

National Organic Program (NOP) Listening Session  
Comments by the Center for Food Safety  
September 20, 2011

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Hello. My name is Colin O'Neil and I am the Regulatory Policy Analyst with the Center for Food Safety.

CFS believes that the ability to strictly adhere to organic agriculture and food production standards must drive the types of certified organic products that are made available to consumers in the marketplace. And, the desire to create and market a product that is "certified organic" must not compel the contortion or dilution of existing organic standards.

This is our litmus test for ensuring organic integrity.

As the government program charged with ensuring organic integrity,<sup>1</sup> we understand the difficulties in balancing diverse stakeholder needs in your decision-making process and that issues affecting organic integrity may at times be out of your direct control. Still, we believe that the NOP could be more proactive in its efforts to protect organic integrity with respect to three critical issues: 1. preventing GE contamination of organic crops and seed, 2. directing government-funded research on organic, and 3. prohibiting organic aquaculture in open ocean net pens.

As rightly stated in the NOP April 15<sup>th</sup> Memo on GMOs and Organic:

Since organic certification is a process-based standard, presence of detectable GMO residues alone does not necessarily constitute a violation of the regulation. The NOP relies on organic certifiers and producers to determine preventative practices that most effectively avoid contact with GMOs on an organic operation.<sup>2</sup>

Although technically correct, this narrow response to the growing threat of GE contamination of organic is inadequate and does little to retain public confidence in the organic label. Nearly 100 people expressed their concerns about GE contamination of organic to the NOSB in April, even though the issue was not on the Board's agenda. As these unsolicited comments suggest, the organic community expects the NOP to do more about GE contamination or risk decreasing public confidence in its ability to ensure organic integrity.

To that end, CFS urges the NOP to enter into a Memorandum of Understanding (MOU) of "shared responsibility" for GE contamination prevention of organic with APHIS. The MOU would set the stage for mandating GE technology users to share responsibility for preventing contamination, along with the organic farmers who are already doing so, by providing training and education on GE contamination prevention practice standards.

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<sup>1</sup> The stated mission of the NOP on its website is: "Ensuring the integrity of USDA organic products in the United States and throughout the world." <http://www.ams.usda.gov/AMSV1.0/nop>.

<sup>2</sup> McEvoy, Miles. (2011). "Policy Memorandum: Clarification of Existing Regulations Regarding the Use of Genetically Modified Organisms in Organic Production and Handling," 15 April, p. 1.

As an advocate of organic integrity, CFS finds it discouraging to see the NOP repeatedly extend approvals for substances on the National List, instead of sunsetting them because there is a lack of available alternatives. Antibiotic use in organic apple and pear production provides a case in point. After being on the National List for more than ten years, the NOP, again, extended their use until 2014. Unfortunately, we are already hearing from organic apple and pear growers that they are not likely to meet this deadline, due to the absence of viable alternatives.

Consumers view organic as the healthy alternative for the many highly processed foods on the market. When they decide to purchase organic foods, they do not expect them to be grown with antibiotics, much like they do not expect them to be irradiated or genetically engineered. The continued allowance of antibiotics, and the long list of other synthetics in organics, is another area where we believe the NOP could do more to ensure organic integrity. A whole systems approach to researching and troubleshooting problems in organic production systems, and finding solutions that are not mere input substitutions, is needed to combat the trend to expand the National List.

We urge the NOP to initiate a collaborative process whereby it communicates the Program's pressing research needs to the Research, Education, and Economics (REE) Mission Area staff on a regular basis. This way, government-funded organic research would be directed towards solving entrenched issues within the NOP and factored into the Request for Applications development process, for both OREI and the Organic Transition Program. It would also facilitate the sunsetting of materials on the National List, and improve organic integrity.

CFS believes that farmed, carnivorous fish can never be certified organic because they cannot be grown in open-ocean net pens without escapes and without causing significant and adverse impacts to aquatic ecosystems.

Therefore, we do not support the NOSB's recommendation for the NOP to draft organic carnivorous fish farming standards. The recommendation to allow wild caught fish, fish meal and fish oil to be used in carnivorous organic aquaculture contravenes the spirit and intent of OFPA, which requires all other certified organic species to be fed a 100% organic diet. If allowed, such practices would increase pressure on already over-exploited or recovering fisheries that form the base of the aquatic food web, and undermine OFPA's biological diversity conservation requirements.

CFS urges the NOP to take a proactive stance on organic aquaculture to ensure organic integrity by rejecting the NOSB's recommendations. Instead, we urge the NOP to direct the NOSB to go back to the drawing board and develop recommendations for inland organic herbivorous aquaculture, grown in highly controlled systems where inputs, outputs, and fish health and welfare can be monitored and regulated.

Thank you.



September 13, 2011

Mr. Miles McEvoy  
Deputy Administrator  
National Organic Program (NOP)  
US Department of Agriculture  
Jamie L. Whitten Federal Building  
1400 Independence Avenue, SW  
Washington, D.C. 20250

Dear Sir:

Your August 11, 2011 Memorandum for the Chairperson of the National Organic Standard Board (NOSB) acknowledged and accepted their April 2011 recommendations, including their recommendation to remove the 20% annotation on sodium nitrate. The recommended removal of this annotation would completely prohibit the use of sodium nitrate in organic crop production. If NOP promulgates a final rule removing the annotation, sodium nitrate could not be used as a fertilizer, an ingredient in a fertilizer, or a soil amendment in organic crop production after October 12, 2012.

We are very concerned that NOSB's actions came in direct response to your September 21, 2010 action memorandum requesting prohibition of sodium nitrate to help NOP harmonize U.S. organic standards with those of certain other countries and facilitate international trade in organic products. Acknowledging that equivalency agreements or trade considerations are not among its review criteria, the NOSB nevertheless voted to disallow sodium nitrate, justifying its decision on the basis of misinterpreted agronomic and scientific evidence and overlooking evidence of strong public support for continued use of sodium nitrate presented before and at the meeting. If promulgated by NOP into U.S. organic standards, the NOSB decision would be a grave error; it would harm U.S. organic agriculture, discriminate against organic producers in cooler regions of the U.S., and set an unfortunate precedent.

This letter chronicles the significant missteps NOSB made at its April 2011 meeting, and provides compelling evidence that NOP should not ratify the NOSB decision with rulemaking.

Key points:

1. There is strong support for continued use of sodium nitrate with 20% annotation;
2. Disallowing sodium nitrate would adversely affect small organic producers and discriminate against producers in more temperate regions of the U.S.;
3. There are no good alternatives to sodium nitrate for conditions where it is needed;
4. Sodium nitrate is not an environmental contaminant;

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5. Life cycle energy costs for sodium nitrate are unlikely to exceed that for manure;
6. Use of sodium nitrate is consistent with organic agriculture's sustainability focus;
7. Production of organic foods for vegetarian diets depend on sodium nitrate;
8. U.S. organic agriculture policy should not be dictated by foreign policies; and
9. The NOSB decision on sodium nitrate was not well made.

The following is a detailed discussion of these points:

1. There is strong support for continued use of sodium nitrate with 20% annotation.  
More than 300 organic farm organizations from 40 states submitted comments on NOSB's website in favor of retaining the status quo with sodium nitrate, and 540 farmers in 21 states signed a petition to preserve their right to occasionally include sodium nitrate in a balanced organic nutrient management plan. However, the NOSB did not acknowledge the broad support for continued use of sodium nitrate with the 20% annotation, and implied the industry did not support continued use. NOSB's decision ignores the fact that organic farmers in 29 different states purchased sodium nitrate in 2010 to augment their organic nutrient management plans. We formally present these comments and the petition to you as attachments to this letter.

2. Disallowing sodium nitrate would adversely affect small organic producers and discriminate against producers in more temperate regions of the U.S.

Sodium nitrate has proven to be a valuable contribution to the success of organic agriculture. It provides organic producers in temperate climates the means by which they can compete with producers in warmer regions. An NOP rulemaking to codify NOSB's recommendation to disallow the use of sodium nitrate would impose adverse economic impacts on the organic farmers of temperate areas of the U.S. These are farmers who rely on sodium nitrate as a necessary nitrogen source for the production of organic vegetables and other crops under conditions of cool weather and cold soils that prevent release of nitrate from the organic sources (e.g., animal manure, crop residues) that make up the bulk of their nutrient management strategies. Removing this valuable tool will disadvantage organic farmers in these regions relative to organic competitors in warmer regions. Many organic farmers are small businesses, with annual receipts of \$750,000 or less, as defined by the Small Business Administration. 13 CFR 121.201. Under the RFA, whenever USDA is developing a proposed rulemaking it must prepare a regulatory flexibility analysis that describes impacts of the proposed rule on small entities. 5 U.S.C. 603. The RFA requires USDA to determine if a proposed rule may impose a significant economic impact on a substantial number of small entities. If the answer to that question is yes, then USDA must prepare a formal analysis of the potential adverse economic impacts on small entities, participate in a Small Business Advocacy Review Panel (proposed rule stage), and prepare a Small Entity Compliance Guide (final rule stage). If the answer is no, then USDA must certify under the RFA that the rule will not have a significant economic impact on a substantial number of small entities. (See 5 U.S.C. 605(b) requiring such a certification if the agency believes that the requirements of the RFA do not apply). Compliance with the requirements of the RFA is subject to judicial review. 5 U.S. C. 611.

3. There are no good alternatives to sodium nitrate for conditions where it is needed.

Sodium nitrate is only needed occasionally during the growing season, but when it is needed there are no good alternatives. Its use is limited by the annotation to less than 20% of the total annual nutrition for the crops being produced. Sodium nitrate can be dissolved and applied as an aqueous solution, broadcast, drilled, or used as a side dress. It is a particularly effective fertilizer for organic agriculture because it has a neutralizing effect on soil and subsoil acidity, and does not volatilize to the atmosphere as ammonia. Sodium nitrate is readily available to crops when applied to soils during times of low rainfall and cold weather, or acidic soil conditions. It overcomes the cold-soil inhibition of nitrification and 120-day no planting rule that limit applications of animal manure, and makes nitrogen available when crops need it. Fish oil fertilizer has been discussed as a substitute for sodium nitrate, but generally when mixed with sodium nitrate to provide needed plant-available N. Much of the U.S. domestic winter and early spring production of organic vegetables is accomplished in 40 – 50 degree soil temperatures to supply the marketplace that asks for fresh produce 52 weeks a year. NONE of the organically approved N fertilizer sources (other than sodium nitrate) will convert from protein to the nitrate form under these conditions, and cool season vegetable crops WILL NOT GROW without a nitrate N source. Organic farmers know well that there are no good alternatives to sodium nitrate when it is needed.

4. Nitrate from sodium nitrate is a critical nutrient, not an environmental hazard as the NOSB concluded.

Regardless of the source – whether from manure, blood meal or sodium nitrate – nitrate is nitrate, and plants need it for growth and reproduction. Nitrate can be supplied to crops by the natural breakdown of soil organic matter, by the decay of proteins in root and leaf tissues from previous crops, and by fertilizers such as animal manure, blood meal, compost, sodium nitrate fertilizer, and others. It is counterintuitive to consider sodium nitrate an environmental “contaminant” when every other source of nitrogen also supplies nitrate to crops. It is also incorrect for the NOSB to consider sodium nitrate to be regulated by the Clean Water Act as a contaminant. The Clean Water Act *does not* regulate sodium nitrate fertilizer or its use. The Safe Drinking Water Act has a standard for public water systems in cities that dictates purification methods to remove excess nitrate from all sources in raw water sources, but this does not apply to the use of sodium nitrate fertilizer. Any source of nitrate can become a surface water or ground water contaminate – whether the nitrate comes from stormwater runoff of agricultural nutrients, livestock feedlots and manure lagoons, or home septic tanks. Opponents of sodium nitrate use in organic agriculture also have asserted that sodium will accumulate in soils when sodium nitrate is used. Manure actually contributes more sodium to the soil per unit of applied nitrogen than sodium nitrate. Since the use of sodium nitrate is limited by the annotation to less than 20% of the total nutrition, and sodium is a very mobile ion, at typical application rates in organic production it is highly unlikely to accumulate in any but the heaviest of clay soils. For the vast majority of agricultural soils, sodium nitrate use is well adapted.

5. Life cycle energy costs for sodium nitrate are unlikely to exceed that for manure.

When calculating the life cycle energy costs of agricultural inputs, it's important to consider all aspects of energy use. For example, animal manure use energy costs include not only the costs of collecting, handling, storage and spreading of the manure on fields, but the energy costs of producing the grain and processing, storing and shipping the feed that animals consume. On the other hand, sodium nitrate is mined in Chile as a byproduct of iodine production, and shipped to the U.S. for use as fertilizer. At the mining site it is estimated that 57% of the energy used for crushing, ore movement and evaporative separation of sodium nitrate comes from directly captured solar energy – not fossil fuels. And most of the fossil fuel used is needed to extract the iodine, not the sodium nitrate. Transport by cargo ships in bulk is energy efficient, even from Chile. Furthermore, sodium nitrate is easier to store and apply than manure and other organic sources, shortening the supply chain and reducing labor needs.

6. Use of sodium nitrate with other sources of nitrogen is consistent with organic agriculture's sustainability focus.

Critics of sodium nitrate claim its mined source is depleting a natural resource. For more than 100 years, sodium nitrate has been mined from ancient mineral deposits in the Atacama Desert of Chile. At the current rate of output, the deposits will last for *many more centuries*. Sodium nitrate is produced as a byproduct of the efforts to obtain iodine, a mineral essential to human health and welfare. Just as *other mined agricultural inputs* are authorized for use in organic farming – gypsum, greensand, langbeninite, sulphate of potash magnesia (Kmag, SuperMag, etc.), phosphates and potassium sulphate – natural sodium nitrate use allows the recycling of nutrients from the earth back into agricultural soils. However, unlike sodium nitrate, these other fertilizers are not by-products. Incorporating sodium nitrate with a 20% annotation into broad-based nutrient management is consistent with both organic production and sustainable agriculture.

7. Production of organic foods for vegetarian diets depend on sodium nitrate.

High on the list of requirements for vegetarian diets is the absence of animal waste in the production of these foods. Sodium nitrate offers organic producers the opportunity to certify a portion of their production “animal waste free” for these vegetarian markets. Similarly, use of sodium nitrate in a timely way for organic leafy vegetable production allows producers to avoid the 120-day harvest delay for food safety when manure is used alone.

8. U.S. organic agriculture policy should not be dictated by foreign policies.

Complete equivalency does not exist between the various North American and European base organic regulations and will most likely stay that way, unless the U.S. system is willing to capitulate and allow the Canadians and Europeans to use antibiotics in livestock and *synthetic* fertilizers in crops – materials that U.S. organics prohibit. The NOP should establish policies that support domestic organic standards, rather than be dictated by eagerness to harmonize with

foreign policies. There are many organic farming inputs allowed in Europe but prohibited in the U.S. that hinder international trade of organic products. Such inputs include sulphate of potash, a highly-soluble fertilizer allowed in Europe in its *synthetic* form but banned for U.S. organic production. Others include aluminum calcium phosphate, basic slag, and degelatinized bone meal. However, the U.S. NOP has raised equivalent trade policy concerns for *natural* sodium nitrate. Domestic organic policy should not be driven by foreign standards. It is inappropriate to discriminate against sodium nitrate on the basis of harmonization of international organic production policies. Such an approach is outdated, for IFOAM has realized that a strict global organic equivalency was not a realistic objective, despite its previous efforts toward that goal. They recognized that each region has its own particularities, and that global equivalencies is “mission impossible!” (See: [http://www.ifoam.org/about\\_ifoam/standards/family\\_of\\_standards/family\\_of\\_standards.html](http://www.ifoam.org/about_ifoam/standards/family_of_standards/family_of_standards.html)). The particularities of the U.S. in terms of climate, geography and trade justify the use of sodium nitrate where this may not be justified in other parts of the world (e.g. tropical regions) where other particular inputs would be justified instead.

9. The NOSB decision on sodium nitrate was not well made.

The NOSB decision-making process to remove sodium nitrate from the list of approved inputs for organic agriculture production suffered from confusion, failure to consider information made available to it, and outside influence. The transcript of the meeting records the following evidence that the decision was not well made:

- Confusion: Up the moment of the final vote, NOSB members repeatedly expressed confusion about what they were voting for, the implications of the alternatives being presented, and the procedures for the vote. Until the NOSB vote, the Crops Committee chair played a key role in guiding the discussion against sodium nitrate, only to withhold his vote at the end. If he knew he had business conflicts, he should have withheld his comments throughout the discussion and not simply withheld his vote.
- Alternatives: The NOSB Crops Committee provided no evidence that alternatives to sodium nitrate exist that are effective for the purposes organic producers in temperate climates require. Verbal assurances were made that alternatives were readily available, yet no documentation was provided. In fact, there are *no* good alternatives to sodium nitrate, because all other sources contain little or no nitrate and instead rely on the slow decomposition of protein amino acids to nitrate – which will not occur at the cold soil temperatures where sodium nitrate is so effective and essential.
- Technical Reviews: The Committee decisions were made not based on a new and accurate Technical Review, but on a 2002 Technical Review that contains numerous inaccuracies, including many of the points made in this letter. Although the Committee had requested new reviews, they were either not provided prior to the decision or

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considered inadequate by the Crops Committee. If sodium nitrate is delisted by NOP, the NOSB cannot later opt to reconsider this substance in the event a new and adequate Technical Review confirms that it meets all the applicable materials criteria – a new petition process would have to be initiated.

- Public Comments: Organic integrity is built on objective review and transparency to ensure that the organic consumers' expectations are being met and that there is a level playing field for all those engaged in organic production. In the recent NOSB Crops Committee and full Committee deliberations, these doctrines appear not to have been met. Hundreds of comments attested to the importance of continued sodium nitrate use, including comments from agronomic experts in organic production, yet those comments were ignored. Comments were submitted by agricultural experts attesting to the inaccuracies of many of the NOSB technical assumptions about sodium nitrate, yet these documents were ignored.
- NOP's request: The transcripts of the meeting recorded the NOP request that the NOSB disallow sodium nitrate based on international equivalency. This is not a legitimate component of the NOSB's sunset considerations. Sodium nitrate's current use pattern *as annotated* in the regulations should have been considered solely on the merits of the material. This is particularly true since other governments have recognized that international equivalency is an outdated concept and is not anymore reflected in the current organic production and flow of trade. Sodium nitrate should not be used as a poster child for an obsolete and dogmatic concept.

We urge NOP to rethink its support for the NOSB's recommendation on sodium nitrate, undertake an investigation of this matter, and apply good science and clear judgment to the decision of sodium nitrate use in organic agriculture. We appreciate the opportunity to discuss these issues with you.

Sincerely,



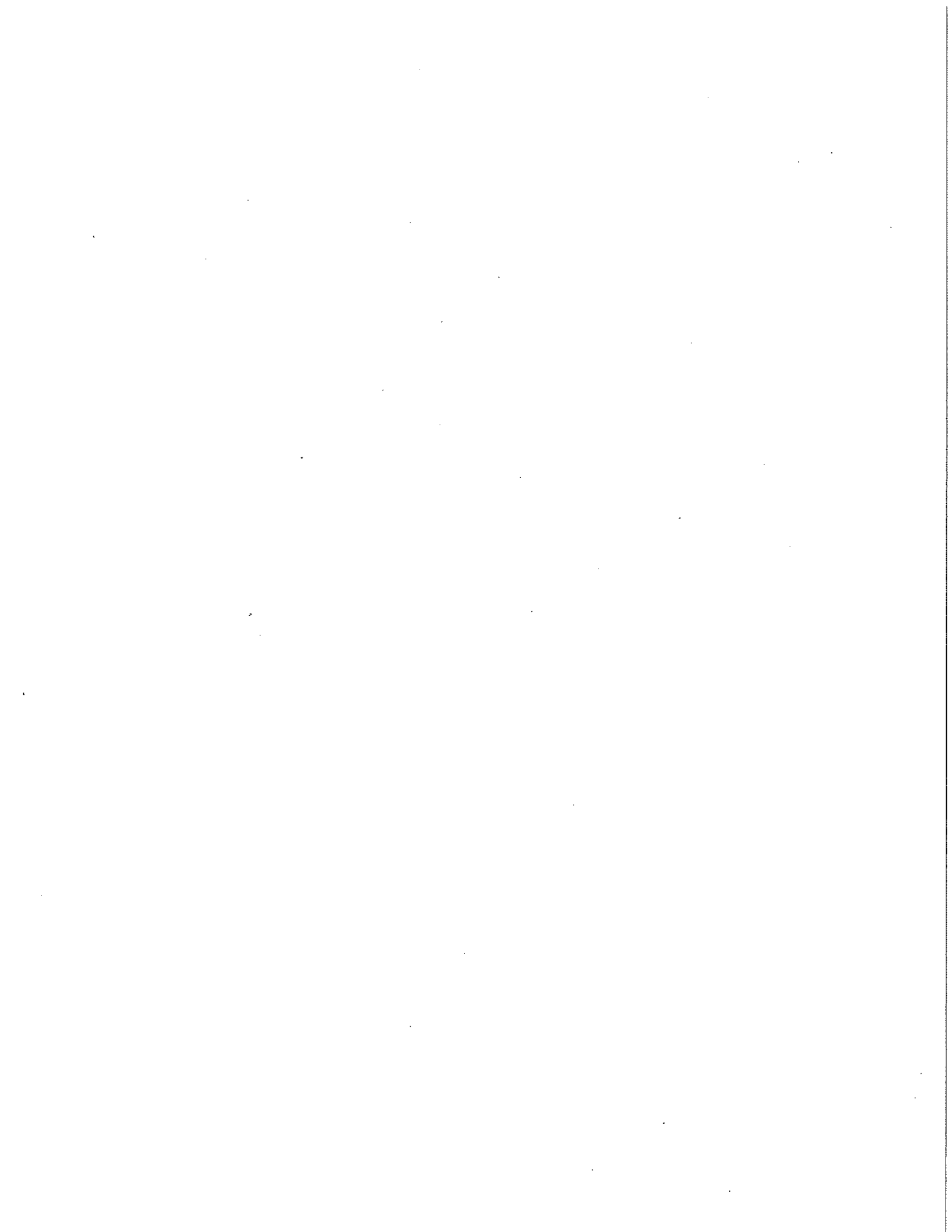
John Thorne, PhD  
Sr. Policy Advisor



Patrick Donnelly, PhD  
Sr. Policy Advisor



Public Comments  
Submitted to the Docket of  
The National Organic Standards Board  
Supporting Continued Use of  
Sodium Nitrate Fertilizer  
April 2011



