit the farmer from selling the product, and
7 they wouldn't have that market.

8 So I think that the breakdown into
9 production units should handle that. So if
10 you have a very large group, you know, it
11 should be broken down into production units
12 that are based on either the geographic
13 region, the number of farmers, you know, in a
14 particular location or the number of farmers
15 that can be effectively managed through the
16 internal control system. And I think that
17 those are the things when a certifier is
18 looking at that plan from the group that they
19 should determine whether the decisions about
20 how to manage the group, whether those are
21 good decisions, and they should ask for
22 changes to those decisions about how to break

1 into production units, ask the group to change
2 those if the certifier believes that they're
3 not going to be able to manage the size of
4 their groups. Does that answer the question?
5 Okay.

6 CHAIRPERSON DELGADO: Any other
7 questions from the Board? Okay. Thank you
8 very much.

9 MS. DIMATTEO: Thank you.

10 CHAIRPERSON DELGADO: And up next
11 is Jim Riddle.

12 MR. RIDDLE: Say who's on deck
13 before I start?

14 MS. FRANCES: Sam Welsch is on
15 deck.

16 MR. RIDDLE: Thank you. Good
17 evening, and I do have a proxy from Joe Dietz,
18 OCIA seat committee chair. I want to thank
19 you all for being here still, and I especially
20 want to thank the NOP staff for your hard work
21 in getting the pasture proposed rule out. I
22 want to thank you, Rick, for all of your work

1 over the years. You've written a good rule.

2 I also am very appreciative of the
3 new staff that's been brought on board, I
4 think that's really a good move, and the
5 training plans that I've heard about today.
6 I do encourage that, as that training moves
7 forward, that it utilize existing technical
8 experts, including IOIA, the International
9 Organic Inspectors Association, as well as
10 some of the emerging resources through
11 extension, because that's USDA funded and
12 let's really maximize our resources and put
13 them to work well.

14 I am now Organic Outreach
15 Coordinator at University of Minnesota. And
16 when I appeared before you in May, I mentioned
17 about the eOrganic project, developing organic
18 information resources electronically through
19 extension, and I'd just like to give an update
20 and let you know that that is moving forward
21 to launch with an official rollout at the Eco-
22 Farm Conference on January 20th. So that is

1 moving forward.

2 So with that, I'll remove my
3 university identity and shift to some comments
4 in support of those from OCIA regarding the
5 seed recommendation. I do support the Crops
6 Committee's draft. I think you've heard a few
7 comments today to polish some parts of it.
8 That's fine, but I think that draft should
9 move forward. It provides some good guidance.

10 The one issue that it does not
11 address is the issue of treated seed and
12 limitations that places on access to genetic
13 materials. And I heard my name referenced
14 that I'm advocating that treated seeds be
15 allowed, and that's not exactly true. What I
16 am advocating is that the Crops Committee
17 consider an exemption to allow licensed seed
18 producers to use treated foundation seed stock
19 in the production of organic seed, to consider
20 it, to have a thorough discussion of this, and
21 to get the data to know how much of a problem
22 this is. I ask you to add this to your Crop

1 Committee work plan and consider forming a
2 working group of seed industry, farmers, and
3 others, certifiers, to really gather the
4 information on this and some of the other
5 issues not addressed in your current draft.

6 The thing that got me on this was
7 the realization that an organic farmer has to
8 try to get organic seed. But if they can't
9 find it, it's not commercially available, they
10 can use totally conventionally-grown untreated
11 seed.

12 And the organic seed producer
13 cannot do that to produce an organic seed.
14 The system is rewarding the conventional seed
15 industry using conventional practices to
16 provide these untreated seeds that are being
17 used to produce organic crops, and that's
18 really unfair and it's not in anyone's best
19 interest. So I think there's some
20 discrepancies, discrimination, that needs to
21 be addressed and look at this to see if there
22 should be an allowance.