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167. J. Michael Orchards, Inc. Jeffrey Michael, April 08 1011, WA
168. Wolf DiMatteo + Associates, Katherine DiMatteo, April 10 2011, VA
169. Priebe's Organics, Richard Priebe, April 08 2011, MN
170. Union Point Custom Feed, Alice Royle, April 08 2011, OR
171. Jarchow & Holmstrom Farm, Allen Jarchow, April 08 2011, MN
172. Colby Dairy, Amy Colby, April 08 2011, WI
173. Tradewinds Coffee Co.,Inc, Art Watkins, April 09 2011, NC
174. General Mills Prtns, -Hannibal, Becky Hamilton, April 09 2011,
175. Katie Stoltzfus, Benjamin Stoltzfus, April 08 2011, PA
176. Sundial Orchards, Brad Johl, April 08, 2011, CA
177. Brent and Kay May Farm, Brent May, April 08 2011, OR
178. Brian Bertelt, April 08 2011, IA
179. Bruce Ballard, April 08 2011, ME
180. Bruce & Barbara Rolen, Bruce Rolen, April 08 2011,CA
181. The Village Botanica inc, Carlton Colmenares, April 08 2011, TX
182. Gillaspie Farms, Carol Gillaspie, April 08 2011, IA
183. Circle B Organic Farm, Charles Brucato, April 08 2011,NY
184. Charles Fowler, April 08 2011, CA
185. Lang Farm, Chalers Homan, April 09 2011, PA
186. Bartels Packing, Chris Bartel, April 08 2011, OR
187. Craig Anderson, April 07 2011, WY
188. Corbett Farms, Craig Corbett, April 08 2011, ID
189. Blue Horizon, Daniel McMeen, April 08 2011,WI
190. Darell Hagerty, April 08 2011,WA
191. Parks Farm, Darrell Parks, April 07 2011,KS
192. David Dahnert, April 09 2011, WI
193. Miami Valley Organic Farm, David Hess, April 09 2011,OH
194. River Valley Farm, David King, April 07 2011,VA
195. Datepac, David Nelson, April 09 2011, AZ
196. David Troyer, April 08 2011, OH
197. Walsh Farms, David Walsh, April 07 2011, MN
198. Werlein Farms, Dennis Werlein, April 07 2011, WI
199. Jaworski Farms, Don Jaworski, April 09 2011,WI
200. Don Anna Farm, Donald Anna, April 08 2011,OH
201. D&M Farms, Donald Hunziker, April 07 2011,IL
202. Lavender Hill Farm, Donald Peck, April 09 2011,CT
203. NPO, Nurses Pistachio Orchard, Donna Olson, April 09 2011,
204. Beretta Dairy, Doug Beretta, April 09 2011,CA
205. Zillmer Farm, Douglas Zilmer, April 09 2011,WI
206. Ed Simon, April 08 2011, OR
207. Indian Ridge Farm, Edward Taylor, April 08 2011, GA
208. Catalan Family Farms, Elizabeth Catalan, April 09 2011,CA
209. Palisade Peach Company, Ellen Wilson, April 06 2011,CO
210. Oak Grove Dairy, Elvin Zeiset, April 08 2011, WI

PRO – listing Sodium Nitrate with annotation

211. Yuma Organics, Ernesto Amador, April 09 2011, AZ
212. Valley View Dairy, Eugene Camozzi, April 09 2011, CA
213. Ramshackle Hollow, Faye Smith, April 09 2011, GA
214. Leitz Farms LLC, Fred Leitz, April 07 2011, MI
215. Organic Orchards Inc, Gary Gottschalk, April 08 2011, WA
216. West Star Farm LLC, George Kohn, April 09 2011, WI
217. Stone Hollow Farm, George McNulty, April 08 2011, PA
218. Wright Way Dairy, George Wright, April 08 2011, NY
219. McPherson Orchards, Greg McPherson, April 08 2011, WA
220. Colusa Milling Company, Greg Smith, April 08 2011, CA
221. Edelweiss Dairy, INC., Hans Wolfisberg, April 07 2011, WA
222. Brooks Family Orchard, Harris Brooks, April 08 2011, WA
223. Shaman Chocolates, Helena Powell, April 09 2011, CA
224. Riverview Orchard, Yolo Produc, Hendrik Feenstra, April 13 2011, CA
225. Ivan Yoder, April 09 2011, WI
226. Jack in the green stock, Jack Boatman, April 07 2011, Pahrump
227. Turtle Island, James Devries, April 08 2011, MI
228. James and Julie Larson, James Larson, April 09 2011, IA
229. Wells Farm, Jason Wells, April 08 2011
230. Lakeside Organic, Joe Czajkowski, April 08 2011, MA
231. Goede Acres, LLC, Joel Goede, April 09 2011, WI
232. John Accornero Farm, John Accornero, April 08 2011, WI
233. Cochetopa Land & Cattle, John Baxter, April 07 2011, Saguache
234. D-B Hills, John Debach, April 08 2011, WI
235. T & T Orchards, John Toevs, April 08 2011, WA
236. Plaisance Ranch, Joseph Ginet, April 09 2011, OR
237. Joseph Schultes Farm, Joseph Schultes, April 09 2011, IA
238. Joshua Wolfe, April 09 2011, WI
239. Rustic Ranch, Judith Eness, April 08 2011, La Farge
240. Babler, Inc/Cascade Cheese Co, Keith Babler, April 07 2011, WI
241. Fuller Krapf Farms, Kenneth Krapf, April 09 2011, IL
242. Colorado Mills, LLC, Kevin Swanson, April 09 2011, Lamar
243. W-7 Organic Beef, Kim Rasmussen, April 09 2011, ID
244. Lance Estevez, Lance Estevez, April 07 2011, MD
245. Larry Hendrix, April 07 2011, IL
246. Leonard Brubaker, April 09 2011, WI
247. Leroy Robinson, April 08 2011, ID
248. Lorne Miller, April 08 2011, PA
249. Leelynn Farm, Luke Ahmed, April 08 2011, ME
250. Rhodes Family Farm, Luke Rhodes, April 09 2011, IN
251. Poulsen Farms, Lydia Poulsen, April 08 2011, UT
252. Edelman Farm, Lynn Edelman, April 07 2011, Sabetha
253. Wickmar Dairy, Mark Wickenhauser, April 07 2011, MN
254. Green Lawn Dairy, Marlin Newswanger, April 09 2011, OH
255. Green Acre Farm, Mary Droessler, April 09, WI
256. Maynard Miller, April 09, IA
257. Buster's Grove, Michael Dodge, April 09, CA
258. Top Of Konocti Farms, April 08, CA
259. Generation Tea, Michael Sanft, April 09, NY
260. Stephani Farm, Mike Stephani, April 09, WI
261. Penford Food Ingredients, Mike Wargocki, April 09, CO

**PRO – listing Sodium Nitrate with annotation**

262. Mike & Jean's Berry Farm, Mike Youngquist, April 07, WA
263. Ancient Lake Gardens, Monte Black, April 08, CA
264. Nathan Lane Brewster, Nathan Lane, April 08, TX
265. Arnold Farms, Neil Arnold, April 09, MI
266. Eight Mile Creek Farm, Pamela McSweeney, April 08, NY
267. Boughan Farms, Pat Boughan , April 09, MI
268. Virginia Gold Orchard, Paul Estabrook, April 08, VA
269. Debeccaris Ltd, DB M&CP Frms, Penna Maurice, April 09, CA
270. Ray Yokiell, April 09, MN
271. Coffren's Farm, Raymond Coffren, April 08, ME
272. Homestake Farms LLC, Richard Cuillier, April 08, WA
273. Sweet Farm, Richard DeMaine, April 09, RI
274. Pedersen Farms Inc, Richard Pedersen, April 08, NY
275. West-Pack Industries LLC, Rick Collett, April 07, NV
276. Rita Spencer, April 09, AR
277. Ti Bo Organic Dairy, Robert Berger, April 09, WI
278. Robert Churchill Farms, Robert Churchill, April 07, CA
279. Eberly Poultry Inc, Robert Eberly, April 09, PA
280. Herrin Farm, Robert Herrin, April 08, AL
281. Arrow Dale Farm, Robert Keatley, April 08, WI
282. Robert Klie, April 07, KS
283. Niles Ranch (HCA), Robert Niles, April 08, CA
284. Adirondack Organic Grains, Robert Perry, April 09, NY
285. Robert Zufall, April 08, NY
286. Ford Farm, Roger Ford, April 09, NY
287. Caesar's Pasta Products, Ron Lodato, April 07, NJ
288. Ron Simons, April 08, NY
289. Scott Johnson, April 08, UT
290. Glaser Organic Farms, Stanley Glaser, April 07, FL
291. Knapke Dairy, Steven Knapke, April 08, OH
292. Hayman Homestead, Tate Hayman, April 08, WV
293. McKeown Ranch, Teresa Mc Keown, April 08, CA
294. Thayben Farm Inc, Thayden Farrington, April 08, ME
295. Eltimar Farm, Tim Elliott, April 09, NY
296. Stark Farms, Tim Stark, April 09, CA
297. Hares Valley Growers, Timothy Derstine, April 7, PA
298. T&E Farm, Inc, Timothy Ford, April 09, FL
299. Parker Farms, Timothy Parker, April 09, WI
300. Titus Nolt, April 09, PA
301. Eakle Farms, Tod Patten, April 08, CA
302. Conquest Organic Farms, Todd Brown, April 08, NY
303. TCJ Farm, Tom Schneider, April 08, MN
304. Tom Steinbach, April 09, WI
305. Wee Hoot Orchard Inc, Tye Fleming, April 08, WA
306. Jerry Dell Farm Inc, Vaughn Sherman, April 09, NY



**PRO – listing Sodium Nitrate with annotation**

- 307. Walter Zurakowski, April 09, WI
- 308. Wayne Reinhard, April 08, IN
- 309. Lucky Field Organics, Weston Lant, April 09, MA
- 310. Eel River Produce, William Reynolds, April 09, CA
- 311. Walking Horse Ranch, William Turner, April 09, CA
- 312. Wyatt's Deer Track Farm, William Wyatt, April 08, VA

## PRO – listing Sodium Nitrate with annotation

### 2. Postings

Document Subtype: Comment

Status: Posted

Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time

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Comment Tracking Number: 80c1f6f5

First Name: Blair

Last Name: McHenry

City: Ferndale

Country: United States

State or Province: WA

Organization Name: Dominion Organics

Natural sodium nitrate was reviewed extensively (and I was part of some of those discussions) many years ago when the national organic program was put in place, and it was an approved product then at that review. I haven't seen any reviews that would refute those reviews that allowed it in the first place, so it should stay as originally discussed.

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**PRO – listing Sodium Nitrate with annotation**

Comment Tracking Number: 80c1f7db

First Name: Randy

Last Name: Brewer

City: Hilmar

Country: United States

State or Province: CA

Organization Name: Brewer Randy Lori

Natural sodium nitrate is a natural-occurring product and we should be able to use it.

Document Subtype: Comment

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Comment Tracking Number: 80c1f782

First Name: Gilman

Last Name: Littlefield

City: Winterport

Country: United States

State or Province: ME

Organization Name: Littlefield's Farm

I think natural sodium nitrate is a really handy tool for organic dairy farmers and helps keep the cows healthy.

**PRO – listing Sodium Nitrate with annotation**

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Page Count: 0  
Comment Tracking Number: 80c1f5de  
First Name: Guy  
Last Name: McEndaffer  
City: New Raymer  
Country: United States  
State or Province: CO  
Organization Name: M & M Farms

If we cannot put nitrogen back in the soil, organic production is not sustainable. We need to keep our nitrogen sources. We need to be able to maintain all the natural nitrate. Anything not synthetically made I do agree with, but anything with natural nitrogen or phosphorous levels should be allowed to be used.

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Comment Tracking Number: 80c1f6f8

First Name: John

Last Name: Holscher

City: Hope

Country: United States

State or Province: RI

Organization Name: The Good Earth Organic Gardening Center

Natural sodium nitrate is a good source for nitrogen that's more readily available than other forms that are allowed in the program. We rely on it here on our farm, within the guidelines specified by the NOSB, so I don't see any benefit to removing it from the list.

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Status: Posted

Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time

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Comment Tracking Number: 80c1f634

First Name: William Tate

Last Name: Hayman

City: Leon

Country: United States

**PRO – listing Sodium Nitrate with annotation**

State or Province: WV  
Organization Name: Hayman Homestead

If we don't allow the continued use of natural sodium nitrate, it will hurt those organic farmers out there that rely on that to produce their crops and livestock.

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Comment Tracking Number: 80c1f804

First Name: Harold  
Last Name: Trujillo  
City: Santa Fe  
Country: United States  
State or Province: NM  
Organization Name: Trujillo Ranch

I support the choice to be able to use natural sodium nitrate if it is needed.

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Comment Tracking Number: 80c1f42b  
First Name: Gerald  
Last Name: Rebensdorf  
City: Fresno  
Country: United States  
State or Province: CA  
Organization Name: Schwabenland (Gerald)

It is a natural product. I don't see any reason why we can't use it to farm organically.

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Page Count: 0  
Comment Tracking Number: 80c1f623  
First Name: Patricia  
Last Name: Burke  
City: Ewing  
Country: United States  
State or Province: VA

**PRO – listing Sodium Nitrate with annotation**

Organization Name: Burke Farm

Natural sodium nitrate is necessary and very beneficial to growing things. I don't think it's harmful environmentally; I think it's a natural substance and we should be allowed to use it. When you have so many restrictions, it requires so much extra effort to raise a crop that it's not competitive with a lot of non-organic operations.

Document Subtype: Comment

Status: Posted

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Comment Tracking Number: 80c1f628

First Name: James

Last Name: Haley

City: Pennington Gap

Country: United States

State or Province: VA

Organization Name: Haley & Satterfield Fml Frms

Natural sodium nitrate is a naturally occurring substance that should be allowed in organic food production.

Document Subtype: Comment

Status: Posted

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**PRO – listing Sodium Nitrate with annotation**

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Comment Tracking Number: 80c1fb16

First Name: Marvin

Last Name: Plenis

City: McLaughlin

Country: United States

State or Province: SD

Organization Name: Rainbow Ranch

You can grow better crops with it.

Document Subtype: Comment

Status: Posted

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Comment Tracking Number: 80c1fb3f

First Name: Dale

Last Name: Svacina

City: Lesterville

Country: United States

State or Province: SD

Organization Name: D.S. Organic

## PRO – listing Sodium Nitrate with annotation

You can grow better crops.

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Page Count: 0  
Comment Tracking Number: 80c1f708  
First Name: Walt  
Last Name: Drummond, Jr.  
City: Warwick  
Country: United States  
State or Province: MD  
Organization Name: Wallin Farm, CSA

We can't afford to grow corn now as it is with the nitrogen products we ARE allowed to use; I can't imagine how much more difficult it would be if you took natural sodium nitrate away.

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**PRO – listing Sodium Nitrate with annotation**

Comment Tracking Number: 80c1f62f

First Name: Jim  
Last Name: Hergenreder  
City: Longmont  
Country: United States  
Organization Name: Twin Peaks Seed & Grain

Any product that is nitrogen fertilizer and created in nature should be able to be used in organics because nature created it.

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Comment Tracking Number: 80c1f702

First Name: Dwight  
Last Name: Heser  
City: Vida  
Country: United States  
State or Province: MT  
Organization Name: Heser Farm

NOSB should allow for the continued use of natural sodium nitrate because it's good fertilizer.

Document Subtype: Comment

**PRO – listing Sodium Nitrate with annotation**

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Page Count: 0  
Comment Tracking Number: 80c1f7ac  
First Name: Ralph  
Last Name: Turner  
City: Freeport  
Country: United States  
State or Province: ME  
Organization Name: Laughing Stock Farm

Continued use of natural sodium nitrate should be allowed because we have very few sources available to us, and I don't want to see any of them go away.

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Comment Tracking Number: 80c1faf6  
First Name: Roger

**PRO – listing Sodium Nitrate with annotation**

Last Name: Lewison  
City: Westby  
Country: United States  
State or Province: WI  
Organization Name: Roger Lawson

It's a natural substance.

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Page Count: 0  
Comment Tracking Number: 80c1f771

First Name: Saul  
Last Name: Fortunoff  
City: Vashon  
Country: United States  
State or Province: WA  
Organization Name: Northbest Natural Products

I believe natural sodium nitrate should be used with a 20 percent limit, as exists. It's an invaluable product that is better than all the alternatives. In addition I believe that the 20 percent should be removed for aquaculture users, where it doesn't matter what the salt level is.

Document Subtype: Comment

**PRO – listing Sodium Nitrate with annotation**

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Comment Tracking Number: 80c1f7e9

First Name: John

Last Name: Lagier

City: Escalon

Country: United States

State or Province: CA

Organization Name: Lagier Ranches, Inc.

I think natural sodium nitrate should be allowed because some vegetable row-crop growers need to use it. It reacts differently with different soils. We've never used it, but some people need it.

Document Subtype: Comment

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Comment Tracking Number: 80c1f70b

First Name: Terry

**PRO – listing Sodium Nitrate with annotation**

Last Name: Weihl  
City: Perrysburg  
Country: United States  
State or Province: OH  
Organization Name: Weihl Farms

There's no other natural product out there on the market that can have as much nitrogen available to the plant as natural sodium nitrate. I use it for good, first-quality grain.

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Comment Tracking Number: 80c1f817

First Name: Mark  
Last Name: Simon  
City: New Prague  
Country: United States  
State or Province: MN  
Organization Name: Meadows Pride Farm

We've been using natural sodium nitrate for years. I don't see why all of the sudden it shouldn't be able to be used.

Document Subtype: Comment

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Page Count: 0  
Comment Tracking Number: 80c1f811  
First Name: Chris  
Last Name: Lutteke  
City: Wells  
Country: United States  
State or Province: MN  
Organization Name: Lutteke Organic

Natural sodium nitrate should be allowed to be used.

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Comment Tracking Number: 80c1f8e8  
First Name: Howard  
Last Name: Koozer



**PRO – listing Sodium Nitrate with annotation**

City: Sedro Woolley  
Country: United States  
State or Province: WA  
Organization Name: Day Creek Organic Farms, Inc.

It's been our understanding that natural products are to be approved.

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Page Count: 0  
Comment Tracking Number: 80c1fb03  
First Name: Roger  
Last Name: Hill  
City: Honesdale  
Country: United States  
State or Province: PA  
Organization Name: Varcho Veda

Natural Sodium Nitrate isn't harmful to the soil.

Document Subtype: Comment  
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Page Count: 0  
Comment Tracking Number: 80c1f705  
First Name: Moses  
Last Name: Ibarra  
City: Reedley  
Country: United States  
State or Province: CA  
Organization Name: J & M Ibarra Organic Farms

Natural sodium nitrate is a valuable tool to have and it's ok to use it once in a while. Sometimes you have no choice and you have to have some kind of a source of nitrate.

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Page Count: 0  
Comment Tracking Number: 80c1f763  
First Name: Tracey  
Last Name: Hollingsworth  
City: Oneonta

**PRO – listing Sodium Nitrate with annotation**

Country: United.States  
State or Province: AL  
Organization Name: Double O Farms

Natural sodium nitrate is all-natural. Instead of harming the ground it has a backwards effect on it, which is really good. It's an outstanding product.

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Comment Tracking Number: 80c1fb11

First Name: David  
Last Name: Parr  
City: La Farge  
Country: United States  
State or Province: WI  
Organization Name: Elysian View Farm

They're an important part of the organic farming practices.

Document Subtype: Comment  
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Comment Tracking Number: 80c1f7d4  
First Name: Thomas  
Last Name: Arlan  
City: Le Grand  
Country: United States  
State or Province: CA  
Organization Name: Thomas & Thomas

Natural sodium nitrate is a mined product; it's not a manufactured product like the ammonia fertilizers.

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Status: Posted  
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Comment Tracking Number: 80c1f61d  
First Name: John  
Last Name: Van Voorhees  
City: Fennville  
Country: United States  
Organization Name: Pleasant Hill Farm

**PRO – listing Sodium Nitrate with annotation**

As long as natural sodium nitrate is regulated, it's a natural product and organic growers should be allowed to use the product.

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Page Count: 0  
Comment Tracking Number: 80c1f608  
First Name: George  
Last Name: McManus  
City: Benton Harbor  
Country: United States  
Organization Name: LH Piggott & Girls Farm

I don't see any problem with using a natural product for organic production.

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Comment Tracking Number: 80c1fb15

**PRO – listing Sodium Nitrate with annotation**

First Name: Ted  
Last Name: Weis  
City: West Union  
Country: United States  
State or Province: IA  
Organization Name: Cow Crazy Dairy

We should continue to use it because the organic stuff is getting too expensive. T

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Comment Tracking Number: 80c1f5f8

First Name: Ron  
Last Name: Buckholtz  
City: Scottville  
Country: United States  
State or Province: MI  
Organization Name: Creative Co-Packing Solutions

I feel sodium nitrate is not harmful to the environment, and it's a good thing that farmers should be able to use.

Document Subtype: Comment

**PRO – listing Sodium Nitrate with annotation**

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Page Count: 0  
Comment Tracking Number: 80c1f829  
First Name: John  
Last Name: Danckwart  
City: Kellogg  
Country: United States  
State or Province: MN  
Organization Name: Danckwart Feed & Grain

Natural sodium nitrate is an asset to the farming operation.

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Page Count: 0  
Comment Tracking Number: 80c1f431  
First Name: Jerry  
Last Name: Homolka

**PRO – listing Sodium Nitrate with annotation**

City: Madera  
Country: United States  
State or Province: CA  
Organization Name: Golden Valley Grap JC & WN LLC

It is a natural product. It should be allowed in farming. It is not a synthetic product.

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Page Count: 0  
Comment Tracking Number: 80c1f816  
First Name: Wayne  
Last Name: Schwartz  
City: Le Sueur  
Country: United States  
State or Province: MN  
Organization Name: Wayne Schwartz

As an organic farmer, I have used natural sodium nitrate. As long as it is a mined, pure product, it's got its place and we should keep using it.

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Comment Tracking Number: 80c1f5ff  
First Name: Scott  
Last Name: Winslow  
City: Belvidere  
Country: United States  
State or Province: NC  
Organization Name: Winslow Bros. Farms

I believe they should allow the use because there are few things available for nitrogen in an organic crop. There are a lot of crops that need that extra nitrogen, and other resources are kind of scarce, so we should be able to keep it.

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Comment Tracking Number: 80c1f7ad  
First Name: Steve  
Last Name: Miller  
City: Fairfield

**PRO – listing Sodium Nitrate with annotation**

Country: United States  
State or Province: ID  
Organization Name: Wolf Springs Ranch

I think the application of natural products (natural sodium nitrate) fits within the organic philosophy that we've lived by for many many years.

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Comment Tracking Number: 80c1f806

First Name: Ronald  
Last Name: Ice  
City: Alcalde  
Country: United States  
State or Province: NM  
Organization Name: Ice's Organic Farm

The proposal to ban natural sodium nitrate is based on a belief and not anything scientifically-based.

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Comment Tracking Number: 80c1f6de  
First Name: James  
Last Name: Austin  
City: Oakville  
Country: United States  
State or Province: WA  
Organization Name: Washington Farm

As long as it's organic, we should be able to use natural sodium nitrate.

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Page Count: 0  
Comment Tracking Number: 80c1f6f2  
First Name: Tom  
Last Name: Wencil  
City: Blooming Prairie  
Country: United States  
State or Province: MN

**PRO – listing Sodium Nitrate with annotation**

Organization Name: Tom Wencil

Chilean is important for early crop development when temps are cool. Chilean nitrate also is helpful for residue breakdown to allow nutrients, both crop and manure, to become usable for the current crop. In both applications a low rate is beneficial saving an larger application of a less available source.

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Comment Tracking Number: 80c1f80f

First Name: David

Last Name: Kallemeyn

City: Holland

Country: United States

State or Province: MN

Organization Name: Hi Fat Specialties

I didn't know about natural sodium nitrate before, but it would be nice for farmers if they get a dry spell in the summer and their clover didn't come (which we need for our milk cows). It would also be nice if they could have nitrate to grow their corn.

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Comment Tracking Number: 80c1f7a6

First Name: Daniel

Last Name: Vanwart

City: Dedham

Country: United States

State or Province: ME

Organization Name: Peaked Mountain Farm

I feel natural sodium nitrate is a natural product that has been approved for organic use in the past, and should still should be able to be used.

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Comment Tracking Number: 80c1f827

First Name: Paul

Last Name: Mattison

City: Lamberton

Country: United States

State or Province: MN

**PRO – listing Sodium Nitrate with annotation**

Organization Name: Mattison Farm

I believe they should allow the use of natural sodium nitrate partly because it's natural, and also it's effective in a positive way. I don't feel there's enough negative effects to not allow it.

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Comment Tracking Number: 80c1f5f2

First Name: Dean

Last Name: Hamlin

City: Warroad

Country: United States

State or Province: MN

Organization Name: Hamlin Farms

Sodium nitrate is a very fine product for soil application. It is a naturally mined product, and we have ways of taking care of what some people might consider an excess sodium situation with calcium.

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Comment Tracking Number: 80c1f7cc

First Name: Rich

Last Name: Curtis

City: Gooding

Country: United States

State or Province: ID

Organization Name: Davenport Farms, Inc

Organic farmers need as many natural tools as they can get in their production of organic agriculture commodities (i.e. natural sodium nitrate), and I would hate to see the NOSB limit one more and make it tougher on them.

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Comment Tracking Number: 80c1f602

First Name: Wayne

Last Name: Reinhard

City: Bluffton

Country: United States

Organization Name: Wayne Reinhard

**PRO – listing Sodium Nitrate with annotation**

We are already very limited on nitrogen sources, and natural sodium nitrate seems to work very well for a nitrogen source.

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Comment Tracking Number: 80c1f6da  
First Name: David  
Last Name: Miller, Jr.  
City: Sugar Creek  
Country: United States  
State or Province: OH  
Organization Name: Mill-Ron Farm

I think common sense goes a long way in preserving our liberty here and our means of providing food, and I see no reason why natural sodium nitrate could not be used and still be labeled as organic.

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Comment Tracking Number: 80c20471

First Name: Chris  
Last Name: Malek  
City: Stevens Point  
Country: United States  
State or Province: WI  
Organization Name: Malek Farms, Inc

If we can use other mine fertilizers, I don't understand why we can't use this one.

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Comment Tracking Number: 80c21041

First Name: Bill  
Last Name: McBride  
City: Skipwith  
Country: United States  
State or Province: VA  
Organization Name: McBride Brothers Farm

Mr. Smith's comment reinforces our idea that organic beef production will be very difficult without a sodium nitrate, he knows the need for readily available nitrogen in grass production during the cool seasons when nitrification is either very slow or non existent

**PRO – listing Sodium Nitrate with annotation**

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Comment Tracking Number: 80c204a0  
First Name: David  
Last Name: Schoonmaker  
City: Clyde  
Country: United States  
State or Province: NY  
Organization Name: Schoonmaker's Acre's

In a blend of fertilizers, you get much better greens (with produce mostly). It can greatly improve your crop yield.

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Comment Tracking Number: 80c20496

**PRO – listing Sodium Nitrate with annotation**

First Name: Leonard  
Last Name: Brubaker  
City: Withee  
Country: United States  
State or Province: WI  
Organization Name: Leonard Brubaker

It's a good nitrogen source.

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Page Count: 0  
Comment Tracking Number: 80c20508

First Name: Mary  
Last Name: Delmege  
City: Escondido  
Country: United States  
State or Province: CA  
Organization Name: Black Cat Farm

Is valuable and an inexpensive tool to add nitrogen to the soil.

PRO - listing Sodium Nitrate with annotation

First Name: Leonard

Last Name: Brubaker

City: Withee

Country: United States

State or Province: WI

Organization Name: Leonard Brubaker

It's a good nitrogen source.

Document Subtype: Comment

Status: Posted

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Comment Tracking Number: 80c20508

First Name: Mary

Last Name: Delmege

City: Escondido

Country: United States

State or Province: CA

Organization Name: Black Cat Farm

is valuable and an inexpensive tool to add nitrogen to the soil.

**PRO – listing Sodium Nitrate with annotation**

Last Name: Miller  
City: Bath  
Country: United States  
State or Province: NY  
Organization Name: Peace Weaver Organic Community Farm

Natural sodium nitrate is a naturally occurring material

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Comment Tracking Number: 80c20502

First Name: Robert  
Last Name: Omlor  
City: Darlington  
Country: United States  
State or Province: PA  
Organization Name: Honeydale Farm

I believe sodium nitrate should be used mostly as a mix with some compost because it can be very expensive to try and get enough nitrogen into the compost without using it.

**PRO – listing Sodium Nitrate with annotation**

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Page Count: 0  
Comment Tracking Number: 80c2103c  
First Name: Bill  
Last Name: McBride  
City: Skipwith  
Country: United States  
State or Province: VA  
Organization Name: McBride Brothers Farm

I support the use of natural sodium nitrate in organic production. Living in Virginia we have cool springs and a nitrate nitrogen source even though it is limited to 20% of total nitrogen would be beneficial to organic wheat production and to pasture land. We are to produce organic crops, our tobacco is exported to Europe and sodium nitrate is not allowed, however, we are growing organic wheat and would like to produce organic beef but do not believe there is a readily available source of nitrogen for our crops in early spring late winter without the availability of sodium nitrate. We have not used any sodium nitrate but feel that the option to use this natural nitrogen product should not be taken away from the American Farmer. I would urge you to let the grower use this product if the grower wants to use it because of its many agronomic benefits.

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Page Count: 0  
Comment Tracking Number: 80c202f2  
First Name: Mick  
Last Name: Kodner  
City: Port Royal  
Country: United States  
State or Province: PA  
Organization Name: Dancing Creek Farm

Natural sodium nitrate is an important tool that organic farmers use for the life of their crops.

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Comment Tracking Number: 80c204b0  
First Name: Robert  
Last Name: Johanson  
City: Dresden  
Country: United States  
State or Province: ME  
Organization Name: Goranson Farm

**PRO – listing Sodium Nitrate with annotation**

If used in a conservative manner in natural disaster situations (like long, heavy rains), it can replace any nitrogen lost and help avoid crop failure.

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Comment Tracking Number: 80c2047d  
First Name: Dwight  
Last Name: Martin  
City: Moravia  
Country: United States  
State or Province: NY  
Organization Name: Queenholm Holsteins

I don't want the options limited for farmers to use as a fertilizer source.

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Page Count: 0  
Comment Tracking Number: 80c205a0  
First Name: Robert  
Last Name: Lindsey  
City: Vero Beach  
Country: United States  
Organization Name: Lindsey Citrus Management

If you aren't able to use nitrate the only alternative in my case is to get out of organic program.

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Page Count: 0  
Comment Tracking Number: 80c2096b  
First Name: Stan  
Last Name: Vander Kooi  
City: Buffalo  
Country: United States  
State or Province: MN  
Organization Name: Stan Vander Kooi

To whom it may concern. Chilean nitrate is used in an overall farm management plan and will be used in early season growing crops or as needed in crops that need some additional N. during the growing season. We always say that growing organic crops can be done in such a way that we can help feed

**PRO – listing Sodium Nitrate with annotation**

the world so don't take away a tool in the tool box that can help us do that. I believe there are reasonable rules already in place that allow the sound use of chilean nitrate.

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Comment Tracking Number: 80c2030c  
First Name: Robert  
Last Name: Knight  
City: Vero Beach  
Country: United States  
State or Province: FL  
Organization Name: Robert L. Knight

Natural sodium nitrate is natural.

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**PRO – listing Sodium Nitrate with annotation**

Comment Tracking Number: 80c2047b

First Name: John  
Last Name: Stoltzfus  
City: Parkesburg  
Country: United States  
State or Province: PA  
Organization Name: John Stoltzfus

Its the source for nitrogen on corn and grass.

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Comment Tracking Number: 80c20b8f

First Name: Lindsley  
Last Name: Evans  
City: Phoenix  
Country: United States  
State or Province: AZ  
Organization Name: Rousseau Farming

I am writing to strongly encourage the NOSB to maintain the limited availability of sodium nitrate for use in organic farming systems as it is an invaluable tool vital to my success as an organic producer. Sodium nitrate is an already mineralized form of high quality nitrogen that is immediately available to the plant and used in my operation as a supplemental source of nitrogen that is essential to the quality

**PRO – listing Sodium Nitrate with annotation**

and marketability of my products. I use this material in conjunction with compost, cover crops, and other soil building strategies to ensure a balanced organic system as well as the highest quality crops available for my customers. Sodium nitrate is of critical importance to me during the winter season when soil temperatures are cool and it is difficult to provide sufficient nitrate to the plant from any other source. Please act to maintain the current language in Section 205.602 by listing sodium nitrate with the annotation that allows for its use to meet up to 20% of the crops total requirements for N.

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Comment Tracking Number: 80c2030f  
First Name: Robert  
Last Name: Lindsey  
City: Vero Beach  
Country: United States  
State or Province: FL  
Organization Name: Lindsey Citrus Management

If we are not allowed to do that little bit of application with Chilean nitrate, the only alternative is to get out of the organic program.

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Comment Tracking Number: 80c2046f

First Name: Mary

Last Name: Eldredge

City: Vacaville

Country: United States

State or Province: CA

Organization Name: Vaca Valley Orchard Company

I have been an organic farmer since 1992, and supplying nitrogen organically is very difficult, especially with certain crops. I think this is reasonable and safe, and the alternatives are too expensive at this time.

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Comment Tracking Number: 80c20307

First Name: Mary

Last Name: Delmege

City: Escondido

Country: United States

Organization Name: Black Cat Farm

**PRO – listing Sodium Nitrate with annotation**

I think it's a valuable and relatively inexpensive tool for adding nitrogen to the soil.

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Page Count: 0  
Comment Tracking Number: 80c204bd  
First Name: Edward  
Last Name: Kleinwort  
City: Saint Ansgar  
Country: United States  
State or Province: IA  
Organization Name: St. Ansgar Mills, Inc.

There isn't another good way to get enough nitrogen to have crop yields that make it sustainable to stay organic. With prices going up, it's going to be tough to have organic farmers at all.

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**PRO – listing Sodium Nitrate with annotation**

Comment Tracking Number: 80c1ef1f

First Name: Raymond

Last Name: Nelson

City: Rochester

Country: United States

State or Province: MN

Organization Name: Your Prairie Son Organic Farm

If you can use it now you should be able to keep using it.

Document Subtype: Comment

Status: Posted

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Page Count: 0

Comment Tracking Number: 80c20303

First Name: Robert

Last Name: Omlor

City: Darlington

Country: United States

State or Province: PA

Organization Name: Honeydale Farm

I believe that sodium nitrate should be allowed to be used mostly as a mix with another compost, because it can be very expensive to try to get enough nitrogen into some of the compost without using it.

**PRO – listing Sodium Nitrate with annotation**

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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
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Page Count: 0  
Comment Tracking Number: 80c1ee8a  
First Name: James  
Last Name: Falb  
City: Dalton  
Country: United States  
State or Province: OH  
Organization Name: RJ Dairy

We have found it necessary to use sodium nitrate for packing purposes. We don't use it a lot, but like having the option of being able to use if we need it.

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Comment Tracking Number: 80c1f5d1



**PRO – listing Sodium Nitrate with annotation**

First Name: James  
Last Name: Hoffman  
City: Edinburg  
Country: United States  
State or Province: TX  
Organization Name: Sustainable Agronomic DCTN SSCTN

I do believe in using organic sources of compost, but there are certain times (especially in citrus farming) in a crop cycle that you need a solid dose of nitrogen at bloom time in order to get the fruit sized up. This is when I prefer to use the sodium nitrate product.

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Page Count: 0  
Comment Tracking Number: 80c1f5c3

First Name: Sheryl  
Last Name: Kunkle  
City: Temecula  
Country: United States  
State or Province: CA  
Organization Name: Sheryl Kunkle

I do not believe that natural sodium nitrate has proven to be a problem for organic farming.

**PRO – listing Sodium Nitrate with annotation**

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Page Count: 0  
Comment Tracking Number: 80c1ef1e  
First Name: Douglas  
Last Name: Gunnink  
City: Gaylord  
Country: United States  
State or Province: MN  
Organization Name: Dutch Mill

Sodium nitrate has been very useful. It has been a supplement for dry periods for some of our pastures and has helped keep high quality grass for our beef and dairy cattle.

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Comment Tracking Number: 80c200db

**PRO – listing Sodium Nitrate with annotation**

First Name: James  
Last Name: Johnston  
City: Venus  
Country: United States  
State or Province: FL  
Organization Name: J & J Organics

Nitrogen Sodium in my opinion is a valuable source that is needed.

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Comment Tracking Number: 80c1f0c5

First Name: Jerry  
Last Name: Glaser  
City: Spalding  
Country: United States  
State or Province: NE  
Organization Name: Jerry Glaser

In our climate, we use early application of Chilean Nitrate to get the crops off to a good start to produce a nutrient-dense food product. There are very limited resources to replace it. In the organic world, as producers, we want to be held to a higher standard, however this is no place for politics. The goal is to produce high quality food and improve the soils.

**PRO – listing Sodium Nitrate with annotation**

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Page Count: 0  
Comment Tracking Number: 80c1f0ee  
First Name: Bob  
Last Name: Pasanen  
City: Winter  
Country: United States  
State or Province: WI  
Organization Name: Bpb Pasanen

We need the Chilean nitrate for our early season crops to supply nitrogen.

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Comment Tracking Number: 80c200ec  
First Name: Mick

**PRO – listing Sodium Nitrate with annotation**

Last Name: Kodner  
City: Port Royal  
Country: United States  
State or Province: PA  
Organization Name: Dancing Creek Farm

Natural sodium nitrate is an important tool that organic farmers use to fertilize their crops

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Comment Tracking Number: 80c1febd

First Name: Julie  
Last Name: Sizemore  
City: Fletcher  
Country: United States  
State or Province: NC  
Organization Name: Cane Creek Valley Farms

It is a valuable tool as an organic farmer to be able to get nutrients in our crops while we needed. It also has a higher nitrogen which makes it very valuable.

**PRO – listing Sodium Nitrate with annotation**

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Comment Tracking Number: 80c1f3a0  
First Name: Philip  
Last Name: Henden  
City: Viroqua  
Country: United States  
State or Province: WI  
Organization Name: L-Cove Farms

Nitrogen is natural, and if it's all-natural, it should be a good use.

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Comment Tracking Number: 80c20078  
First Name: Alan

**PRO – listing Sodium Nitrate with annotation**

Last Name: Freeman  
City: Lubbock  
Country: United States  
State or Province: TX  
Organization Name: Alan Freeman Farms

Crops need a source of nitrogen otherwise the production doesn't meet what it takes to stay profitable

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Comment Tracking Number: 80c20091

First Name: Jay  
Last Name: McCaman  
City: Sand Lake  
Country: United States  
State or Province: MI  
Organization Name: Jay McCaman

As a consultant I see the need for Chilean nitrate as most of the soil samples that cross my desk report less than half of the desired 20 ppm of sodium. Celery and asparagus appear to need more.

**PRO – listing Sodium Nitrate with annotation**

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Page Count: 0  
Comment Tracking Number: 80c1f3d1  
First Name: Jon  
Last Name: Carlson  
City: Thornton  
Country: United States  
State or Province: IA  
Organization Name: Jon Carlson

For my organic farms it is beneficial to the production of my crops. Sodium nitrate helps produce corn and soybeans that will feed more people.

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Comment Tracking Number: 80c1fe11



**PRO – listing Sodium Nitrate with annotation**

First Name: Larry  
Last Name: Lewis  
City: Penn Yann  
Country: United States  
State or Province: NY  
Organization Name: Lewis Farms

Because it is a naturally mined product. As long as it is not been altered I don't see any issues with it. It is a already set up so that you can only use 20% in your total nitrogen needs so that should protect anything from being over used.

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Page Count: 0  
Comment Tracking Number: 80c20412

First Name: Gary  
Last Name: Lambert  
City: Cairnbrook  
Country: United States  
State or Province: PA  
Organization Name: Lambert Mountain Acres, Inc.

Chilean nitrate is a natural substance, and we should be able to use it.

**PRO – listing Sodium Nitrate with annotation**

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Comment Tracking Number: 80c1ee01  
First Name: Dean  
Last Name: Berden  
City: Snover  
Country: United States  
State or Province: MI  
Organization Name: Dean Berden

I've been certified organic since 1988. Sodium Nitrate is not a chemical product. If we take that away we are going to get a lot of farmers who are using organic materials to stop doing that.

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**PRO – listing Sodium Nitrate with annotation**

First Name: Edwin  
Last Name: Martin  
City: Penn Yan  
Country: United States  
State or Province: NY  
Organization Name: Wishing Well Farm

It is our only nitrogen source at this time except for animal manure. If they are going to ban anything they should ban chicken manure.

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Comment Tracking Number: 80c1fd4d

First Name: Ralph  
Middle Name: Neil  
Last Name: Iliff  
City: Gonzales  
Country: United States  
State or Province: CA  
Organization Name: Converted Organics.com

Nitrate of Soda is a very controlled and use limited to need. Our product has 5% organic nitrogen with only 2% of it from nitrate so only 2% sodium which is less than condensed mollasses has in it with a

**PRO – listing Sodium Nitrate with annotation**

total of 3% nitrogen. If NaNO<sub>3</sub> is decertified because someone uses it in the wrong way because of the sodium, than all sodium containing materials must also be controlled. Hello manure and mollasses!

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Page Count: 0  
Comment Tracking Number: 80c20699  
First Name: Gail  
Middle Name: Ann  
Last Name: Talbot  
City: Huntley  
Country: United States  
State or Province: IL  
Organization Name: Citizen  
Government Agency Type: Federal

Sodium Nitrate. I support the Crops Committee recommendation "1. Relist sodium nitrate § 205.602(g) without annotation" on sodium nitrate, also known as Chilean nitrate, which is used as a soluble nitrate fertilizer.

**PRO – listing Sodium Nitrate with annotation**

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Comment Tracking Number: 80c1f8c0  
First Name: Brooke  
Last Name: Kliewer  
City: Klamath Falls  
Country: United States  
State or Province: OR  
Organization Name: Ty & Brooke Kliewer

I believe that natural sodium nitrate should be allowed in organic farming because they are limited in the uses that they have to fertilize organic ground.

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Comment Tracking Number: 80c20347

**PRO – listing Sodium Nitrate with annotation**

First Name: Lowell  
Last Name: Volkert  
City: New Richmond  
Country: United States  
State or Province: WI  
Organization Name: Volkert Farm

It would be an added benefit for extra crop yield if you don't have enough nitrogen.

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Comment Tracking Number: 80c20353

First Name: Ivan  
Last Name: Brubacher  
City: Narvon  
Country: United States  
State or Province: PA  
Organization Name: Ivan Brubacher

If we need nitrogen, we need to use something. If it's in the natural state, then I wouldn't know why it couldn't be used.

**PRO – listing Sodium Nitrate with annotation**

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Page Count: 0  
Comment Tracking Number: 80c203e9  
First Name: John  
Last Name: Pounder  
City: Delavan  
Country: United States  
State or Province: WI  
Organization Name: Pounder Brothers, Inc. Farm

These are naturally occurring compounds, and if you eliminate the source of nitrogen, it starts to impede the production process and reduces the chance of a successful production. Farmers do need this option available if we don't have other sources of these nutrients.

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Comment Tracking Number: 80c1f8b8

**PRO – listing Sodium Nitrate with annotation**

First Name: Ronald  
Last Name: Heath  
City: Orland  
Country: United States  
State or Province: CA  
Organization Name: Heath Ranch

I think natural sodium nitrate is a good tool to work with.

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Comment Tracking Number: 80c1fe38

First Name: Robert  
Last Name: Henneman  
City: Evansville  
Country: United States  
State or Province: MN  
Organization Name: Henneman Family Farm

Because other sources of nitrogen are very limited.



**PRO – listing Sodium Nitrate with annotation**

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Page Count: 0  
Comment Tracking Number: 80c203f6  
First Name: Barbara  
Last Name: Lauchland  
City: Acampo  
Country: United States  
State or Province: CA  
Organization Name: Lauchland, Barbara

I believe sodium nitrate should be used by organic farmers because it is a valuable and safe tool in growing crops.