1 There's two ways of going about
2 it. One would be a petition to place all
3 these different possible seed treatments on
4 the National List for a very limited
5 annotation. But the other, to look at the
6 rule in 205.204(a)(5), which currently allows
7 the use of treated seed when application of
8 materials required by federal or state
9 sanitary regulation. That's a blanket
10 allowance without listing those individual
11 materials in a given situation.

12 So there already is a precedent
13 for something similar where there could be
14 consideration of a blanket allowance for
15 licensed seed producers to used treated
16 foundation stock seed when untreated
17 foundation stock seed is not commercially
18 available. And one of the problems is a lot
19 of these foundation seeds are only grown out
20 maybe every five years, and then they're
21 treated and put in the bank. And for someone
22 wanting access to those genetics, they simply

1 aren't available anymore.

2 So there's some limitations, but I
3 want you to study it. I've received some
4 anecdotal and some information be submitted
5 tomorrow from OCIA, but I think it's a serious
6 issue that should be on your work plan.

7 Okay. Some of the other things
8 that are up for discussion or vote at this
9 meeting I'd like to comment on. First, I
10 would really like to thank the CACC for the
11 improvements that you've made to the grower
12 group certification recommendation. I think
13 that it integrated the 2002 recommendation and
14 then addressed some of the deficiencies in it
15 and has really good criteria for regulating
16 and moving that whole system forward.

17 I do think there is some confusion
18 in the introductory paragraphs. They aren't
19 in the guts of the recommendation, but that's
20 where you heard some comments today where it
21 still kind of goes back and forth of whether
22 it's about processors or just producers. And

1 I hear that it's only producers, and that's
2 what I read in the body, but there's some of
3 the introduction that makes that unclear.

4 For retail chains, though, when I
5 go into a store, say Super Target, and it says
6 the name of an accredited certifier and it
7 says inspected to guarantee compliance with
8 U.S. standards and has the USDA seal, I
9 understand that that store is actually
10 inspected, and they haven't been. And I'm
11 glad the NOP has cracked down through
12 accreditation and said that's not allowed, but
13 it is confusing and misleading to consumers.

14 But I invite you to be creative in
15 how you address the retail situation. And one
16 possibility, instead of applying this grower
17 group model, would be to use the existing
18 regulatory infrastructure. Retail stores get
19 inspected all the time. Why can't the
20 inspectors that go in those stores cover off
21 organic compliance, just as well as health and
22 accuracy of scales and all the other things

1 that they're regulating? Let's be creative
2 and look at different solutions without
3 weakening the consumer perception that a store
4 is indeed inspected.

5 I'm glad you have the biodiversity
6 on your work plan discussion document there.
7 I endorse the comments the Wild Farm Alliance
8 will be making and think that it is a
9 requirement in the rule. It's inherent in the
10 definition of organic production, and it
11 should be addressed during the accreditation
12 process to see what certifiers are doing to
13 check on those existing requirements.

14 I was pleased when Barbara said
15 earlier that the training will be based on
16 organic system plans for a portion of the
17 training. I think that's really smart. It's
18 something a lot of certifiers already have
19 adopted, the forms that the Board has
20 recommended and ATTRA has up. And this is
21 going to be increasingly important because
22 there will be a crosswalk between organic and

1 NRCS on the organic system plans. But in my
2 comments I submitted before the meeting, it's
3 come to my attention two important questions
4 are not being asked about post-harvest
5 handling on the farm OSPs about cleaning
6 methods and pest control, and I provided those
7 in detail.

8 My major concern, though, today,
9 what you have before you is the materials
10 review change to the Board policy manual
11 that's being proposed. Defining a TAP, and
12 this is from your language, "Group of third-
13 party experts convened by the program to
14 provide a technical review related to a
15 material petitioned under review by the NOSB.
16 A subcommittee of the NOSB may comprise a
17 TAP." Two big problems with that.