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Comment Tracking Number: 80c1f8cf

**PRO – listing Sodium Nitrate with annotation**

First Name: Leon  
Last Name: Brubacher  
City: Himrod  
Country: United States  
State or Province: NY  
Organization Name: Leon Brubacher

The reason I believe that (natural sodium nitrate should be allowed) is because if it's an important ingredient that we need, then I want to use it, too.

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Comment Tracking Number: 80c1f88e

First Name: George  
Last Name: Jelmborg  
City: Royal City  
Country: United States  
State or Province: WA  
Organization Name: Jelmborg Farms

Natural sodium nitrate is a natural organic product and should be allowed as the complete fertilizer package. The more options growers have, the better product they can produce.

**PRO – listing Sodium Nitrate with annotation**

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Page Count: 0  
Comment Tracking Number: 80c1fd59  
First Name: Tom  
Last Name: Igl  
City: Antigo  
Country: United States  
State or Province: WI  
Organization Name: IGL Farms

It is a great tool for organic farmers because their is limited access to nitrate sources.

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Page Count: 0  
Comment Tracking Number: 80c1fe11  
First Name: Larry

**PRO -- listing Sodium Nitrate with annotation**

Last Name: Lewis  
City: Penn Yann  
Country: United States  
State or Province: NY  
Organization Name: Lewis Farms

Because it is a naturally mined product. As long as it is not been altered I don't see any issues with it. It is a already set up so that you can only use 20% in your total nitrogen needs so that should protect anything from being over used.

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Comment Tracking Number: 80c203dd

First Name: Larry  
Last Name: Weaver  
City: Roy  
Country: United States  
State or Province: WA  
Organization Name: Wilcox Farms, Inc

I think they should allow the natural use of sodium nitrate.

Document Subtype: Comment

**PRO – listing Sodium Nitrate with annotation**

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Page Count: 0  
Comment Tracking Number: 80c1f8bd  
First Name: James  
Last Name: Wenger  
City: Staunton  
Country: United States  
State or Province: VA  
Organization Name: Sunny Slope Farm

Natural sodium nitrate is a product that's good to use, and I think it should be allowed.

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Comment Tracking Number: 80c1edff  
First Name: Larry  
Last Name: Hendrix

**PRO – listing Sodium Nitrate with annotation**

City: Buckingham  
Country: United States  
State or Province: IL  
Organization Name: Larry Hendrix

I believe the NOSB should provided continued use of Sodium Nitrate. It is a natural product necessary for production.

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Comment Tracking Number: 80c1eb1d  
First Name: Raymond  
Last Name: Boughton  
City: Colfax  
Country: United States  
State or Province: WI  
Organization Name: Lakeland Farms

We need Sodium Nitrate. It is something we've fought for for years and we do need it. If we keep limiting everything it is going to put the organic farmer out of business.

Document Subtype: Comment  
Status: Posted

**PRO – listing Sodium Nitrate with annotation**

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Page Count: 0  
Comment Tracking Number: 80c1f8ce  
First Name: Jay  
Last Name: Jones  
City: Trail City  
Country: United States  
State or Province: SD  
Organization Name: Hand Boy Creek Ranch

We need something like natural sodium nitrate. I don't think that it's harmful.

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Comment Tracking Number: 80c2034e  
First Name: Norbert  
Last Name: Hiess  
City: Custer

## PRO – listing Sodium Nitrate with annotation

Country: United States

Organization Name: Norbert Hiess Farm

It is absolutely imperative to use Chilean nitrate with the organic combination of things that we use. It's very beneficial and affects the bottom line; if we can't use it it will affect profits, and we'll have to substitute something else that doesn't work as well.

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Comment Tracking Number: 80c1f838

First Name: Don

Last Name: Weippert

City: Wakima

Country: United States

State or Province: WA

Organization Name: Weippert Orchards

Natural sodium nitrate is a valuable tool in the production of organic crops.

Document Subtype: Comment

Status: Posted



**PRO – listing Sodium Nitrate with annotation**

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Page Count: 0  
Comment Tracking Number: 80c1eeb3  
First Name: Rick  
Last Name: Boyer  
City: Oakville  
Country: United States  
State or Province: WA  
Organization Name: Rick and Donna Boyer

It is naturally occurring, a natural product, and it's organic

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Page Count: 0  
Comment Tracking Number: 80c203e3  
First Name: Jesus  
Last Name: Lozano  
City: Pharr

**PRO – listing Sodium Nitrate with annotation**

Country: United States  
State or Province: TX  
Organization Name: Triple J Organics

It helps to get more nitrate into the soil.

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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
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Page Count: 0  
Comment Tracking Number: 80c1eb1c  
First Name: Travis  
Last Name: Sholler  
City: Volant  
Country: United States  
State or Province: PA  
Organization Name: Sholler Farm

We need Natural Sodium Nitrate for self-sustaining crops.

Document Subtype: Comment  
Status: Posted

**PRO – listing Sodium Nitrate with annotation**

Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f8b0  
First Name: James  
Last Name: Rickert  
City: Fall River Mills  
Country: United States  
State or Province: CA  
Organization Name: Ralphs Ranches NC/DB Prather Ranch

Natural sodium nitrate would give you a little bit more flexibility on the products that you use on your fields. We have a hard time getting decent nitrogen sources.

Document Subtype: Comment  
Status: Posted  
Received Date: April 07 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1ee7b  
First Name: Leslie  
Last Name: Miller

**PRO – listing Sodium Nitrate with annotation**

City: Richfld spgs  
Country: United States  
State or Province: NY  
Organization Name: Miller Brothers Farm

I believe sodium nitrate should be allowed because it is a natural substance that has not been altered and should be used in its natural form.

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c20412  
First Name: Gary  
Last Name: Lambert  
City: Cairnbrook  
Country: United States  
State or Province: PA  
Organization Name: Lambert Mountain Acres, Inc.

Chilean nitrate is a natural substance, and we should be able to use it.

Document Subtype: Comment

**PRO – listing Sodium Nitrate with annotation**

Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f8b3  
First Name: William  
Last Name: Lavell  
City: Gridley  
Country: United States  
State or Province: CA  
Organization Name: B Bar L Organic Kiwis

I think natural sodium nitrate is a very valuable tool for some people, and some people need it , so I think they ought to be able to use it.

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
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Page Count: 0  
Comment Tracking Number: 80c1f8ae  
First Name: Christopher

**PRO – listing Sodium Nitrate with annotation**

Last Name: Lincoln  
City: Greenwich  
Country: United States  
State or Province: NY  
Organization Name: New Minglewood Farm

Natural sodium nitrate is a useful soil amendment that is naturally occurring and has benefits in organic farming that other organic fertilizers don't really have. It has very little detrimental effect on the soil.

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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1ee79

First Name: David  
Last Name: Stern  
City: Rose  
Country: United States  
State or Province: NY  
Organization Name: Rose Valley Farm

I think under certain conditions that it is helpful for farmers in New York state where there are particularly cool soils in the fall which makes it difficult for organic nitrogen to be produced. Under limited conditions I support the use of sodium nitrate.

Document Subtype: Comment

**PRO – listing Sodium Nitrate with annotation**

Status: Posted

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Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time

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Page Count: 0

Comment Tracking Number: 80c1f8a0

First Name: Craig

Last Name: O'Brien

City: Prosser

Country: United States

State or Province: WA

Organization Name: C & M Orchards, Inc.

I feel that the natural sodium nitrate is an important ingredient in some of our organic fertilizer blends; a tool that is not necessarily used every year, but a tool that is important to us and should be in our bag.

Document Subtype: Comment

Status: Posted

Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time

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Comment Tracking Number: 80c1fe13

First Name: Edwin

## PRO – listing Sodium Nitrate with annotation

Last Name: Martin  
City: Penn Yan  
Country: United States  
State or Province: NY  
Organization Name: Wishing Well Farm

It is our only nitrogen source at this time except for animal manure. If they are going to ban anything they should ban chicken manure.

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Page Count: 0  
Comment Tracking Number: 80c1ee01

First Name: Dean  
Last Name: Berden  
City: Snover  
Country: United States  
State or Province: MI  
Organization Name: Dean Berden

I've been certified organic since 1988. Sodium Nitrate is not a chemical product. If we take that away we are going to get a lot of farmers who are using organic materials to stop doing that.

Document Subtype: Comment



**PRO – listing Sodium Nitrate with annotation**

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Page Count: 0  
Comment Tracking Number: 80c1f8ca  
First Name: Seth  
Last Name: Callen  
City: Roosevelt  
Country: United States  
State or Province: OK  
Organization Name: SpringHill Farm

Natural sodium nitrate is a reasonable and safe substance

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Page Count: 0  
Comment Tracking Number: 80c1f8c8  
First Name: Joseph  
Last Name: Yoder

**PRO – listing Sodium Nitrate with annotation**

City: Lewisburg  
Country: United States  
State or Province: PA  
Organization Name: Joseph Yoder

The use of natural sodium nitrate should be allowed because it's natural and organic.

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Status: Posted  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
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Page Count: 0  
Comment Tracking Number: 80c1d636  
First Name: Paul  
Last Name: Sachs  
City: Bradford  
Country: United States  
State or Province: VT  
Organization Name: North Country Organics

Sodium nitrate is the only cold soil nitrogen organic growers can use and, given the restrictions by which they must abide, the amount that's typically applied wouldn't cause the potential environmental detriment outlined in the NOSB Committee discussion. If there's evidence to the contrary, I'd like to see it.

Document Subtype: Comment

**PRO – listing Sodium Nitrate with annotation**

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Page Count: 0  
Comment Tracking Number: 80c1e29d  
First Name: ROBERT  
Last Name: DE BOOM  
City: DELAVAN  
Country: United States  
State or Province: WI  
Organization Name: VDB FARMS, LLC

I believe it is a good source for farmers to use and support the effort to keep it in place.

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Page Count: 0  
Comment Tracking Number: 80c1e4cb  
First Name: Donald  
Last Name: Bleeck

**PRO – listing Sodium Nitrate with annotation**

City: Carpenteria  
Country: United States  
State or Province: CA  
Organization Name: Suncoast Nursery

To me it is a very important source of Nitrogen, especially because in my specific organic program I'm trying not to use any animal products. My customers are Vegans, so if you take away my Chilean Sodium Nitrate I'm going to have nothing. That's why it's important to me and I ask you not to cut off that one source.

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Comment Tracking Number: 80c1e2e8

First Name: Elizabeth  
Last Name: Ryder  
City: Brewster  
Country: United States  
State or Province: NY  
Organization Name: Ryder Farm Cottage Industries

I think farmers should be able to use natural sodium nitrate. Natural Sodium Nitrates are an important element in the organic farmers tool chest of growing methods.

Document Subtype: Comment

**PRO – listing Sodium Nitrate with annotation**

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Page Count: 0  
Comment Tracking Number: 80c1e316  
First Name: Richard  
Last Name: Ward  
City: Whiteville  
Country: United States  
State or Province: NC  
Organization Name: Ward Brothers Farm

It's a big help to use and a supplement for our crops. I don't understand why they want to try to take it away.

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Page Count: 0  
Comment Tracking Number: 80c1d7ce  
First Name: Gayla

**PRO – listing Sodium Nitrate with annotation**

Last Name: Lyons  
City: Fayetteville  
Country: United States  
State or Province: TX  
Organization Name: Finc Pura Vida

We should use Natural Sodium Nitrate because it boosts crop production and doesn't harm anything. They eyes tell the truth, everything is happy and healthy. It's an amazing product that makes organic surpass the conventional.

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Page Count: 0  
Comment Tracking Number: 80c1e83b

First Name: Adam  
Last Name: Flyte  
City: Coloma  
Country: United States  
State or Province: WI  
Organization Name: Flyte Family Farm

We need Chilean nitrate as part of our organic foliar plant program!

Document Subtype: Comment

**PRO – listing Sodium Nitrate with annotation**

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Page Count: 0  
Comment Tracking Number: 80c1e301  
First Name: Deborah  
Last Name: Lain  
City: Westtown  
Country: United States  
State or Province: NY  
Organization Name: Kezialain Farm

I support it. I don't believe it is a hazard and it is a tool that organic farmers need for certain things when growing certain crops.

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Page Count: 0  
Comment Tracking Number: 80c1d5db  
First Name: Louis

**PRO – listing Sodium Nitrate with annotation**

Last Name: Reuschel  
City: Golden  
Country: United States  
State or Province: IL  
Organization Name: Ocean Farm

It's important for organic farmers to be able to use Natural Sodium Nitrate. I don't think it's going to hurt the structure or quality of the products in any way.

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Page Count: 0  
Comment Tracking Number: 80c1d653

First Name: Dean  
Last Name: McIvain  
City: West Salem  
Country: United States  
State or Province: OH  
Organization Name: Twin Parks Farm

It's a natural product. Without any alteration it should be allowed. It is a valuable tool. Nitrogen is a difficult commodity to acquire and this is a good organic source.

Document Subtype: Comment



**PRO – listing Sodium Nitrate with annotation**

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Page Count: 0  
Comment Tracking Number: 80c1d64a  
First Name: Ronald  
Last Name: Allen  
City: Citra  
Country: United States  
State or Province: FL  
Organization Name: Allen Blueberry, Inc.

In organic farming we are limited to so few products in the first place and to be able to have the natural sodium nitrate would benefit us tremendously.

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Page Count: 0  
Comment Tracking Number: 80c1e4d0  
First Name: Nick

**PRO – listing Sodium Nitrate with annotation**

Last Name: Seaton  
City: Earth  
Country: United States  
State or Province: TX  
Organization Name: N & K Farms

Natural Sodium Nitrate makes the crops better.

Document Subtype: Comment  
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Comment Tracking Number: 80c1e311

First Name: Gordon  
Last Name: Bednarz  
City: Glastonbury  
Country: United States  
State or Province: CT  
Organization Name: Bednarz Farm

I think it is a very worthwhile nitrogen supplement that should be available to organic farmers. As far as I know it is an organic project. From my research I don't see why it should be considered otherwise. It comes from organic sources. Even though I haven't used it myself I'd like to have that option available to me.

Document Subtype: Comment

## PRO – listing Sodium Nitrate with annotation

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Comment Tracking Number: 80c1e868

First Name: Reginald

Last Name: Destree

City: Madison

Country: United States

State or Province: WI

Organization Name: Livestock Nutritionist and Organic Grower

I encourage the continuation of the 20% rule for the use of Chilean nitrate (CN) as a crop production input. CN is a very beneficial and economic natural resource for balancing nutrient feedstuffs. It helps organic graziers with issues regarding seasonal grass production plus nutritionally balanced feed production. With the use of just 6 lbs (1# actual Nitrogen) CN a foliar spray applied twice per growing season, the quality and quantity of forage is respectively increased and includes more balanced nutrients. Farm field trials from 2002 to 2010 and grazing research published by Glacierland, RC&D, Green Bay, WI (2006-2007) supports the claims of the CN in combination with other crop inputs promotes nutrient dense dairy and beef feed. CN is a naturally mined fertilizer containing nitrate nitrogen and sodium (Na). Both of these inputs are necessary for organic livestock farms, particularly dairy farmers. Nutritionally, alfalfa and grass can have nutrient imbalance issues related to calcium and potassium. This is very unhealthy for the cows. The ideal ratio is 1 part calcium (Ca) and 1.1 parts potassium (K). Generally it is common for these ratios to be 1 part Ca to 5 parts K. To correct this problem, Na and sulfur should be added to the plant to avoid excessive K accumulating in the plants. The use of CN as a foliar program supports the Ca-K ratio for nutritious grass by offering the sodium ion in the foliar application. It is common to find soil tests with inadequate sodium. The base saturation in the soil requires 2% Na. Generally, the soils are 0.2-0.4% Na in the Great Plains, Midwest and Great Lakes states. As crop producers, where will we get the Na? Certifiers seem to be confused about the significance of these soil test nutrients. As a livestock nutritionist and organic grower, again, I speak in favor of the continuation of the 20% rule for the use of CN as a crop production input. The supporting research is available on request.

Document Subtype: Comment

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Page Count: 0  
Comment Tracking Number: 80c1d5bc  
First Name: John  
Last Name: Noble  
City: Pecos  
Country: United States  
State or Province: TX  
Organization Name: Nu-Way Organics

We need some form of nitrogen.

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Page Count: 0  
Comment Tracking Number: 80c1d815  
First Name: Robert  
Last Name: Gorsuch

**PRO – listing Sodium Nitrate with annotation**

City: Auburn  
Country: United States  
State or Province: WA  
Organization Name: GREEN VALLEY FARM

Because they are asking to continue to use it.

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Page Count: 0  
Comment Tracking Number: 80c1d78c  
First Name: Doug  
Last Name: Gunnink  
City: Gaylord  
Country: United States  
State or Province: MN  
Organization Name: Dutch Mill Farm

It has come to my attention that Chilean Nitrate is being reviewed by NOP for organic production. I am writing to strongly support the continued allowance of this product with a restricted use, as it is currently listed. As a farmer and consultant to organic livestock farmers, who use pasture as part or all of the summer feed for their cows, I have seen consistent improvement in palatability and sugar content of the grass when a small amount of Chilean Nitrate was applied. As the former 'On-farm research coordinator' for the Minnesota Department of Agriculture – Sustainable Agriculture Program, I set up demonstration plots on dairy farms, applying Chilean Nitrate to pastures. Results of these test plots showed an increase in dry matter intake of grass when Chilean Nitrate was applied at the rate of five pounds per acre. There was also an increase in the sugar or non-fiber carbohydrates of the grass. This reduced the need for grain to be fed to cows, and still maintained economical production. I don't know of another option/product, which achieves the same results for farmers who are in the process of

**PRO – listing Sodium Nitrate with annotation**

building their organic soils and future productivity. Many of our dairy and beef producers benefit from its availability. Therefore, I support allowing Chilean Nitrate use in organic production.

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Page Count: 0  
Comment Tracking Number: 80c1e861  
First Name: Jerry  
Last Name: Carlson  
City: Cedar Falls  
Country: United States  
State or Province: IA  
Organization Name: Renewable Farming LLC

America's organic producers need reliable, health-giving sources of nitrogen for quality production. How can the NOP and USDA deny Chilean nitrate as an organic product on one hand, yet claim to be supporting organic technology on the other? This regulatory quashing by NOSB has much more of a political overtone than one designed to assist the organic community. On top of the unbelievable approval of RR alfalfa by USDA, it's a discouraging regulatory environment for organic producers.

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Page Count: 0  
Comment Tracking Number: 80c1d808  
First Name: James  
Last Name: Brown  
City: Vasser  
Country: United States  
State or Province: MI  
Organization Name: Brown Farm

Anything we use in organic farming is natural. I can't see why it should be banned.

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Page Count: 0  
Comment Tracking Number: 80c1e46e  
First Name: Chris  
Last Name: Waesche  
City: Martinsburg  
Country: United States  
State or Province: WV  
Organization Name: Jubilee Organic Farm

Big problem with national standards taking out ingredients that we have used in the past. Nitrogen is one of those elements that reaches out of the soil that we continually renew in our crop production. We

## PRO – listing Sodium Nitrate with annotation

definitely would like to keep that nitrogen source in our facility program. Nitrogen organically is one of those elements that is difficult to have available for your plant.

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Page Count: 0  
Comment Tracking Number: 80c1e813  
First Name: Dieter  
Last Name: Harle  
City: Battendorf  
Country: United States  
State or Province: IA  
Organization Name: Best Options, Inc

Chilean Nitrate is a mined product out of Chile. It is a natural source of nitrate nitrogen, totally organic. In my consulting practice throughout the Midwest we find this product as very valuable. The importance of having this product to feed grass and forages like alfalfa as use of natural nitrogen sources in foliar feeding make a huge impact on forage production yield and quality. It provides wonderful alternatives and it works! Please keep this product available for organic and agricultural use!

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Page Count: 0  
Comment Tracking Number: 80c1e885  
First Name: Art  
Last Name: Scheele  
City: Warren  
Country: United States  
State or Province: IL  
Organization Name: American Organic Seed

We need the Chilean nitrate for our early plant development. Corn yield development especially, is so critical in the early stages. The corn plant does not add yield once that ear has been determined.

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Comment Tracking Number: 80c1e4e5  
First Name: David  
Last Name: Smith  
City: Olton  
Country: United States  
State or Province: TX  
Organization Name: Smith Land and Cattle

We've got to have some source of natural sodium nitrate to raise organic crops.

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Page Count: 0  
Comment Tracking Number: 80c1e4d0  
First Name: Nick  
Last Name: Seaton  
City: Earth  
Country: United States  
State or Province: TX  
Organization Name: N & K Farms

Natural Sodium Nitrate makes the crops better.

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Page Count: 0  
Comment Tracking Number: 80c1d814

**PRO – listing Sodium Nitrate with annotation**

First Name: Alan  
Last Name: Kobernik  
City: Frankfort  
Country: United States  
State or Province: MI  
Organization Name: NORTH STAR ORGANICS

At least in our circumstance it is a very useful tool. Obviously used sparingly. I think probably there should be significant research done so that it is not harming things.

Document Subtype: Comment  
Status: Posted  
Received Date: April 06 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 08 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1d6fe  
First Name: Joseph  
Last Name: Paff  
City: Petrolia  
Country: United States  
State or Province: CA  
Organization Name: joseph paff

I support the allowable use of Chilean nitrates. Like many soil amendments it must be used intelligently with awareness of all other practices. This is part of the general organic program and is spelled out in the overall plan. The objection that it has a good reputation and that this results in a bad "psychological" effect is a condescending paternalism that ignores the overall approach that is fundamental to organic farming and good practice. I have farmed organically since the mid seventies. I also am a "certified organic" food processor through the CCOF. Many products can of course be

**PRO – listing Sodium Nitrate with annotation**

"abused" when combined with bad practices. This is dealt with not by lists of bad products or complaints about Chilean labor practices---but by an evaluation of the overall management plan by the certifying agency. Thank you. Sincerely yours,, Joseph paff

Document Subtype: Comment  
Status: Posted  
Received Date: April 06 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 08 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1d648  
First Name: Dale  
Last Name: Neff  
City: Cody  
Country: United States  
State or Province: WY  
Organization Name: Heart Mountain Valley Ranch

Natural Sodium Nitrate is one of our main tools and that's what we need.