18 First, the law says the Board
19 shall convene technical advisory panels. Your
20 draft says the Program, so I think you need to
21 bring it into compliance with the law. You
22 say it's a group of third-party experts. A

1 subcommittee of the Board is not third party.
2 That's yourselves. You need a third-party
3 expert. So those are a couple of problems I
4 see with that. I ask you to just hold on
5 that, give it further consideration.

6 Get legal counsel on this. If you
7 haven't had OGC or some legal counsel, this is
8 a huge legal issue. You need to comply with
9 the law. It's not just a Board policy manual
10 issue. Thank you.

11 CHAIRPERSON DELGADO: Thank you.
12 Any questions? Dan?

13 MR. GIACOMINI: Yes, Jim, we do
14 need to do some tweaking on some of those
15 things, but this document, the technical
16 review document, actually does come from legal
17 recommendations and the Program dealing with
18 the process of TAPs and technical reviews in
19 light of 606 and all those things. That's
20 where this document comes from. It's not just
21 us wanting to come up with another document
22 and put more stuff in the policy and

1 procedures manual.

2 MR. RIDDLE: Well, a lot of the
3 recommendations of the Board have background
4 that cites the law, cites the regulation.
5 This does not, and was that just the Program
6 opinion or was this OGC saying --

7 MR. MATTHEWS: Office of General
8 Counsel saying that the Board can do be its
9 own TAP.

10 MR. RIDDLE: No, no. The question
11 I have is about the Board shall convene TAPs,
12 not the Program shall convene but the Board,
13 the law says the Board --

14 MR. MATTHEWS: Oh, well, yes, the
15 Board. But OGC has determined that the Board
16 can convene a TAP committee of itself.

17 MR. RIDDLE: Okay. But then you
18 should change the language because that would
19 not be a third party.

20 CHAIRPERSON DELGADO: Any other
21 questions? Bea?

22 MS. JAMES: You know, I like the

1 idea of thinking creative on how retailers can
2 actually become certified, but I've heard a
3 couple of inspection agencies come up here and
4 say that they've had difficulty just getting
5 their inspectors to attend training. How then
6 would you envision state inspectors becoming
7 educated enough to be able to perform these
8 inspections?

9 MR. RIDDLE: Yes. Well, there are
10 states that are running functioning organic
11 certification programs so state employees can
12 conduct organic inspections right now, and
13 they can multitask and do other things, as
14 well. So I think the model is there. There
15 are some states that could be, you know,
16 looked at or piloted. We're going to have a
17 lot more people trained throughout the system.
18 NRCS is going to be doing a lot more training,
19 extension are getting up to speed, and I think
20 that the regulatory side can, as well.

21 The certification of retailers is
22 voluntary, so there's an opening here to do

1 something creative. They've already got
2 plenty of inspectors coming in their door, and
3 I think this has a lot more long-term
4 sustainability. It cuts miles; you're not
5 flying people all over the world to do these.
6 These are already coming to the stores. Plus,
7 it broadens the regulatory net, so to speak,
8 of organic. It brings more people into that.

9 MS. JAMES: I don't disagree with
10 that. I guess I just would want to go on
11 record saying that we need a solution for
12 retailers sooner than when I think that would
13 probably be --

14 MR. RIDDLE: Yes, well, the
15 solution is there, individual inspection of
16 each operation.

17 CHAIRPERSON DELGADO: Julie?

18 MS. WEISMAN: That's okay because
19 Bea actually asked a question that I had.

20 CHAIRPERSON DELGADO: Jennifer?

21 MS. HALL: Jim, with regard to
22 grower groups, do you have a feeling on when--

1 MR. RIDDLE: Oh, on the new
2 growers? Well, how do you ever start a grower
3 group? That's my problem with it. I think
4 you've created really good criteria that is
5 risk-based and it empowers the certifier to
6 make those determinations. If anything, there
7 probably should be more unannounced
8 inspections occurring of grower groups, you
9 know, just as a check there because there is
10 a larger risk factor that you've introduced.
11 But as far as just new growers, if it's a
12 functioning ICS, they're going to be getting
13 the training, they're going to be using the
14 inputs, they're part of a legal entity. I
15 don't think that that's the biggest risk here.
16 But it does put a limit on how do you start a
17 new one as a grower group because they're all
18 new members, so they all have to be
19 individually inspected. Why would you ever
20 start a new one if, you know, every operator
21 has to be individually inspected to start off
22 with? That's not a grower group anymore.