Document Subtype: Comment  
Status: Posted  
Received Date: April 07 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 08 2011, at 12:00 AM Eastern Daylight Time

**PRO – listing Sodium Nitrate with annotation**

Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1e86e  
First Name: Ernie  
Last Name: Miller  
City: Middlebury  
Country: United States  
State or Province: IN  
Organization Name: Ernie Miller

Chilean nitrate is a valuable source of nitrogen which is important in topdressing grazing pastures and corn a heavy nitrogen user.

Document Subtype: Comment  
Status: Posted  
Received Date: April 07 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 08 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1d804  
First Name: Steven  
Last Name: Booms  
City: Ruth  
Country: United States

## PRO – listing Sodium Nitrate with annotation

State or Province: MI  
Organization Name: Booms Farm

We need Sodium Nitrate to help insure the production of our organic products.

Document Subtype: Comment  
Status: Posted  
Received Date: April 06 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 08 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0

Comment Tracking Number: 80c1d7b3

First Name: Reginald  
Last Name: Destree  
City: Madison  
Country: United States  
State or Province: WI  
Organization Name: Organic Marketing, Inc

I support the continuation of the 20% rule for the use of Chilean nitrate (CN) as a crop production input. Why is it ok to ship organic grain to the EU? Why is it wrong to import CN. We can ship 50 bushels of wheat (3000#) to Europe yet we are bashed for shipping 10-25# Chilean nitrate. The reason we produced 50 bushels of wheat per acre was because we applied 10-25# of Chilean nitrate when the hard red winter wheat was 4-5 inches tall and the soil temperature was 40-45 degrees. That is when the CN is beneficial! Why do we continually here about the 20% rule relating to Chilean nitrate. No organic farmer can afford to apply anywhere that amount of CN. CN is a very beneficial and economic natural resource; yet it continually is bashed for the carbon foot print. Let's identify it for what it is an organic nitrate nitrogen source for the application to crops when the biology in the soil is not active. Biological activity is maximized in the soil when the soil temperature is between 65 and 80 degrees. Until then we are limiting the plants ability to maximize yield. The 20% rule relates to organic crop inputs it does not relate to the politics of IFOAM, EU or Canada equivalency. As growers, why should we limit our ability to supply the organic customers with fresh fruits, vegetable, milk and meat because of some ones agenda relating to trade barriers that IFOAM has used for 9 years. Let's consider our NOP production first, then deal with the trade issues Again, I speak in favor of the continuation of the 20% rule for the use of CN as a crop production input.

**PRO – listing Sodium Nitrate with annotation**

Document Subtype: Comment  
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Received Date: April 07 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 08 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1e856  
First Name: John  
Last Name: Schlabach  
City: Orrville  
Country: United States  
State or Province: OH  
Organization Name: John Schlabach

As a consultant and a supplier of crop inputs and nutrients I am concerned about losing Chilean nitrate as a nitrogen source, especially early in the season before the soil microbial processes can supply nitrogen. My clients have been relying on using a small amount of Chilean nitrate for years for this purpose and there is no other good alternative.

Document Subtype: Comment  
Status: Posted  
Received Date: April 06 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 06 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0

**PRO – listing Sodium Nitrate with annotation**

Comment Tracking Number: 80c1d599

First Name: John  
Last Name: Remmele  
City: Redwood Falls  
Country: United States  
State or Province: MN  
Organization Name: John Remmele

It is very difficult to find other sources of nitrogen. Natural Sodium Nitrate is a very needed source that really helps my production. Especially corn in the early stages. I just really like the product.

Document Subtype: Comment  
Status: Posted  
Received Date: April 05 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 06 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0

Comment Tracking Number: 80c1c6f3

First Name: Thomas  
Last Name: Besecker  
City: Greenville  
Country: United States  
State or Province: OH  
Organization Name: Besecker Farms

I have been a certified organic grower since 2001. Our first years were short on profits because crops had Nitrogen deficiencies. Our Wheat crops, lacked early nitrogen for proper tillering. Without early nitrate nitrogen, wheat is both low in yield and protein content. Organic corn yields were also low in



## PRO – listing Sodium Nitrate with annotation

spite of manure use. Soils need to be 65 to 75 degrees to stimulate nitrogen release from manures and soil microbes. Limiting N during key plant stages reduces yield. Upon searching for a remedy to nitrogen deficiency, Sodium Nitrate (CN) was obviously the better choice. Meat and blood meal use, foster anaerobic conditions leading to more insects and disease. There is not enough good finished compost out there to go around, manures were available but much less efficient, more acidic and need more lime for buffering. CN is alkaline, doesn't need buffering, has a positive impact on the soil organic matter, and leaches 20% less than nitrogen from manures. I even read that Sodium Nitrate is mined and processed quite efficiently, using renewable solar energy. From 2006-2010 we have been using CN in low rate, multiple applications, both in liquid and dry forms, for a total of 5 to 15% of the crop's nitrogen need. Yields are up 50%, while low quality crops and nitrogen deficiency are almost eliminated. Many certified organic growers, who currently use CN, have the same thoughts and concerns. I'm concerned when I hear that Sodium Nitrate may no longer be approved for NOP crop production at 20% of the crops nitrogen need. I believe CN is by far the most efficient and sustainable organic Nitrogen product available. It would be an injustice to prohibit its use for growing profitable organic crops. Please consider this letter as my way of reflecting upon the fertility needs of our own operation. Without the use of CN products, profits, quality and production of certified organic grain, pastures and vegetable crops will decrease considerably, for other farms, too.

Document Subtype: Comment  
Status: Posted  
Received Date: March 31 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 04 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c182f0  
First Name: Edward  
Middle Name: H  
Last Name: Gold  
City: Garwood  
Country: United States  
State or Province: TX  
Organization Name: Gold Farms

Sodium Nitrate is very important in our organic operation. Chicken litter is applied before planting a rice crop. In order to make a yield that is profitable a midseason application of an organic fertilizer is necessary. The only product that can be economically applied by an airplane is Sodium Nitrate, without this product organically grown rice would not be profitable.

**PRO – listing Sodium Nitrate with annotation**

Document Subtype: Comment  
Status: Posted  
Received Date: March 25 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: March 28 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c10de5  
First Name: Adrian  
Last Name: Monfils  
City: Luxemburg  
Country: United States  
State or Province: WI  
Organization Name: Adrian Monfils

I support the use of Chilean nitrates I just believe this is a great starter for our cold soil types in Wisconsin. Thank you

Document Subtype: Comment  
Status: Posted  
Received Date: March 22 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: March 23 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time

**PRO – listing Sodium Nitrate with annotation**

Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time

Page Count: 0

Comment Tracking Number: 80c0e47c

First Name: Aaron

Middle Name: T

Last Name: Locker

City: waitsfield

Country: United States

State or Province: VT

Organization Name: kingsbury market garden

We operate a small vegetable farm in north central VT that is not certified organic but uses only certified organic inputs. We have found chilean nitrate to be essential to producing high yields in our cold climate. We have found that judicious use of chilean nitrate allows us to lower our total fertilizer use. We believe that is due to the consistent release of nitrogen at the time of application which in our mind leads to less leaching of nutrients. I suspect that if chilean nitrate was banned it would lead to lower yields on some of our most important crops like onions. This would force us to raise our prices.

Document Subtype: Comment

Status: Posted

Received Date: March 18 2011, at 12:00 AM Eastern Daylight Time

Date Posted: March 21 2011, at 12:00 AM Eastern Daylight Time

Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time

Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time

**PRO – listing Sodium Nitrate with annotation**

Page Count: 0  
Comment Tracking Number: 80c0af35  
First Name: Lawton  
Middle Name: Chad  
Last Name: Heard  
City: Newton  
Country: United States  
State or Province: GA  
Organization Name: citizen

My name is Chad Heard an I am a certified organic grower in Baker Co Georgia. 2010 is my third year being certified. We need sodium nitrate as a nitrogen source. nitrogen or the lack of is our greatest limiting factor in organic production. if we lose sodium nitrate, we will be forced to go back to conventional farming methods. i have invested six years trying to develop our organic production system. i really would hate to lose all my investment. Organic farming is very difficult. do not make it impossible by removing Chilean nitrate from the approved list. sincerely, Chad Heard

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0

Comment Tracking Number: 80c1f8b1  
First Name: Denise  
Last Name: Wells  
City: Maxwell  
Country: United States

## PRO – listing Sodium Nitrate with annotation

Organization Name: L. Allen Wells Jr & Denise Wells

Anything natural (i.e. natural sodium nitrate) is better than trying to go with anything non-natural.

Document Subtype: Comment

Status: Posted

Received Date: April 07 2011, at 12:00 AM Eastern Daylight Time

Date Posted: April 08 2011, at 12:00 AM Eastern Daylight Time

Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time

Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time

Page Count: 0

Comment Tracking Number: 80c1dd19

First Name: Eric

Last Name: Baratta

City: EDGEWATER PARK

Country: United States

Organization Name: Eric Baratta

Government Agency Type: Federal

Government Agency: ARS

I would ask you to institute the following: 1. To discontinue streptomycin and tetracycline use in organic fruit production by allowing streptomycin to sunset and rejecting the petition to repeal the 2012 phase-out of tetracycline. 2. Change the Crops Committee recommendation to read: Chlorine materials (calcium hypochlorite; chlorine dioxide; and sodium hypochlorite)—Residual chlorine levels in the water in direct crop contact or as water from cleaning irrigation systems applied to soil or for disinfecting and sanitizing equipment or tools should not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act. 3. CSL must be found under the organic guidelines to be a synthetic material and therefore subject to health and environmental review by the NOSB. 4. Support the Crop Committee's addition of a periodic testing requirement to ensure that copper residues do not build up in the soil to the extent that they pose a threat to soil-dwelling organisms. 5. Support the recommendation of the Crops Committee to deny the petition to allow nickel as a micronutrient. Nickel is toxic and a known human carcinogen, and supplements are not needed. 6. Support Crops Committee recommendation as amended below: List pheromones for insect management on §205.601, provided that they are identical to or substantially similar to natural pheromones as defined in 40 CFR 152.25(b), in passive dispensers, without added toxicants, and with only approved inert ingredients. 7. Relist sodium nitrate § 205.602(g) without annotation. 8. Do not

## PRO – listing Sodium Nitrate with annotation

allow the use of D3 as a pesticide. 9. Do not allow use of Lignin sulfonate in crop production/preparation. 10. Do not allow use of Magnesium sulfate as a micronutrient--allow use of non-synthetic alternatives.

Document Subtype: Comment  
Status: Posted  
Received Date: April 04 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 05 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1b66d  
First Name: Ann  
Last Name: Law  
City: Apalachin  
Country: United States  
Organization Name: Concerned Citizen

Support the recommendation of the Crops Committee to deny the petition to allow nickel as a micronutrient. Nickel is toxic and a known human carcinogen, and supplements are not needed. List pheromones for insect management on §205.601, provided that they are identical to or substantially similar to natural pheromones as defined in 40 CFR 152.25(b), in passive dispensers, without added toxicants, and with only approved inert ingredients. There may be other pheromone products that should be listed on §205.601, but the petition process should be used in order to determine whether they meet OFPA's legal criteria. Re-list sodium nitrate § 205.602(g) without annotation. Sodium nitrate is a natural form of soluble nitrate that is mined in Chile. Its listing on § 205.602 indicates that it is a prohibited natural material, with the exception noted in the annotation. Sodium nitrate is not permitted at all in organic production in most countries because the use of soluble fertilizers is considered to be contrary to organic principles. Re Vit D3, the technical review prepared for the committee suggests that there are several alternative materials and practices that some farmers are currently using and which more could use. These include castor bean oil, which is known to be a rodent repellent, as well as practices such as planting naturally repellent crops, use of mechanical traps, and introduction of natural predators, such as cats or owls.

Document Subtype: Comment

**PRO – listing Sodium Nitrate with annotation**

Status: Posted

Received Date: April 10 2011, at 12:00 AM Eastern Daylight Time

Date Posted: April 13 2011, at 12:00 AM Eastern Daylight Time

Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time

Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time

Page Count: 0

Comment Tracking Number: 80c21117

First Name: Gwendolyn

Last Name: Wyard

City: Corvallis

Country: United States

Organization Name: Organic Trade Association

Please find the attached comments on the Crops Committee Recommendations on Petitioned and Sunset Materials. Sincerely, Gwendolyn Wyard Associate Director of Organic Standards and Industry Outreach Organic Trade Association

[...]

**Sulfur Dioxide (Sunset Item)**

The Crops Committee decision is based on a new Technical Review stating that sulfur dioxide may not be the appropriate active ingredient in smoke bombs and is not listed by EPA for use as a rodenticide. However, U.S. EPA has registered rodent control smoke bombs with the active ingredients sulfur, charcoal carbon, and sodium nitrate or potassium nitrate (saltpeter). Neither the Committee nor the Technical Review indicates any alternative methods, which are feasible on a commercial scale for the control of underground rodents. Predator species should be encouraged, but without the option of smoke bombs organic producers may be subject to gopher population cycles that are not able to be kept in check with biological controls (predators) alone.

[...]

Document Subtype: Comment

Status: Posted

Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time

Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time

## PRO – listing Sodium Nitrate with annotation

Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time

Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time

Page Count: 0

Comment Tracking Number: 80c1feea

First Name: David

Last Name: Mattocks

City: Bainbridge

Country: United States

State or Province: PA

Organization Name: The Fertrell Company

See attached file(s)

[...]

### Sodium Nitrate (Chilean Nitrate)

We understand and appreciate the political pressure to prohibit all uses of sodium nitrate in organic production. It may facilitate harmonization with other standards such as Canada and the EU, which prohibit this material. However, two important points need to be made here:

1. There is no evidence that this material is problematic or out of sync with organic farming with the limitations currently imposed that that sodium nitrate can not be more than 20% of the crop's total nitrogen requirement.
2. Equivancy agreements are just that – recognition that the standards of two sovereign entities are equivalent and accomplish the same goals, but are not identical.

So, in reviewing the use of sodium nitrate, a natural mined substance, in an ideal world, we should keep in mind the overall goals of organic agriculture and make the decision based on whether it is compatible with our principles, not someone else's perceptions.

[...]

Status: Posted

Received Date: September 28 2010, at 12:00 AM Eastern Daylight Time



**PRO – listing Sodium Nitrate with annotation**

Date Posted: September 28 2010, at 12:00 AM Eastern Daylight Time

Comment Start Date: July 20 2010, at 12:00 AM Eastern Daylight Time

Page Count: 0

Comment Tracking Number: 80b6203b

First Name: Alexander

Middle Name: C

Last Name: McGregor

Country: United States

Comment

[...]

The authors site a book from Boca Raton, Florida indicating that earthworms are very sensitive to ammonia-based fertilizers. They are apparently unaware of regional advances in nutrient placement that have enabled farmers to apply nitrogen, sulfur, and phosphorous directly in the root zone where it will be used by the growing crop. Making the nutrients available to the growing crop minimizes any potential for harm to any invertebrates in the soil.

The petitioners indicate that soil acidification is worsened by moldboard plowing. Perhaps so but moldboard plows have not used in the Palouse for many years. They quote a 65 year old study about the deleterious effects of sodium nitrate fertilizer—never used in the Palouse.<sup>18</sup>

[...]

Document Subtype: Comment

Status: Posted

Received Date: April 01 2011, at 12:00 AM Eastern Daylight Time

Date Posted: April 04 2011, at 12:00 AM Eastern Daylight Time

Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time

## PRO – listing Sodium Nitrate with annotation

Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time

Page Count: 0

Comment Tracking Number: 80c1a13d

First Name: Molly

Middle Name: P

Last Name: Hauck

City: Kensington

Country: United States

State or Province: MD

Organization Name: Citizen

Government Agency Type: Federal

1. IDENTIFYING/REVIEWING SYNTHETICS IN ORGANICS- corn steep liquor (CSL).Action: Find that CSL is synthetic. Whether an input is synthetic does not always determine whether it is allowable in organic. It simply ensures that the NOSB carries out its responsibility to review and evaluate whether the use of that synthetic material meets the law's standards of sustainability. Organic integrity is built on objective review and transparency to ensure that the organic consumers' expectations are being met and that there is a level playing field for all those engaged in organic production. The process of making CSL is different than the natural practices defined in our standards because it requires adding a synthetic chemical to an otherwise natural steeping/lactic acid fermenta 2. CLASSIFICATION OF MATERIALS Action: (i) Reject the committee recommendation on "significant level of a synthetic substance" because it relies on standards that are not part of OFPA and does not allow the application of OFPA standards to low levels of synthetic substances; (ii) Define "significant level of a synthetic substance" as "any known level of a synthetic substance in the final material or in the environment, as a result of the substance's manufacture, use and disposal." 3. Materials ANTIBIOTICS Support Crops Com rec. to discontinue streptomycin & tetracycline use in organic fruit production by allowing streptomycin to sunset & rejecting petition to repeal 2012 phase-out of tetracycline. NICKEL Support rec of Crops Com to deny petition to allow nickel as micronutrient. Nickel is toxic & a human carcinogen; supplements are not needed. CHLORINE Change Crops & Handling Coms. recs to: All use of chlorine must comply with Safe Drinking Act. COPPER COMPOUNDS Ensure that copper residues do not build up in soil to extent that they pose a threat to soil-dwelling organisms PHEROMONES identical to natural pheromones SODIUM NITRATE use is restricted to 20% of the crop's total nitrogen

## PRO – listing Sodium Nitrate with annotation

April 10, 2011

National Organic Standards Board Meeting, April 26-29, 2011  
Red Lion Hotel  
5<sup>th</sup> Avenue  
Seattle, WA

Re: Call for public comment, 205.602 Sodium Nitrate sunset

We are writing in support of relisting sodium nitrate 205.602(g) *with* annotation “- unless use is restricted to no more than 20% of the crop’s total nitrogen requirement.”

Arguments opposing the use of naturally occurring Chilean Nitrate (CN) (in *any* amount) primarily fall into two categories: 1) that it is harmful to the environment because of general mining practices required to produce it, and 2) that it is inconsistent with organic practices because excessive nitrogen applications harm the natural balance of soil nutrients thereby reducing the ability of the soil to sustainably deliver required crop inputs.

The former argument should be approached from a practical perspective and must be left to global mining oversight organizations to determine and develop best-practices. If concerns over mining methods are to be assessed for the approval of NOP practices and inputs, then virtually all organic farming practices and materials must be considered harmful to the environment. To limit this consideration to only a few inputs would be arbitrary.

The second argument tends to project the potential harm of poor application practices as general characteristics of CN, in particular because of its soluble nature. Any material can create environmental harm if applied in excess. Furthermore, CN is generally used as an input to a fertilizer blend, recipe, or seasonal protocol, not as a primary or excessive input. Additionally, it is because of its soluble nature that it lends itself to foliar application which has been proven to improve soil microbial activity. Finally, the 20% limitation ensures that it cannot be applied excessively.

CN is the safest and most cost-effective form of nonsynthetic nitrogen input for crop production. Alternative nitrogen inputs, primarily animal-byproducts, carry significant health or hygiene risks and often require greater application volumes. It is also an important source of sodium needed for nutritionally balanced soil.

Chilean Nitrate is an important input for materials used for a holistic approach to organic farming. By fully excluding the safest and most cost-efficient natural source of nitrogen and sodium, the NOSB will effectively limit farmers’ options to other nonsynthetic sources more harmful to human health and the environment or to synthetic, inorganic sources.

For these reasons, we support the conservative approach to relist sodium nitrate annotated with the 20% limitation.

Dramm Corporation, producer of Drammatic Fish Fertilizer

Kurt Dramm, President

Document Subtype:           Comment

**PRO – listing Sodium Nitrate with annotation**

Status: Posted

Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time

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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time

Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time

Page Count: 0

Comment Tracking Number: 80c1f84c

First Name: Gerald

Middle Name: A.

Last Name: Davis

City: Lamont

Country: United States

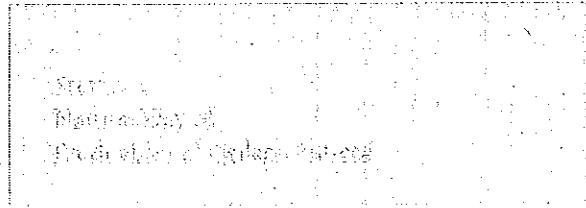
State or Province: CA

Organization Name: Crystal Organic Farms

See attached file(s)

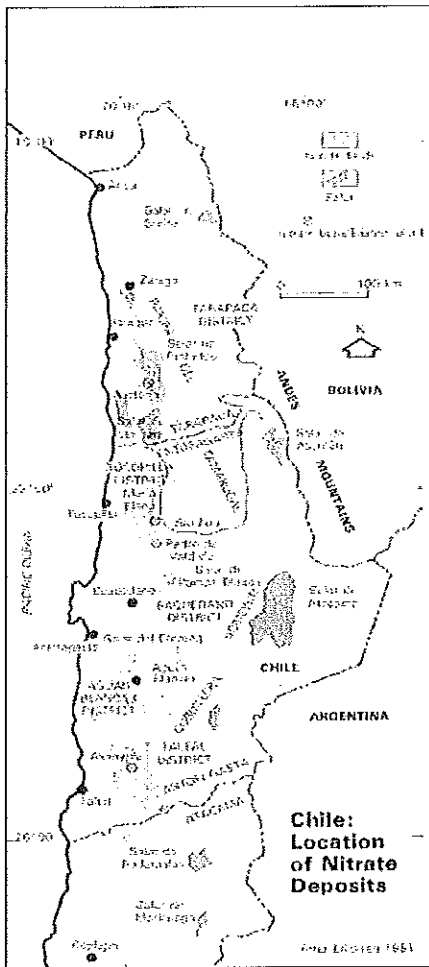
PRO – listing Sodium Nitrate with annotation

NATURAL NITROGEN  
NITROGENOUS ROCK



2.1 Location of the Natural Chilean Nitrogenous rock

Natural Chilean Nitrate is mined from natural deposits of "caliche". The nitrate ore, "caliche", is found in the Tarapacá and Antofagasta regions , where the extremely arid Chilean desert is located,



in a discontinuous strip on the eastern slopes of the pacific coastal range between the latitudes of 19° and 26° (Figure 16). The lack of moisture has prevented the weathering of the surface rocks (parent material) and the development of living organisms (microbial, vegetal, animal, human) two main factors in the process of soil formation and as a direct consequence, no soil development process has ever occurred in the Atacama Desert. This region is similar to the areas of Mars investigated by the Viking missions (Navarro-González et al., 2003).

"The Atacama is the only place on Earth (from which) I've taken soil samples to grow microorganisms back at the lab and nothing whatsoever grew" ... (F. A. Rainey in Navarro-González et al., 2003).

"In the driest part of the Atacama, we found that, if Viking had landed there instead of on Mars and done exactly the same experiments, we would also have been shut out" ... "The Atacama appears to be the only place on Earth Viking would have found nothing" ...

"During field studies, the team analyzed Atacama's depleted Mars-like soils and found organic materials at such low levels and released at such high temperatures that Viking would not have been able to detect them" (McKay in Navarro-González et al., 2003). McKay also noted that the team discovered a non-biological oxidative substance that appears to have reacted with organics – results that mimicked Viking's results.

Figure 16: Location of nitrogenous rock (Ericksen, 1981)



## PRO – listing Sodium Nitrate with annotation

“It is considered by many that there is no microbial life on the surface of Mars and that the soils there are inhospitable to microbial life” ... “The soils in the core region of the Atacama Desert would seem to fall into this category...” (F. A. Rainey in Navarro-González et al., 2003).

The reason Chile’s Atacama Desert is so dry and virtually sterile, the researchers say, is because it is blocked from moisture on both sides by the Andes and by coastal mountains. At 3,000 feet, the Atacama is 15 million years old and 50 times more arid than California’s Death Valley.

The age and aridity of the Atacama Desert are probably directly responsible for the large nitrate accumulations that are present there. The nitrates are likely to be of atmospheric origin (Ericksen, 1981).

### 2.2 Description of the Natural Chilean Nitrogenous rock

The deposits or “Caliche” occur in all types of rock and unconsolidated sediments without showing any systematic variation in mineral content. 98% of the nitrate (saltpeter) deposits are found under the formation of layers or strata. A succession of layers of varied thickness forms the nitrate (saltpeter) deposits.

Most widespread are the unconsolidated regolith, conglomerates of insoluble and barren material cemented by soluble oxidized salts; predominantly sulphates, nitrates and chlorides of Na, K and Mg. Caliche does contain significant quantities of borates, chromates, chlorates and iodates. Apart from this, Natural Chilean Nitrate derived from caliche contains different trace, or minor, elements including iodine, copper, zinc, boron and molybdenum.

As one can observe from Table 16 many minerals present in caliche are as such already allowed in organic agriculture or at least very closely related to allowed substances.

In Table 17 a typical analysis of currently mined Caliche is presented.

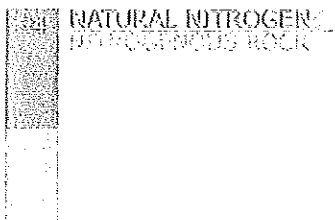
### 2.3 Geological origin

There are several theories on the formation and origin of the natural nitrogenous rock (Mueller, 1968). Almost all of them are based on bacterial mineralization:

- ① Production of nitrate through bacterial decay and action of nitrifying bacteria on organic matter of plant and animal remains;
- ② Leaching of guano on the margins of saline lakes inland arms of the sea, or salars;
- ③ Nitrification and fixation of atmospheric nitrogen by bacteria in the soil;
- ④ Deposition of atmospheric saline materials at or near the sites of the deposits.

Their discussion is beyond the scope of this document and the interested reader is referred to Ericksen, G.E. (1981) for a presentation of his own investigations and a well documented discussion of the subject.

Nevertheless, it should be noted that the single most important factor in the accumulation



PRO – listing Sodium Nitrate with annotation

Table 16:  
Some of the common saline minerals present  
in the caliche deposits (Garret, 1983)

Halides	Formula	Approved for organic farming (reference, Fib)
Halite	NaCl	approved
<b>Nitrates</b>		
Soda niter	NaNO <sub>3</sub>	Under review
<b>Borates</b>		
Ulexite	NaCaB <sub>3</sub> O <sub>6</sub> ·8H <sub>2</sub> O	very close to approved Na- borate mineral (Borax) but less soluble
Proberite	NaCaB <sub>3</sub> O <sub>6</sub> ·5H <sub>2</sub> O	very close to approved Na- borate mineral (Borax) but less soluble
Hydroboracite	CaMgB <sub>3</sub> O <sub>11</sub> ·6H <sub>2</sub> O	very close to approved Na- borate mineral (Borax) but less soluble
Colemanite	Ca <sub>2</sub> B <sub>4</sub> O <sub>11</sub> ·5H <sub>2</sub> O	very close to approved Na- borate mineral (Borax) but less soluble
<b>Sulphates</b>		
Thenardite	Na <sub>2</sub> SO <sub>4</sub>	approved
Kieserite	MgSO <sub>4</sub> ·H <sub>2</sub> O	approved
Epsomite	MgSO <sub>4</sub> ·7H <sub>2</sub> O	approved
Gypsum	CaSO <sub>4</sub> ·2H <sub>2</sub> O	approved
Anhydrite	CaSO <sub>4</sub>	very similar to approved product CaSO <sub>4</sub> ·2H <sub>2</sub> O
Bassanite	2CaSO <sub>4</sub> ·H <sub>2</sub> O	very similar to approved product CaSO <sub>4</sub> ·2H <sub>2</sub> O

of saline materials in the Atacama Desert has been the extreme aridity of the region which has existed for 10-15 million years. But although the climate of the Atacama Desert has been extremely arid throughout late Tertiary and Quaternary time, there have been intervals of climatic change when increasing rainfall greatly modified or destroyed preexisting nitrogenous rock deposits. According to Ericksen G.E. (1981), if the nitrogenous rock deposits were formed during the past 10-15 million years and if they have a complex history of repeated deposition and destruction, a rate of deposition whereby the nitrate might accumulate in 200,000 years is reasonable. That would be an estimated theoretical period of time for the formation of the present day deposits, with the added implication that no rainfall with nitrate leaching capacity has occurred during that period.

The nitrogenous rock occurs on a high plateau with essentially zero rainfall (< 2 mm precip. yr<sup>-1</sup>),

NATURAL NITROGENOUS ROCK



## PRO – listing Sodium Nitrate with annotation

Table 17:  
Caliche analysis (Garret, 1983)

Pure Caliche	Analysis Currently mined
NaNO <sub>3</sub>	6-10 wt%
Na <sub>2</sub> SO <sub>4</sub>	6-15 wt%
NaCl	6-10 wt%
K	0.4-1.0 wt%
Mg	0.2-0.8 wt %
Ca	1.0-1.25 wt %
IO <sub>3</sub>	0.04-0.08 wt %
B <sub>4</sub> O <sub>7</sub>	0.3-1.0 wt %
H <sub>2</sub> O	1.1-2.0 wt %

bordered on the east by the high Cordillera of the Andes and on the west by the Pacific coastal range, both these areas catch what little rainfall is available. The high mountain area has about 150 mm yr<sup>-1</sup> of rain and the coastal range between 10 and 30 mm yr<sup>-1</sup>.

Nitrate rich soils occur locally in other deserts of the world but are nowhere as widespread as those found in the Atacama Desert.

### 2.4 History of Usage

Natural Chilean Nitrate is probably the oldest single nitrogen fertilizer. There is evidence that the pre-Inca culture of the Atacamenos employed high grade ores as a fertilizer in the 7<sup>th</sup> and 8<sup>th</sup> century. Tradition ascribes the rediscovery of the fertilizer properties of caliche, in the 17<sup>th</sup> century, to a priest who was brought "dirt that burns", by the Indians for analysis, and who then threw the remains onto his garden. Prior to 1800, the extraction of salpeter from caliche was performed by leaching ore in animal skins with cold water. The resultant solution was run into copper pots and concentrated.

In 1805 Tadeaus Haenke, a German naturalist living in Bolivia first identified that the principal nitrate in caliche was the sodium salt.

He developed a process to concentrate and retrieve the nitrates from the ore. Around 1880 when Darwin visited the small nitrate plants called "paradas" he reported the existence of iodine in the caliche. After discovery of the Bosh-Haber ammonia process and the world depression reduced the fertilizer prices the Chilean nitrate was replaced in great extend.

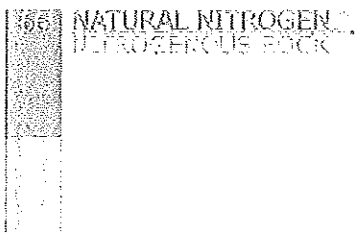






Figure 17: Mining of Natural Chilean Nitrate at the beginning of the century

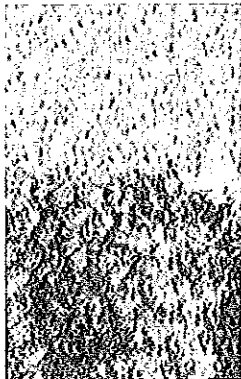
2.5 Mining, production process and disposal does not result in, or contribute to harmful effects on the environment

2.5.1 Mining method and ore preparation

The lack of moisture is a critical condition that has permitted the Chilean nitrate to remain in the superficial caliche layer of the desert for more than 200,000 years without a trace of leaching (Ericksen, 1981).

The caliche is mined in open pit areas. Based on general exploration on square grids, areas are laid out and combined to reach an average grade. After blasting and removing the overburden, the caliche is mined. Then the caliche is crushed over 3 stages until the size reached is about 8 mm.

2.5.2 Extraction process and crystallization



Only nitrate ore (caliche) is needed to produce sodium nitrate of natural origin (IFDC and UNIDO, 1998. Fertilizer Manual, p. 238). This is in sharp contrast with all potassium and magnesium sulphate fertilizers allowed in organic agriculture (see § 2.6.3).

The Caliche is grounded to a size of 1.0 centimeter and between 75 and 80% of the tonnage reduced to this size is deposited in large 10,000 m<sup>3</sup> capacity lixiviating vats. The fine residue from the grinding process is sent to a different leaching system, where iodine is recuperated.

Figure 18: Close-up view of caliche rock

NATURAL NITROGEN  
NITROGEN-ROCK



## PRO – listing Sodium Nitrate with annotation

Warm 48 °C “weak mother solutions” are circulated through the Caliche particles in the vats, until the solution is saturated in sodium nitrate becoming a “strong mother solution”. The strong solution is cooled to 12°C in order to crystallize and precipitate the dissolved sodium nitrate. After recovering dissolved iodine at the iodine plant, the resulting “weak mother solution” is sent back to the leaching vats to a new cycle in the close leaching-precipitation circuit. In the close leaching circuit water may be lost only by evaporation.

New fresh water is not used in the leaching cycle, except when is needed to displace the “strong mother solution” from the refuse. Due to limitations in the quantity of water used to wash the refuse and since this limited volume is not fully efficient in displacing all the “strong solution” the retrieval of the sodium nitrate from the Caliche is only about 75%.

The crystallized sodium nitrate is centrifuged and prilled, being ready to be used as a source of natural nitrate nitrogen in crop production.

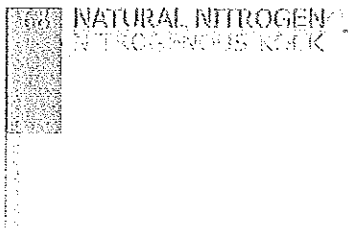
### Solar Evaporation System

Through the cooling and centrifugation process, only sodium nitrate and iodine can be recuperated from the Caliche ore. However, the Solar Evaporation System (SES) permits the retrieval of additional nitrate and other salts from the “weak mother solution” before it is recycled to the leaching vats. The SES is also used to concentrate solutions produced by “heap leaching” of old refuse piles of caliche ore, that was processed many years ago to extract Natural Nitrate using less efficient processes.

The operation of the SES begins by adding additional water to the refuse wash in the leaching vats. The water not only displaces additional sodium nitrate that otherwise goes with the refuse, but it also dissolves potassium double salts, borates, iodine, sulfates, magnesium salts and others, which are only partly soluble in the “strong mother solution”. After passing through the normal cooling-crystallization stage the new strong solutions are not sent back to the leaching vats to start a new cycle, but instead they are pumped to the Solar Evaporation System to be concentrated.

The Solar Evaporation System consist of a series of interconnected ponds where the solution moves from a first pond having the initial or lowest salt concentration up to the last pond with the highest salt concentration that can be attained through solar evaporation. After reaching the predetermined optimum salt concentration, the Natural Nitrate is recovered from the solutions by cooling and crystallization, and the final weak solution is sent to the vats to start a new leaching cycle of caliche ore.

There are two Solar Evaporation Plants, Coya Sur and Pampa Blanca, with 640,000 m<sup>2</sup> and 544,000 m<sup>2</sup> of pond evaporating surface, respectively. The average daily evaporation rate for the whole year at each Plant is 4.5 L m<sup>-2</sup> and 3 L m<sup>-2</sup>, respectively, this being another consequence of the permanent dry conditions in the Atacama Desert. The total volume of water evaporated from the solar ponds is over 1.5 million cubic meters per year, equivalent to more than one million kWh (kilowatt-hour) per year of solar energy captured by the system.



## PRO – listing Sodium Nitrate with annotation

The total energy input (mostly for rock crushing, ore conveying and evaporation) is 44GJ per ton N total renewable energy, its energy score is much more favourable than for synthetic N fertilizer that consumes on average 40GJ per ton N non-renewable energy (SQM, 2004; EFMA, 2002).

The Natural Nitrate is not only a natural product but the majority of the energy used in the extraction process is renewable solar energy.

### 2.5.3 *Ore reserves/sustainability*

Natural Chilean Nitrate is found principally in a large ore body nearly 800km long and 15 to 25kg wide. Small deposits occur in other areas, e.g. Africa, Australia, Mexico and China (IFDC & UNIDO, 1998. Fertilizer Manual, p. 239).

Mining has been taking place for over 100 years and according to the mining company, at current output it will last for several more centuries.

The sodium nitrate is mostly obtained as an inevitable by product from the production of iodine and potassium nitrate.

## 2.6 Mining and production process of other mineral organic fertilizers

### 2.6.1 *Potassium chloride and sodium chloride*

#### 2.6.1.1 *Mining*

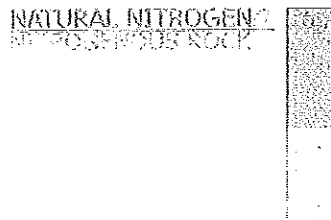
Potash ore is extracted from two major ore deposit types, deeply buried marine evaporite deposits that typically range from 400 meters to greater than 1000 meters below the surface, and surface brine deposits associated with saline water bodies such as the Dead Sea in the Middle East and the Great Salt Lake in North America.

Conventional mechanized underground mining operations are the most widely used method for the extraction of potash ore.

Surface brine deposits are exploited using solar evaporation ponds to concentrate and precipitate the potash. The evaporation ponds are extensive, with some operations covering in excess of 90 square kilometers of land area to produce around 8 million tons of potash ore per year (UNEP, 2001).

- **Underground mining**

Large amounts of potash are extracted from underground deposits of potassium minerals in the UK, Poland, Germany, Spain, France, Canada, USA, China and Russia by the conventional room and pillar mining method (Figure 25). An updated flowchart is included and shows the usage of the hot leaching and floatation process after the coarse and fine grinding (Figure 26).



**PRO – listing Sodium Nitrate with annotation**

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Page Count: 0  
Comment Tracking Number: 80bd57a4  
First Name: Gerald  
Last Name: Davis  
City: Arvin  
Country: United States  
State or Province: CA  
Organization Name: Citizen

## PRO – listing Sodium Nitrate with annotation

Dear NOSB members,

I send this note to explain in a few sentences the importance of continued sodium nitrate usage by organic growers. In light of recent developments in which the NOSB is being pushed to disallow this material based on international equivalency, I chose to provide this public comment to assist you to do the right thing. The right thing for you to do is to study the material and its current use pattern as annotated in the regulations and make your decision based on the merits of the material. Complete equivalency does not now exist between the various North American and European based organic regulations and will most likely stay that way, unless the U.S system is willing to capitulate and allow the Canadians and Europeans to use antibiotics in livestock and synthetic fertilizers in crops (materials that we staunchly prohibit).

In the realm of natural, organically allowed nitrogen fertilizers, there is no other material like sodium (Chilean) nitrate. All of the other organically allowed nitrogen (N) sources contain little or no nitrate, consisting mostly of nitrogen as a component of proteins/amino acids. Examples include fish and poultry processing wastes, blood meal, manures, green manures, etc. This difference is important in that most of our crop plants primarily utilize the nitrate form of N. Nitrate usage by plants is natural and totally necessary. (Excess nitrate loading of crops through excessive nitrogen fertilization practices is not good or natural.) During the warm growing season, various bacteria found in all soils use nitrogen based material as food, converting them in a stepwise process from proteins to ammonium-N then to nitrate forms of N. The rate of this biologically driven conversion process is temperature and soil moisture dependent. In warm, moist soils the conversion process is fairly rapid and plants that need the nitrate form of N can be well supplied using most any type of nitrogen source. At temperatures below 60° the bacterial activity (and N conversion rate) slows way down and practically ceases below 45°. All of the other organically approved N fertilizer sources will not convert to the nitrate form under these conditions and cool season vegetable crops that are able to grow to some extent at these temperatures will not grow without a nitrate N source. Much of the U.S. domestic winter and early spring production of organic vegetables is accomplished in 40-50° soil temperatures to supply the marketplace that asks for fresh produce 52 weeks a year. (See attachment "The Proper Use Chilean Nitrate in Organic Farming")

Proponents of prohibiting sodium nitrate almost universally ignore or minimize this fundamental importance of the material to growers who produce fresh organic vegetable crops during the season when the rest of the U.S. is icebound. Americans still like to eat fresh lettuce, spinach, and other fresh produce during the winter. Unless one wishes to supply that market from international production in the sub-tropics using increasingly wasteful long distance transportation, we need to keep our only natural nitrate fertilizer.

Included in this public comment, I have submitted topical segments of information on the various aspects of this material. I wish to present this information in a manner that is readable, without producing boredom or prompting you to close your mind. I hope you will gain an objective view of sodium nitrate gleaned from my 18 years of experience with this material. Used properly as currently annotated, it is a safe and valuable natural tool.

Sincerely,

Gerald Davis- Former NOSB member and three year Crops Committee Chairman

**PRO – listing Sodium Nitrate with annotation**

CC - Sodium Nitrate - Relinda Walker, Walker Farms

**Document ID:** AMS-NOP-11-0014-1797 **Document Type:** Public Submission

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**Comment Tracking Number:** 80c2040e

**First Name:** Relinda

**Last Name:** Walker

**City:** Sylvania

**Country:** United States

**State or Province:** GA

**Organization Name:** Walker Farms

The nitrogen management is difficult in the sandy soil of South Georgia. I use it very sparingly, but there are times when I need a push and I would like to be able to continue to use it.

**PRO – listing Sodium Nitrate with annotation**

CC - Sodium Nitrate - Dean Craine, AgriEnergy Resources

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**Comment Tracking Number:** 80c2033a

**First Name:** Dean

**Middle Name:** A.

**Last Name:** Craine

**City:** Princeton

**Country:** United States

**State or Province:** IL

**Organization Name:** AgriEnergy Resources

RE: Docket AMS-NOP-11-0014 Please consider our comments in the attached letter in support of relisting sodium nitrate WITH the annotation.

PRO – listing Sodium Nitrate with annotation

AgriEnergy Resources

21417 1920E St. Princeton, IL 61356 Phone 815/872-1190 Fax 815-872-1928



April 9, 2011

Ms. Patricia Atkins  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Room 2646-S0, Ag Stop 0268  
Washington, DC 20250-0268

Docket: AMS-NOP-11-0014  
RE: Crops Committee – Petitioned and Sunset Materials

To the members of the National Organic Standards Board (NOSB):

We respectfully request that you vote to relist sodium nitrate §205.602(g) WITH the annotation “unless use is restricted to no more than 20% of the crop’s total nitrogen requirement”.

The points for discussion have been made on both sides and I will not comment on those particulars, but I do wish to suggest that some of the conclusions drawn by the crop committee may be inaccurate.

An objection to sodium nitrate is that its use will lessen the need for growers to implement fertility building practices “like green manure and compost.” Because the use of sodium nitrate is restricted to supplying 20% of a crops need, the imperative to apply nitrogen enriching practices still exists. In some instances, such as corn production, the need for supplemental N increases with the use of sodium nitrate. This is because, as noted, that sodium nitrate is used early season to help get crops off to a quicker start. When a corn crop does get off to a better start, much more of its yield potential is maintained. Corn, unlike livestock or perennial crops, is not capable of compensatory growth. A slow starting corn plant can never make up that lost ground. Hence a corn crop that is vigorous early can, with moisture conditions permitting, have higher yield and consequently a higher demand for nutrients, particularly nitrogen.

Especially for annual crops, a fast start is critical for building sustainable soil systems. Too many times poor or mediocre crops miss the opportunity for the soil fertility increases that result from a more vigorous crop. Emerson Nafziger, University of Illinois professor and extension crop production specialist, made calculations on the amount of sugar and other low molecular weight carbon compounds that a healthy corn crop exudes into the soil during the growing season. On average he estimated that an Illinois corn crop will put 4-6 tons of carbon into the soil through its roots. The range is obviously dependent on the health and vigor of the stand.



## PRO – listing Sodium Nitrate with annotation

To maximize this input of carbon to the soil the crop must be vigorous, healthy, and have gotten off to a quick start. The use of sodium nitrate in organic corn production helps make this happen.

The crop committee report noted that there was little use of sodium nitrate outside the West Coast. Perhaps by volume Midwest use is comparatively small. Yet, as the preceding paragraph shows, its use in the Corn Belt and the East is valuable, and in corn production can even be crucial, to the profitability of that enterprise.

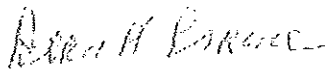
The report also expressed concern about sodium buildup through excessive use of sodium nitrate. Indeed this is a legitimate concern. Yet it could be easily dealt with by including language that disallowed its use when base saturation of Na exceeded a certain percentage, or by setting a maximum amount allowed on a soil test for each percentage point of CEC.