1 CHAIRPERSON DELGADO: Any other
2 questions? Thank you.

3 MR. RIDDLE: Thank you.

4 CHAIRPERSON DELGADO: Moving on
5 to, do we have Sam or not? No? Okay. Moving
6 then to Beth --

7 MS. FRANCES: Claudia Reid.

8 CHAIRPERSON DELGADO: Claudia
9 Reid.

10 MS. REID: Good evening. This is
11 my very first NOSB meeting, so I was going to
12 start off by asking you not to ask me any
13 questions, but I think I don't have to say
14 that. You probably don't want to ask me any
15 questions. I do have a proxy, but I really
16 doubt I'll need to use it.

17 I'm going to be speaking to four
18 issues very briefly: materials procedures;
19 procedures to handle technical reviews; tabled
20 materials status; and one of the petitioned
21 materials, ethylene on pears.

22 Our comments have, my set of

1 comments have to do with the materials
2 procedures because, as you probably know, CCOF
3 is one of the oldest and largest certification
4 organizations, and we have provided the
5 background for much of the work that you have
6 all originally done here at the NOSB and by
7 the industry for materials review. Thus, we
8 feel uniquely concerned that the NOSB be able
9 to continue to provide this thorough
10 objective, high-quality evaluation of existing
11 and new substances currently being considered
12 for the National List.

13 My name is Claudia Reid, and I'm
14 the new Policy Director for CCOF.

15 On procedures to handle technical
16 reviews, CCOF agrees with the premise behind
17 your recommendation that the NOSB often
18 requires specialized expertise for review of
19 petitions. The NOSB should not feel obligated
20 to be a technical advisory panel, though.

21 We liked, you had five phases in
22 that document and we liked numbers one, two,

1 three, four, and six, but we really felt that
2 phase five was incomplete. We recommend that
3 you add another bullet to that phase five,
4 another bullet point to phase five, that would
5 provide technical expertise in addition to the
6 NOSB for reviewing the reports, especially
7 when there's an alternative to the substance
8 in the organic production system. I don't
9 know if that makes sense now hearing all these
10 other 12 hours' worth of comments. This was
11 written before, 12 hours ago.

12 On the status of tabled materials,
13 the recommendation to take from the table
14 previously tabled petitioned substances, we
15 really, really were impressed with the work
16 that you did. And I know one of our staff was
17 involved in that, and she is just amazed at
18 how much work it was and how hard you all
19 worked.

20 As you will see in our previously
21 submitted written comments, we make a
22 distinction between the materials listed in

1 your recommendation that were tabled and which
2 we feel were already officially set aside
3 following the 2000 Federal Register Notice and
4 a number of other items that were actually
5 petitioned but never dealt with by the NOSB.
6 You heard somebody else bringing this up
7 earlier this morning, too, this same issue.

8 Our written comments list those
9 materials along with a brief description of
10 what we feel happened to each one of those
11 petitions. And I'm not going to read those
12 names to you. They were actually several of
13 the names of the materials that were read
14 earlier today.

15 Our clients are still waiting for
16 answers on several of those items, and we urge
17 the NOSB to move these petitioned items to the
18 NOP for consideration instead of just setting
19 them aside. Our comments on these items don't
20 reflect a position one way or the other on the
21 material. We just simply want to have them
22 moved forward. We are requesting a full TAP

1 review of these materials and the appropriate
2 NOSB evaluation for each of these before we
3 take a position.