One point that may not have been covered in the discussions about sodium nitrate is the need of sodium as an essential element to certain crops. Marschner and many others have long recognized the requirement by plants of sodium to activate their C4 photosynthetic pathways. Plants like corn, sorghum, and Bermuda grass. Other plants like sugar beets, asparagus and barley just like sodium. Sugar beets, for example, yield much higher tonnages of sugar when they are not starved for sodium.

Yes, sodium nitrate production is a mining process and a finite resource. But crop removal too is a mining resource and what is removed will eventually need to be replaced.

Please allow organic growers to continue using sodium nitrate. Its judicious use helps soils and improves crops. Where it might damage the soil, further restrict its use. But please don't penalize Midwestern, Eastern, and Southeastern growers for the sins of the West Coast.

Respectfully,



Dean A. Craine  
General Manager  
AgriEnergy Resources  
815-872-1190

*Mark Egan, agronomist/owner, Black Prairie Agriculture, Shiner, TX, provided technical agronomic information for this letter.*

**PRO – listing Sodium Nitrate with annotation**

CC - Sodium nitrate - Scott Shriver, Shriver Farms, LLC

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Comment Tracking Number: 80c1f8a7

First Name: Scott

Last Name: Shriver

City: Jefferson

Country: United States

State or Province: IA

Organization Name: Shriver Farms, LLC

Natural sodium nitrate a good nitrogen source and good supplemental nitrogen source during years when manures fail. I've used it before and have had good results getting a quantitative yield boost out of it. It's a naturally-mined product, so why shouldn't it be organic?

CC - Sodium Nitrate - Richard Leverton, Harrison Survivors Share Trust

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Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c20327  
First Name: Richard  
Last Name: Leverton  
City: Ringoes  
Country: United States  
State or Province: NJ  
Organization Name: Harrison Survivors Share Trust

Under the old rules it is a mined product. I think it's a good idea.  
CC - Sodium Nitrate - Paul Maudlin, Excelsior Orchards

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**PRO – listing Sodium Nitrate with annotation**

Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time

Page Count: 0

Comment Tracking Number: 80c1e3c8

First Name: Paul

Last Name: Maudlin

City: Paonia

Country: United States

State or Province: CO

Organization Name: Excelsior Orchards

I live in an area where it is hard to get nitrogen in the soil, and I'm certified organic. I usually buy liquid fish, or blood meal or something like that, all certified organic, but they usually include natural sodium nitrate, or chilean nitrate. I'm certainly for keeping those additives legal as far as organic standards are concerned.

**PRO – listing Sodium Nitrate with annotation**

CC - SodiumNitrate - Dale Wedwick, DAle Wedwick

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Comment Tracking Number: 80c20473

First Name: Dale

Last Name: Wedwick

City: Coon Valley

Country: United States

State or Province: WI

Organization Name: DAle Wedwick

As long as it's a natural nitrate, it should be fine.

**PRO – listing Sodium Nitrate with annotation**

LC – Animal Welfare – HC – Nutrients - Bruce Rucker, Rucker Homestead

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**Comment Tracking Number:** 80c1eb18

**First Name:** Bruce

**Last Name:** Rucker

**City:** Mecca

**Country:** United States

**State or Province:** CA

**Organization Name:** Rucker Homestead

Nitrate is a very natural and known necessity for growing crops.

## PRO – listing Sodium Nitrate with annotation

General – Jeffrey Michael , J. Michael Orchards, Inc

**Document ID:** AMS-NOP-11-0014-2343**Document Type:** Public Submission

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Page Count: 0

Comment Tracking Number: 80c1f398

First Name: Jeffrey

Last Name: Michael

City: Cashmere

Country: United States

State or Province: WA

Organization Name: J. Michael Orchards, Inc

Soil temperature and timing is critical in growth. Need something that is fast acting. Natural nitrate is valuable.

**PRO – listing Sodium Nitrate with annotation**

CC - Materials - Katherine DiMatteo, Wolf, DiMatteo + Associates

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Comment Tracking Number: 80c20d2c

First Name: Katherine

Last Name: DiMatteo

City: New Castle

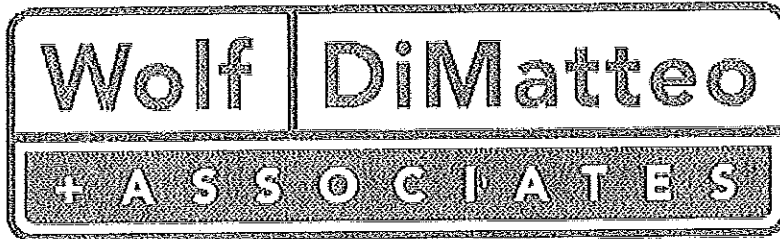
Country: United States

State or Province: VA

Organization Name: Wolf, DiMatteo + Associates

National Organic Standards Board c/o Ms. Patricia Atkins Docket No. AMS-NOP-11-0014; NOP 11-05  
Crops Committee Recommendations: Sunset Materials, Petitioned Materials, Corn Steep Liquor  
Thank you for your consideration of our comments which are submitted in two documents. Bill Wolf,  
Katherine DiMatteo, Sandy Mays Partners





## The Organic Specialists

April 10, 2011

To: National Organic Standards Board

c/o Ms. Patricia Atkins

NOSB, USDA-AMS-NOP

1400 Independence Ave. SW

Room 2646-So., Ag. Stop 0268

Washington, DC 20250-0260

RE: Docket Number AMS-NOP-11-0014; NOP-11-05

Crops Committee Recommendations: Sunset Materials

Dear Members of the National Organic Standards Board,

WD+A appreciates the opportunity to comment and for the open and transparent public process that allows for stakeholder participation and the exchange of ideas and information.

### **CROPS SUNSET MATERIALS:**

The NOSB Crops Committee has recommended the removal or added further restrictions on the use of these materials currently on the National List. Our overarching concerns with the decisions of the Crops Committee are:

1. Lack of evidence or substantiation provided by the Committee that alternatives to these materials exist and are effective.
2. Committee decisions were made not based on new Technical Reviews. Although the Committee had requested new reviews, they were either not provided prior to the decision or considered inadequate by the Committee.
3. If the substance is delisted the NOSB cannot opt to reconsider this substance in the event a new and adequate Technical Review indicates that it meets all the applicable materials criteria. A new petition process would have to be initiated.
4. The Committee is taking a reductionist approach to organic instead of supporting appropriate use of allowed materials in line with the myriad complexities of individual farm management within an approved organic system plan.
5. Removing allowed materials from the National List will not necessarily support better farm practices but more realistically will decrease quality and yield and reduce the number of acres in organic production.

WD+A does not support the following specific committee recommendations:

...

### **QUOTE**

Sodium Nitrate (Chilean Nitrate)

We understand and appreciate the political pressure to prohibit all uses of Sodium Nitrate in organic production. It may facilitate harmonization with other standards such as Canada and the EU, which prohibit this material. However, two important points need to be made here:

1. There is no evidence that this material is problematic or out of sync with organic farming with the limitations currently imposed that that Sodium Nitrate cannot be more than 20% of the crop's total nitrogen requirement.
2. Equivancy agreements are just that – recognition that the standards of two sovereign entities are equivalent and accomplish the same goals, but are not identical.

## PRO – listing Sodium Nitrate with annotation

So, in reviewing the use of Sodium Nitrate, a natural mined substance, in an ideal world, we should keep in mind the overall goals of organic agriculture and make the decision based on whether it is compatible with our principles, not someone else's perceptions.

### UNQUOTE

...

Document Subtype:	Comment
Status:	Posted
Received Date:	April 08 2011, at 12:00 AM Eastern Daylight Time
Date Posted:	April 11 2011, at 12:00 AM Eastern Daylight Time
Comment Start Date:	March 04 2011, at 12:00 AM Eastern Standard Time
Comment Due Date:	April 10 2011, at 12:00 AM Eastern Daylight Time
Page Count:	0
Comment Tracking Number:	80c1f835
First Name:	Richard
Last Name:	Priebe
City:	Kenyon
Country:	United States
State or Province:	MN
Organization Name:	Priebe's Organics

If natural sodium nitrate is natural, then I have no problems with it.

## PRO – listing Sodium Nitrate with annotation

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f419  
First Name: Brent  
Last Name: May  
City: Nyssa  
Country: United States  
State or Province: OR  
Organization Name: and Kay May Farm

We need all the things we can use to produce our crops.

Document Subtype: Comment  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f8c3  
First Name: Alice

**PRO – listing Sodium Nitrate with annotation**

Last Name: Royle  
City: Brownsville  
Country: United States  
State or Province: OR  
Organization Name: Union Point Custom Feed

As long it's not chemically treated, or any of the other things that are not allowed in organic agriculture, I don't see why a naturally-occurring substance wouldn't be suitable.

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f3d6  
First Name: Allen  
Last Name: Jarchow  
City: Harris  
Country: United States  
State or Province: MN  
Organization Name: Jarchow and Holstrom Farm

The OCIA has approved this.

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time

**PRO – listing Sodium Nitrate with annotation**

Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fd40  
First Name: Amy  
Last Name: Colby  
City: Maple  
Country: United States  
State or Province: WI  
Organization Name: Colby Dairy

Good that organic farmers can use it.

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c203de  
First Name: Art  
Last Name: Watkins  
City: Raleigh  
Country: United States  
State or Province: NC

## PRO – listing Sodium Nitrate with annotation

Organization Name: Tradewinds Coffee Co, Inc.

It's so hard to find inputs now for organic farming, so to eliminate another input is just ridiculous.

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c203c4  
First Name: Becky  
Last Name: Hamilton  
City: Hannibal  
Country: United States  
State or Province: MO  
Organization Name: General Mills Prnts - Hannibal

It's proven that it is effective.

Document Subtype: Comment  
Status: Posted  
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Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0

**PRO – listing Sodium Nitrate with annotation**

Comment Tracking Number: 80c1f3a8  
First Name: Benjamin  
Last Name: Stoltzfus  
City: Parkesburg  
Country: United States  
State or Province: PA  
Organization Name: Benjamin and Katie Stoltzfus

It's very good to enhance the growth of plants, and the sodium is a mineral and all natural.

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f3f8  
First Name: Brad  
Last Name: Johl  
City: Gridley  
Country: United States  
Organization Name: Sundial Orchards

If it is approved why would they take it away? Tough to buy organically. Need to reconsider taking it off unless it is doing more harm than good.

## PRO – listing Sodium Nitrate with annotation

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Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f8a9  
First Name: Brian  
Last Name: Bartelt  
City: Titonka  
Country: United States  
State or Province: IA  
Organization Name: Brian Bartelt

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fdb2  
First Name: Bruce  
Last Name: Ballard



## PRO – listing Sodium Nitrate with annotation

City: Saint Albans  
Country: United States  
State or Province: ME  
Organization Name: Bruce Ballard

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f3eb  
First Name: Bruce  
Last Name: Rolen  
City: Williams  
Country: United States  
State or Province: CA  
Organization Name: Bruce and Barbara Rolen

It is an important organic ingredient for agricultural production that is vital to our industry.

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time

## PRO – listing Sodium Nitrate with annotation

Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fd3e  
First Name: Carlton  
Last Name: Colmenares  
City: Houston  
Country: United States  
Organization Name: The Village Botanica, Inc.

Should be offered as an alternative source of nitrogen for crops grown under the national organic standards

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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f3d3  
First Name: Carol  
Last Name: Gillaspie  
City: Albia  
Country: United States  
State or Province: IA  
Organization Name: Gillaspie Farms

It's a necessary ingredient in crop production.

**PRO – listing Sodium Nitrate with annotation**

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fe27  
First Name: Charles  
Last Name: Brucato  
City: Lyons  
Country: United States  
State or Province: NY  
Organization Name: Circle B Organic Farm

As long as it doesn't have man made chemicals or petroleum in it I don't see any problem with it.

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fd37  
First Name: Charles

**PRO – listing Sodium Nitrate with annotation**

Last Name: Fowler  
City: Kelseyville  
Country: United States  
State or Province: CA  
Organization Name: Charles Fowler

It is a natural product

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c2008d  
First Name: Charles  
Last Name: Homan  
City: Spring Mills  
Country: United States  
State or Province: PA  
Organization Name: Lang Farm

It takes some of complications away from getting the nutrients out of the ground and takes some of financial pressure off crop failures

**PRO – listing Sodium Nitrate with annotation**

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f8c5  
First Name: Chris  
Last Name: Bartel  
City: Eugene  
Country: United States  
State or Province: OR  
Organization Name: Bartels Packing

It's being used currently in farming. I don't see any problem with it, so I would give my approval.

Document Subtype: Comment  
Status: Posted  
Received Date: April 07 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1eafa  
First Name: Craig  
Last Name: Anderson

## PRO – listing Sodium Nitrate with annotation

City: Burns  
Country: United States  
State or Province: WY  
Organization Name: Craig Anderson

I believe as long as it meets the requirements of the organic association that buys the organic crops that it is a viable product that can be successfully used.

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fdc4  
First Name: Craig  
Last Name: Corbett  
City: Grace  
Country: United States  
Organization Name: Corbett Farms

You going to have some form of nutrients to be able to stay in valuable business as along as it is not a synthetic nitrogen you got to be able to use something. If you ban that it will not work.

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 14 2011, at 12:00 AM Eastern Daylight Time

## PRO – listing Sodium Nitrate with annotation

Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1faf1  
First Name: Daniel  
Last Name: McMeen  
City: Blue Mounds  
Country: United States  
State or Province: WI  
Organization Name: Blue Horizon

Anything that helps organic farming, I'm usually in support of.

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 14 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f6df  
First Name: Darrell  
Last Name: Hagerty  
City: Lyden  
Country: United States  
State or Province: WA

## PRO – listing Sodium Nitrate with annotation

Organization Name: Darrell Hagerty

I believe to keep a good supply of organic products on the market for the consumer, we need to have all the available options we have, and the more we continue losing and the higher the costs get of available products, the worse off we are.

Document Subtype: Comment  
Status: Posted  
Received Date: April 07 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1eb19  
First Name: Darrell  
Last Name: Parks  
City: Manhattan  
Country: United States  
State or Province: KS  
Organization Name: Parks Farm

We need it because it is naturally occurring and an ok fertilizer.

Document Subtype: Comment  
Status: Posted  
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Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time



**PRO – listing Sodium Nitrate with annotation**

Page Count: 0  
Comment Tracking Number: 80c1fec2  
First Name: David  
Last Name: Dahnert  
City: Fort Atkinson  
Country: United States  
State or Province: WI  
Organization Name: David Dahnert

It is a tool that organic farmers need. It would be a lot harder to growth crops if it is taken away.

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fec6  
First Name: David  
Last Name: Hess  
City: Pleasant Hill  
Country: United States  
State or Province: OH  
Organization Name: Miami Valley Organic Farm

I believe it is a natural product and as long as it is used according to the nop standards I don't see any problem with it.

**PRO – listing Sodium Nitrate with annotation**

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Date Posted: April 08 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1e2dc  
First Name: David  
Last Name: King  
City: Abingdon  
Country: United States  
State or Province: VA  
Organization Name: River Valley Farm

Farmers need good options for organic production

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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c20410  
First Name: David  
Last Name: Nelson

**PRO – listing Sodium Nitrate with annotation**

City: Yuma  
Country: United States  
State or Province: AZ  
Organization Name: Datepac  
Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fe3a  
First Name: David  
Last Name: Troyer  
City: Shreve  
Country: United States  
State or Province: OH  
Organization Name: David Troyer

if it has been allowed for a long time then it should be allowed if it is a totally natural product

Document Subtype: Comment  
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Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time

**PRO – listing Sodium Nitrate with annotation**

Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1ee85  
First Name: David  
Last Name: Walsh  
City: Alexandria  
Country: United States  
State or Province: MN  
Organization Name: Walsh Farms

I think we are limited so much and nothing is wrong with it.

Document Subtype: Comment  
Status: Posted  
Received Date: April 07 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1eb07  
First Name: Dennis  
Last Name: Werlein  
City: Mondovi  
Country: United States  
State or Province: WI

## PRO – listing Sodium Nitrate with annotation

Organization Name: Werlein Farms

I would be in support of using it because it is proven to help in the production of corn to get good yields for corn. If this was disallowed it would really set us back as far as being able to grow nutritious crop.

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fec3  
First Name: Don  
Last Name: Jaworski  
City: Green Bay  
Country: United States  
State or Province: WI  
Organization Name: Jaworski Farm

Natural and synthetic products are part of our environment and we should be able to use them.

Document Subtype: Comment  
Status: Posted  
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Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time.

**PRO – listing Sodium Nitrate with annotation**

Page Count: 0  
Comment Tracking Number: 80c1ee08  
First Name: Donald  
Last Name: Hunziker  
City: Freeport  
Country: United States  
State or Province: IL  
Organization Name: D&M Farms

Nitrogen is hard to supply to the organic farmer.

Document Subtype: Comment  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c200c0  
First Name: Donald  
Last Name: Peck  
City: Tolland  
Country: United States  
State or Province: CT  
Organization Name: Lavender Hill Farm

I think it is useful for some organic farmers and should be allowed.

**PRO – listing Sodium Nitrate with annotation**

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Date Posted: April 13 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c20310  
First Name: Donna  
Last Name: Olson  
City: Paso Robles  
Country: United States  
State or Province: CA  
Organization Name: Nurses Pistachio Orchard

If that's a primary source where the product can be obtained, and it is organic, then it should be ok to use.

Document Subtype: Comment  
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Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c2033d  
First Name: Doug  
Last Name: Beretta

## PRO – listing Sodium Nitrate with annotation

City: Santa Rosa  
Country: United States  
State or Province: CA  
Organization Name: Beretta Dairy

I believe that there are organic farmers that are using it as a tool on their farms, and it's a very productive tool. If we continue to outlaw products such as these, then we're going to put organic farmers at a big disadvantage.

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Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fec1  
First Name: Douglas  
Last Name: Zillmer  
City: Algoma  
Country: United States  
State or Province: WI  
Organization Name: Zillmer Farm

I think they should allow natural products.

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time



## PRO – listing Sodium Nitrate with annotation

Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f41e  
First Name: Ed  
Last Name: Simon  
City: Merrill  
Country: United States  
State or Province: OR  
Organization Name: Ed Simon

We got to use it to keep our plants growing. If we keep cutting everything we won't have anything.

Document Subtype: Comment  
Status: Posted  
Received Date: April 06 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 08 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1d7cb  
First Name: Ellen  
Last Name: Wilson  
City: Palisade  
Country: United States  
State or Province: CO

## PRO – listing Sodium Nitrate with annotation

Organization Name: Palisade Peach Company

I think that it has been working fine all along and we should be able to continue to use it.

Document Subtype: Comment  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fd5c  
First Name: Elvin  
Last Name: Zeiset  
City: Thorp  
Country: United States  
State or Province: WI  
Organization Name: Oak Grove Dairy

Gives more options and better production.

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**PRO – listing Sodium Nitrate with annotation**

Page Count: 0  
Comment Tracking Number: 80c1fec5  
First Name: Ernesto  
Last Name: Amador  
City: Yuma  
Country: United States  
State or Province: AZ  
Organization Name: Yuma Organics

It comes from the ground and anything that comes from the ground is good

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c20344  
First Name: Eugene  
Last Name: Camozzi  
City: Petaluma  
Country: United States  
State or Province: CA  
Organization Name: Valley View Dairy

I feel that anything that is naturally-produced to help organic is an essential product

**PRO – listing Sodium Nitrate with annotation**

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1febf  
First Name: Faye  
Last Name: Smith  
City: Nicholls  
Country: United States  
State or Province: GA  
Organization Name: Ramshackle Hollow

I don't think that anything that is natural and not harmful to the soil should be able taken away from the farmers.

Document Subtype: Comment  
Status: Posted  
Received Date: April 07 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 08 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1e2b8  
First Name: Fred

**PRO – listing Sodium Nitrate with annotation**

Last Name: Leitz  
City: SODUS  
Country: United States  
State or Province: MI  
Organization Name: LEITZ FARMS LLC

Because it's another tool in the tool box that we need for organic production

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f367  
First Name: Gary  
Last Name: Gottschalk  
City: White Salmon  
Country: United States  
State or Province: WA  
Organization Name: Organic Orchards, Inc

It is a natural product

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time

## PRO – listing Sodium Nitrate with annotation

Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f3a4  
First Name: George  
Last Name: McNulty  
City: Reinholds  
Country: United States  
State or Province: PA  
Organization Name: Stone Hollow Farm

It comes in handy every now and then.

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fe0e  
First Name: George  
Last Name: Wright  
City: Hermon  
Country: United States  
State or Province: NY

## PRO – listing Sodium Nitrate with annotation

Organization Name: Wright Way Dairy

We have been using it for several years and we should continue to use it because it is totally natural

Document Subtype: Comment  
Status: Posted  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f345  
First Name: Greg  
Last Name: McPherson  
City: E Wenatchee  
Country: United States  
State or Province: WA  
Organization Name: McPherson Orchards

It is a natural substance

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0

**PRO – listing Sodium Nitrate with annotation**

Comment Tracking Number: 80c1f3f0  
First Name: Greg  
Last Name: Smith  
City: Colusa  
Country: United States  
State or Province: CA  
Organization Name: Colusa Milling Company

The farmers should be able to use because in organic farming you don't have many tools

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Status: Posted  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1ee93  
First Name: Hans  
Last Name: Wolfisberg  
City: Everson  
Country: United States  
State or Province: WA  
Organization Name: Edelweiss Dairy, Inc.

It is a natural product that won't hurt the environment.



## PRO – listing Sodium Nitrate with annotation

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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f34a  
First Name: Harris  
Last Name: Brooks  
City: Royal City  
Country: United States  
State or Province: WA  
Organization Name: Brooks Family Orchard

It is a natural element not a synthetic element.

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c200b3  
First Name: Helena  
Last Name: Powell

**PRO – listing Sodium Nitrate with annotation**

City: Soquel  
Country: United States  
State or Province: CA  
Organization Name: Shaman Chocolates

It is important to let organic farmers have good organic tools and not push them into going non-organic

Document Subtype: Comment  
Status: Posted  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c204b3  
First Name: Hendrik  
Last Name: Feenstra  
City: Orland  
Country: United States  
State or Province: CA  
Organization Name: Riverview Orchard

I think it's a valuable tool for farmers to use, and there aren't many substitutes for it.

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 13 2011, at 12:00 AM Eastern Daylight Time

## PRO – listing Sodium Nitrate with annotation

Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c204a3  
First Name: Ivan  
Last Name: Yoder  
City: Reedsville  
Country: United States  
State or Province: WI  
Organization Name: Ivan Yoder

It's good for the soil, and it's also good for the cattle.