4 Clarification of the definitions
5 on the National List. We have participated in
6 the work of the Materials Committee, one of
7 our staff people has, and we applaud your
8 efforts on this hugely time-consuming job. We
9 do have a concern that the amount of work that
10 goes into this might take away valuable time
11 and energy from the very basic work almost
12 completed by NOSB in the year 2006 regarding
13 synthetic and non-synthetic determinations and
14 the associated terms, such as extraction,
15 purification, and formulation.

16 Several petitions are being held
17 up until this matter is finalized, and there
18 are other petitions being held up until there
19 is more guidance about the definitions.

20 We strongly urge you to take up
21 the 2006 recommendations again. Put them up
22 for public comment, if necessary, and take

1 action to resolve those unresolved issues.

2 And on ethylene and pears, using
3 ethylene for ripening bananas and pineapples
4 made sense to CCOF because neither one of
5 those commodities are grown on the continent
6 of the U.S. We do have organic citrus growers
7 in California who would like to petition to
8 remove ethylene for de-greening of citrus
9 because it's being abused by importers. They
10 are using it to mask unripe imported fruit and
11 then it gives all of organic citrus a bad
12 name, a bad reputation.

13 We would like to ask that the NOSB
14 consider this type of situation potentially
15 happening when you looked at ethylene for
16 pears. The potential misuse of ethylene, was
17 that considered in the review for pears?

18 We are dismayed at this statement
19 in the NOSB recommendation that, quote,
20 "Consumers miss out on several of organic
21 pears because without the use of ethylene
22 organic fruit of acceptable quality cannot be

1 distributed."

2 The consumer expectation of
3 having access to pears all year long is not a
4 criterion by which this petition should be
5 judged. We also ask for a truly objective
6 evaluation of alternatives to ethylene to be
7 completed.

8 That was it. Nice and short. I
9 think it was like six minutes.

10 CHAIRPERSON DELGADO: Any
11 questions for our speaker? Well, thank you
12 for your presentation. Next up we have Kathie
13 Arnold. Okay. So next then we have our last
14 speaker for the night, Barbara Blakistone.

15 MS. BLAKISTONE: Good evening.
16 I'm Dr. Barbara Blakistone from National
17 Fisheries Institute. I'm the Director of
18 Scientific Affairs. The NFI is the nation's
19 leading advocacy organization for the seafood
20 industry. It's member companies represent
21 every element of the industry from fishing
22 vessels at sea to the national seafood

1 restaurant chains, from responsible
2 agriculture to a marketplace supporting free
3 trade, to ensuring consumers have the facts on
4 the health benefits of fish and shellfish.
5 NFI and its members support and promote sound
6 public policy based on scientific research.

7 The National Fisheries Institute
8 urges the Livestock Committee to complete its
9 work so that final rule-making can begin on
10 organic standards for aquaculture. We know
11 consumers eagerly await the USDA organic label
12 for aquaculture fish.

13 NFI looks to the Aquaculture
14 Working Group as key advisors for the
15 outstanding technical issues of net pens and
16 fish feed. And so NFI supports the
17 recommendation and asks the Livestock
18 Committee to take them into serious
19 consideration to enhance the organic standards
20 process.

21 A number of AWGs recommendations
22 have been incorporated. More important ones

1 are detailed in the AWG report that have not
2 been taken into account by the Livestock
3 Committee.

4 We note some of particular
5 significance to NFI in the AWG report on fish
6 feed and related management issues. Point
7 one, we find the term aquatic livestock and
8 aquatic crops oxymorons and worthy of
9 revisiting in the final language of the
10 proposed organic aquaculture standards. We
11 recognize that terms define livestock, part
12 205.2, must include aquatic animals in the
13 definition but agree with the Aquaculture
14 Working Group that nomenclature must carefully
15 differentiate aquatic from terrestrial. Terms
16 like aquatic livestock and aquatic crops are
17 not commonly used and are confusing, and we
18 favor terms such as aquatic animals and
19 aquatic plants.

20 Point number two, the Aquaculture
21 Working Group has recommended adding language
22 into part 205.252 that states a limit on the

1 amount of wild forage fish, menhaden, herring,
2 anchovies, that can go into feeding aquatic
3 animals, specifically one pound of wild fish
4 fed for every pound of live weight of cultured
5 aquatic animals at harvest. No limit is being
6 proposed for recovered trimmings from wild
7 fish in order to encourage use of the
8 remaining carcass for organic fish feeds. NFI
9 very much favors the effort towards
10 sustainability, in this case recycling of the
11 fish.

12 Point three, in the section noted
13 in point two, the use of composted manure has
14 been excluded from the test even after the
15 Crops Committee carefully reviewed the use of
16 compost manure to fertilize aquatic plants
17 intended for organic fish and asserted that
18 its use presents no health hazard to humans.
19 NFI agrees with the AWG and commends the group
20 in support of the use of this sustainable
21 cycle, such as composting, to recover valuable
22 nitrogen and carbon.

1 Point four, we will not argue that
2 the organic seafood standards document might
3 not be the place for this notation but
4 wholeheartedly support AWG's point that if
5 wild caught sustainably-sourced fish meal or
6 oil fed to organic aquatic animals must be so
7 designated on the package, then such fish meal
8 or oil fed to organic terrestrial animals must
9 also be designated. The organic consumer
10 deserves a level playing field.

11 Again, as we commented above, NFI
12 defers to the technical knowledge of the
13 aquatic Aquaculture Working Group on the
14 report on net pens and related management
15 issues.

16 However, when AWG's comments red
17 flag that a zero-impact standard for
18 management of predators in part 205.254 is
19 unnecessary, the total prevention of disease
20 will never be achieved as required in part
21 205.255 and that a 50-percent minimum
22 performance target for all nutrients is

1 unnecessary in part 205.255 to achieve
2 limiting discharge of macro nutrients. NFI
3 asks if the Livestock Committee has raised the
4 bar above what is reasonable. Where there are
5 overzealousness in these particular areas
6 block organic seafood standards for some years
7 to come.

8 NFI looks towards rule-making in
9 early 2009 but only after the language
10 proposed in these standards by the Livestock
11 Committee reflects what is the current state
12 of science and technology of aquaculture.
13 Thank you for this opportunity to speak.

14 CHAIRPERSON DELGADO: Okay.
15 Questions?

16 Hugh?

17 MR. KARREMAN: Thanks for your
18 comments. And you started and you also
19 finished by saying the standard based on
20 science and, you know, that's always a good
21 sound basis to be in. But I know, just in the
22 public sphere, science doesn't always win the

1 day totally. And so, actually, and the
2 opposing viewpoints also have their science,
3 right? I mean, they do, and we've had a
4 symposium. So I'm just kind of wondering,
5 you're pretty much in favor of what we're
6 proposing with some AWG language changes and
7 all that, but how would you respond to all the
8 opposition that's out there, as far as what
9 they have to say? I'm just curious. We have
10 to balance that out in our decisions, you
11 know. It's pretty strong.

12 MS. BLAKISTONE: That's why I'm
13 not on the Board.

14 MR. KARREMAN: Okay. Fair enough.
15 I just thought I'd give you a possible . . .

16 MS. BLAKISTONE: I know the
17 opposing views and, yes, they're very
18 difficult to negotiate, and the process enters
19 into the scientific process. We've got to
20 find a medium. You'll never satisfy everyone,
21 but you try to get the majority.

22 CHAIRPERSON DELGADO: Any other

1 questions? Well, thank you very much. That
2 concludes tonight's list of speakers. Thank
3 you, members of the Board, for your patience,
4 and thank you, members of the Board, for your
5 endurance.

6 We will meet tomorrow at 8:00
7 promptly, and I would remind the Board members
8 that our dinner is waiting for us outside, and
9 we'll be eating in this room.

10 (Whereupon, the foregoing matter
11 was adjourned at 8:08 p.m.)
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