Document Subtype: Comment  
Status: Posted  
Received Date: April 07 2011, at 12:00 AM Eastern Daylight Time  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1eb11  
First Name: Jack  
Last Name: Boatman  
City: Pahrump  
Country: United States  
Organization Name: Jack in the Green Stock

If it's natural it should be allowed. I used mined sulfur and don't see a problem with it.

**PRO – listing Sodium Nitrate with annotation**

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f3ac  
First Name: James  
Last Name: Devries  
City: Ravenna  
Country: United States  
State or Province: MI  
Organization Name: Turtle Island

This is a helpful, useful tool.

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c20481  
First Name: James  
Last Name: Larson

## PRO – listing Sodium Nitrate with annotation

City: Postville  
Country: United States  
State or Province: IA  
Organization Name: James Larson

It is natural, and a lot of farmers depend on it.

Document ID: AMS-NOP-11-0014-2360 Document Type: Public Submission

This is comment on Notice: Meetings: National Organic Standards Board

Docket ID:

AMS-NOP-11-0014

Hide Details

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f3d2  
First Name: Jason  
Last Name: Wells  
City: Milton  
Country: United States  
Organization Name: Wells Farm

## PRO – listing Sodium Nitrate with annotation

I was an organic farmer and had two years of crop failure on corn. We need to keep this option open because the reason we didn't have good corn was because we had no nitrogen source available.

Document ID: AMS-NOP-11-0014-2044 Document Type: Public Submission

This is comment on Notice: Meetings: National Organic Standards Board

Docket ID:

AMS-NOP-11-0014

### Hide Details

Document Subtype:	Comment
Status:	Posted
Received Date:	April 08 2011, at 12:00 AM Eastern Daylight Time
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Comment Start Date:	March 04 2011, at 12:00 AM Eastern Standard Time
Comment Due Date:	April 10 2011, at 12:00 AM Eastern Daylight Time
Page Count:	0
Comment Tracking Number:	80c1ef0b
First Name:	Joe
Last Name:	Czajkowski
City:	Hadley
Country:	United States
State or Province:	MA
Organization Name:	Lakeside Organic

It is a very helpful product. Sometimes I need to add a little nitrogen to work quickly and it does. I use it from time to time and has been a big help when I really need it.

Document ID: AMS-NOP-11-0014-2938 Document Type: Public Submission

## PRO – listing Sodium Nitrate with annotation

This is comment on Notice: Meetings: National Organic Standards Board

Docket ID:

AMS-NOP-11-0014

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Document Subtype:	Comment
Status:	Posted
Received Date:	April 09 2011, at 12:00 AM Eastern Daylight Time
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Comment Start Date:	March 04 2011, at 12:00 AM Eastern Standard Time
Comment Due Date:	April 10 2011, at 12:00 AM Eastern Daylight Time
Page Count:	0
Comment Tracking Number:	80c202c1
First Name:	Joel
Last Name:	Goede
City:	Genoa
Country:	United States
State or Province:	WI
Organization Name:	Goede Acres, LLC

I believe that if your soil starts to show deficiencies in the ground, you should be able to add substances if they are an actual product.

Document ID: AMS-NOP-11-0014-2357 Document Type: Public Submission

This is comment on Notice: Meetings: National Organic Standards Board

Docket ID:

AMS-NOP-11-0014

## PRO – listing Sodium Nitrate with annotation

Hide Details

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f3d0  
First Name: John  
Last Name: Accornero  
City: Pocahontas  
Country: United States  
State or Province: IL  
Organization Name: John Accornero Farm

It's a valuable tool for the organic farmer.

Document ID: AMS-NOP-11-0014-1408 Document Type: Public Submission

This is comment on Notice: Meetings: National Organic Standards Board

Docket ID:

AMS-NOP-11-0014

Hide Details

Document Subtype: Comment  
Status: Posted  
Received Date: April 07 2011, at 12:00 AM Eastern Daylight Time



## PRO – listing Sodium Nitrate with annotation

Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1eb13  
First Name: John  
Last Name: Baxter  
City: Saguache  
Country: United States  
Organization Name: Cochetopa Land and Cattle

It's a natural product we need for organic farming.

Document ID: AMS-NOP-11-0014-1491 Document Type: Public Submission

This is comment on Notice: Meetings: National Organic Standards Board

Docket ID:

AMS-NOP-11-0014

Hide Details

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fd61

**PRO – listing Sodium Nitrate with annotation**

First Name: John  
Last Name: Debauch  
City: Cecil  
Country: United States  
State or Province: WI  
Organization Name: D-B Hills

We need it for our corn starter it is what we use it for.

Document ID: AMS-NOP-11-0014-2332 Document Type: Public Submission

This is comment on Notice: Meetings: National Organic Standards Board

Docket ID:

AMS-NOP-11-0014

Hide Details

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f360  
First Name: John  
Last Name: Toevs  
City: Quincy  
Country: United States

## PRO – listing Sodium Nitrate with annotation

State or Province: WA  
Organization Name: T & T Orchards

It is a natural product that can be used in limited amounts.

Document ID: AMS-NOP-11-0014-2429 Document Type: Public Submission

This is comment on Notice: Meetings: National Organic Standards Board

Docket ID:  
AMS-NOP-11-0014

### Hide Details

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 13 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c2049d  
First Name: Joseph  
Last Name: Ginet  
City: Williams  
Country: United States  
State or Province: OR  
Organization Name: Plaisance Ranch

If it's natural, it must be organic.

## PRO – listing Sodium Nitrate with annotation

Document ID: AMS-NOP-11-0014-1772 Document Type: Public Submission

This is comment on [Notice](#): Meetings: National Organic Standards Board

Docket ID:

AMS-NOP-11-0014

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Document Subtype:	Comment
Status:	Posted
Received Date:	April 09 2011, at 12:00 AM Eastern Daylight Time
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Comment Start Date:	March 04 2011, at 12:00 AM Eastern Standard Time
Comment Due Date:	April 10 2011, at 12:00 AM Eastern Daylight Time
Page Count:	0
Comment Tracking Number:	80c203f4
First Name:	Joseph
Last Name:	Schultes
City:	Dedham
Country:	United States
State or Province:	IA
Organization Name:	Joseph Schultes' Farm

What else would they be using if they didn't use that?

Document ID: AMS-NOP-11-0014-2948 Document Type: Public Submission

This is comment on [Notice](#): Meetings: National Organic Standards Board

Docket ID:

AMS-NOP-11-0014

## PRO – listing Sodium Nitrate with annotation

Hide Details

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c202cd  
First Name: Joshua  
Last Name: Wolfe  
City: Cochrane  
Country: United States  
State or Province: WI  
Organization Name: Joshua Wolfe

If it's a natural-mined substance I think it should be allowed.

Document ID: AMS-NOP-11-0014-3338 Document Type: Public Submission

This is comment on Notice: Meetings: National Organic Standards Board

Docket ID:

AMS-NOP-11-0014

Hide Details

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time

**PRO – listing Sodium Nitrate with annotation**

Date Posted: April 14 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fad0  
First Name: Judith  
Last Name: Eness  
City: La Farge  
Country: United States  
Organization Name: Rustic Ranch

Anything natural is good, and its perfect for the ground.

Document ID: AMS-NOP-11-0014-1240 Document Type: Public Submission

This is comment on Notice: Meetings: National Organic Standards Board

Docket ID:

AMS-NOP-11-0014

Hide Details

Document Subtype: Comment  
Status: Posted  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1e4a3

**PRO – listing Sodium Nitrate with annotation**

First Name: Keith  
Last Name: Babler  
City: Cascade  
Country: United States  
State or Province: WI  
Organization Name: Cascade Cheese Company

I don't think there is anything bad about it at all.

Document ID: AMS-NOP-11-0014-2207 Document Type: Public Submission

This is comment on Notice: Meetings: National Organic Standards Board

Docket ID:  
AMS-NOP-11-0014

Hide Details

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c20099  
First Name: Kenneth  
Last Name: Krapf  
City: Manhattan  
Country: United States

## PRO – listing Sodium Nitrate with annotation

State or Province: IL

Organization Name: Fuller Krapf Farms

It is another tool that we need.

Document ID: AMS-NOP-11-0014-2615 Document Type: Public Submission

This is comment on Notice: Meetings: National Organic Standards Board

Docket ID:

AMS-NOP-11-0014

Hide Details

Document Subtype: Comment

Status: Posted

Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time

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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time

Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time

Page Count: 0

Comment Tracking Number: 80c200f4

First Name: Kevin

Last Name: Swanson

City: Lamar

Country: United States

Organization Name: Colorado Mills, LLC

It is all natural.



## PRO – listing Sodium Nitrate with annotation

Document ID: AMS-NOP-11-0014-1747 Document Type: Public Submission

This is comment on Notice: Meetings: National Organic Standards Board

Docket ID:

AMS-NOP-11-0014

### Hide Details

Document Subtype:	Comment
Status:	Posted
Received Date:	April 09 2011, at 12:00 AM Eastern Daylight Time
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Comment Start Date:	March 04 2011, at 12:00 AM Eastern Standard Time
Comment Due Date:	April 10 2011, at 12:00 AM Eastern Daylight Time
Page Count:	0
Comment Tracking Number:	80c203d9
First Name:	Kim
Last Name:	Rasmussen
City:	Preston
Country:	United States
State or Province:	ID
Organization Name:	W-7 Organic Beef

If it's natural, I think it's okay to be used.

## PRO – listing Sodium Nitrate with annotation

Document ID: AMS-NOP-11-0014-1121 Document Type: Public Submission

This is comment on [Notice: Meetings: National Organic Standards Board](#)

Docket ID:

AMS-NOP-11-0014

Hide Details

Document Subtype:	Comment
Status:	Posted
Received Date:	April 07 2011, at 12:00 AM Eastern Daylight Time
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Comment Start Date:	March 04 2011, at 12:00 AM Eastern Standard Time
Comment Due Date:	April 10 2011, at 12:00 AM Eastern Daylight Time
Page Count:	0
Comment Tracking Number:	80c1e309
First Name:	Lance
Last Name:	Estevez
City:	Pomfret
Country:	United States
State or Province:	MD
Organization Name:	Lance Estevez

There hasn't been a problem for many years. It is allowed in other countries so why not here.

Document ID: AMS-NOP-11-0014-1363 Document Type: Public Submission

This is comment on [Notice: Meetings: National Organic Standards Board](#)

Docket ID:

AMS-NOP-11-0014

## PRO – listing Sodium Nitrate with annotation

Hide Details

Document Subtype: Comment  
Status: Posted  
Received Date: April 07 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1edff  
First Name: Larry  
Last Name: Hendrix  
City: Buckingham  
Country: United States  
State or Province: IL  
Organization Name: Larry Hendrix

I believe the NOSB should provided continued use of Sodium Nitrate. It is a natural product necessary for production.

Document ID: AMS-NOP-11-0014-3157 Document Type: Public Submission

This is comment on [Notice](#): Meetings: National Organic Standards Board

Docket ID:

AMS-NOP-11-0014

Hide Details

Document Subtype: Comment  
Status: Posted

## PRO – listing Sodium Nitrate with annotation

Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c20496  
First Name: Leonard  
Last Name: Brubaker  
City: Withee  
Country: United States  
State or Province: WI  
Organization Name: Leonard Brubaker

It's a good nitrogen source.

Document ID: AMS-NOP-11-0014-1513 Document Type: Public Submission

This is comment on Notice: Meetings: National Organic Standards Board

Docket ID:

AMS-NOP-11-0014

Hide Details

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time

**PRO – listing Sodium Nitrate with annotation**

Page Count: 0  
Comment Tracking Number: 80c1fdc2  
First Name: Leroy  
Last Name: Robinson  
City: Albion  
Country: United States  
State or Province: ID  
Organization Name: Leroy Robinson

It is for organic farming

Document ID: AMS-NOP-11-0014-1560 Document Type: Public Submission

This is comment on Notice: Meetings: National Organic Standards Board .

Docket ID:

AMS-NOP-11-0014

Hide Details

Document Subtype: Comment  
Status: Posted  
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Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f8c6  
First Name: Lorne  
Last Name: Miller

**PRO – listing Sodium Nitrate with annotation**

City: Mifflinburg  
Country: United States  
State or Province: PA  
Organization Name: Lorne Miller

If it's natural and organic, it should be allowed to be used.

Document ID: AMS-NOP-11-0014-1512 Document Type: Public Submission

This is comment on Notice: Meetings: National Organic Standards Board

Docket ID:  
AMS-NOP-11-0014

Hide Details

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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fdc0  
First Name: Luke  
Last Name: Ahmed  
City: Bradford  
Country: United States  
State or Province: ME  
Organization Name: Leelynn Farm

## PRO – listing Sodium Nitrate with annotation

I see no reason to ban something that we truly need. We don't have a lot of products that we can use that is part of the problem. I don't find any ill effects of using this product what so ever.

Document ID: AMS-NOP-11-0014-1789 Document Type: Public Submission

This is comment on Notice: Meetings: National Organic Standards Board

Docket ID:

AMS-NOP-11-0014

Hide Details

Document Subtype:	Comment
Status:	Posted
Received Date:	April 09 2011, at 12:00 AM Eastern Daylight Time
Date Posted:	April 11 2011, at 12:00 AM Eastern Daylight Time
Comment Start Date:	March 04 2011, at 12:00 AM Eastern Standard Time
Comment Due Date:	April 10 2011, at 12:00 AM Eastern Daylight Time
Page Count:	0
Comment Tracking Number:	80c20402
First Name:	Luke
Last Name:	Rhodes
City:	Newberry
Country:	United States
State or Province:	IN
Organization Name:	Rhodes Family Farm

We don't have many other options.

**PRO – listing Sodium Nitrate with annotation**

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1effc  
First Name: Lydia  
Last Name: Poulsen  
City: Snowville  
Country: United States  
State or Province: UT  
Organization Name: Poulsen Farms

It's one of the inputs that we can use that we need to use and banning it would make no sense.

Document ID: AMS-NOP-11-0014-1407 Document Type: Public Submission

This is comment on Notice: Meetings: National Organic Standards Board

Docket ID:

AMS-NOP-11-0014

Hide Details

Document Subtype: Comment  
Status: Posted  
Received Date: April 07 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time



## PRO – listing Sodium Nitrate with annotation

Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1eb12  
First Name: Lynn  
Last Name: Edelman  
City: Sabetha  
Country: United States  
Organization Name: Edelman Farm

It is necessary in certain areas where we are low in nitrogen, but you should rotate when you use it.

Document ID: AMS-NOP-11-0014-1243 Document Type: Public Submission

This is comment on Notice: Meetings: National Organic Standards Board

Docket ID:

AMS-NOP-11-0014

Hide Details

Document Subtype: Comment  
Status: Posted  
Received Date: April 07 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 08 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1e4aa  
First Name: Mark

**PRO – listing Sodium Nitrate with annotation**

Last Name: Wickenhauser  
City: Cologne  
Country: United States  
State or Province: MN  
Organization Name: Wicmar Dairy

It's not clear to me why we would want to discontinue this product.

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 13 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c20491  
First Name: Marlin  
Last Name: Newswanger  
City: Shelby  
Country: United States  
State or Province: OH  
Organization Name: Green Lawn Dairy

It's a natural product. They shouldn't disallow natural products.

Document Subtype: Comment  
Status: Posted

## PRO – listing Sodium Nitrate with annotation

Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 13 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c202c5  
First Name: Mary  
Last Name: Droessler  
City: Cuba City  
Country: United States  
State or Province: WI  
Organization Name: Green Acre Farm

If it's natural and organic, then I support it.

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c204b4  
First Name: Maynard  
Last Name: Miller  
City: Kalona  
Country: United States

**PRO – listing Sodium Nitrate with annotation**

State or Province: IA  
Organization Name: Maynard Miller

I see no reason not to use it.

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 13 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c2030b  
First Name: Michael  
Last Name: Dodge  
City: Valley Center  
Country: United States  
State or Province: CA  
Organization Name: Buster's Grove

I feel that it's a good alternative to some other products out there, and I feel that we should be able to use this product.

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time

**PRO – listing Sodium Nitrate with annotation**

Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f3f5  
First Name: Michael  
Last Name: Fowler  
City: Kelseyville  
Country: United States  
State or Province: CA  
Organization Name: Top of Konocti Farms

It's a natural product out of the earth.

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c200b8  
First Name: Michael  
Last Name: Sanft  
City: Spring Valley  
Country: United States  
State or Province: NY  
Organization Name: Generation Tea

## PRO – listing Sodium Nitrate with annotation

It is an important fertilizer that they need to use.

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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fec4  
First Name: Mike  
Last Name: Stephani  
City: De Pere  
Country: United States  
State or Province: WI  
Organization Name: Stephani Farm

We are able to use it now and it is not causing any problems. I would like to continue to use the products I am using.

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Status: Posted  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time

**PRO – listing Sodium Nitrate with annotation**

Page Count: 0  
Comment Tracking Number: 80c203e1  
First Name: Mike  
Last Name: Wargocki  
City: Centennial  
Country: United States  
State or Province: CO  
Organization Name: Penford Food Ingredients

I don't see any reason why a natural product would not be allowed.

Document Subtype: Comment  
Status: Posted  
Received Date: April 07 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1ee98  
First Name: Mike  
Last Name: Youngquist  
City: Mount Vernon  
Country: United States  
State or Province: WA  
Organization Name: Mike & Jean's Berry Farm

It is a natural product. Great for plant growth.

**PRO – listing Sodium Nitrate with annotation**

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Status: Posted  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fd19  
First Name: Monte  
Last Name: Black  
City: Kelseyville  
Country: United States  
State or Province: CA  
Organization Name: Ancient Lake Gardens

If in truly natural form and being mined in an environmental friendly manner it should be continued mined.

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Status: Posted  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
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Page Count: 0  
Comment Tracking Number: 80c1ef18  
First Name: Nathan  
Last Name: Brewster



**PRO – listing Sodium Nitrate with annotation**

City: Van Horn  
Country: United States  
State or Province: TX  
Organization Name: Nathan Lane Brewster

It is totally organic.

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c203f2  
First Name: Neil  
Last Name: Arnold  
City: Caro  
Country: United States  
State or Province: MI  
Organization Name: Arnold Farms

It's one of the tools we can use for fertilizer in our production of organic crops.

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time

## PRO – listing Sodium Nitrate with annotation

Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f3d4  
First Name: Pamela  
Last Name: McSweeney  
City: Westerlo  
Country: United States  
State or Province: NY  
Organization Name: Eight Mile Creek Farm

It is a valuable input that organic farms can use.

Document Subtype: Comment  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c2007a  
First Name: Pat  
Last Name: Boughan  
City: Clifford  
Country: United States  
State or Province: MI

## PRO – listing Sodium Nitrate with annotation

Organization Name: Boughan Farms

It has naturally mined elements and it is a valuable nutrient for us.

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Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f3fb  
First Name: Paul  
Last Name: Estabrook  
City: Natural Bridge  
Country: United States  
State or Province: VA  
Organization Name: Virginia Gold Orchard

Is a natural product. Disagree with outlawing it.

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Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0

**PRO – listing Sodium Nitrate with annotation**

Comment Tracking Number: 80c204ae  
First Name: Maurice  
Last Name: Penna  
City: Orlando  
Country: United States  
State or Province: CA  
Organization Name: Debeccaris, LTD., DB M&CP FRMS

It's none of the government's business!

Document Subtype: Comment  
Status: Posted  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c20492  
First Name: Ray  
Last Name: Yokiel  
City: Wells  
Country: United States  
State or Province: MN  
Organization Name: Ray Yokiel

I use it on crops that are short on nitrogen, and it seems to work out quite well.

Document Subtype: Comment

**PRO – listing Sodium Nitrate with annotation**

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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fda7  
First Name: Raymond  
Last Name: Coffren  
City: Salem TWP  
Country: United States  
State or Province: ME  
Organization Name: Coffren's Farm

I believe we should continue to use because we have been using it and there really is no reason to change it. They have not proven in any way that it is not an organic substance

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Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f3a6  
First Name: Richard  
Last Name: Cuillier

**PRO – listing Sodium Nitrate with annotation**

City: Wapato  
Country: United States  
State or Province: WA  
Organization Name: Homestake Farms, LLC

It is a product that we all need to use

Document Subtype: Comment  
Status: Posted  
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Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c203d3  
First Name: Richard  
Last Name: DeMaïne  
City: Smithfield  
Country: United States  
State or Province: RI  
Organization Name: Sweet Farm

It's a natural product, and it's essential to providing natural nutrients to farm grown products.

Document Subtype: Comment  
Status: Posted  
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## PRO – listing Sodium Nitrate with annotation

Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fe26  
First Name: Richard  
Last Name: Pedersen  
City: Seneca Castle  
Country: United States  
State or Province: NY  
Organization Name: Pedersen Farms, Inc

In some of the shorten season higher intensity vegetable crops it is valuable to have to maintain economic yields.

Document Subtype: Comment  
Status: Posted  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1eb14  
First Name: Rick  
Last Name: Collett  
City: Sparks  
Country: United States  
State or Province: NV

## PRO – listing Sodium Nitrate with annotation

Organization Name: West-Pack Industries

I've done quite a bit of research on organic compounds that can be applied to soils. We have worked in Africa and developed a line of natural bio-stimulants to increase nitrogen content. We want to make sure these compounds can be used in organic farming.

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Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1febe  
First Name: Rita  
Last Name: Spencer  
City: Nenana  
Country: United States  
State or Province: AR  
Organization Name: Rita Spencer

It is organic and natural. They need to be able to use it as long as it is natural.

Document Subtype: Comment  
Status: Posted  
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**PRO – listing Sodium Nitrate with annotation**

Page Count: 0  
Comment Tracking Number: 80c20498  
First Name: Robert  
Last Name: Berger  
City: Spencer  
Country: United States  
State or Province: WI  
Organization Name: TI BO Organic Dairy

It's needed by the organic farmers to produce the crops we need. If they keep taking everything away, we won't have anything left.

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Page Count: 0  
Comment Tracking Number: 80c1e1b9  
First Name: Robert  
Last Name: Churchill  
City: Hollister  
Country: United States  
State or Province: CA  
Organization Name: Robert Churchill Farms

We don't use it in the orchard, but if the guys in the row crops need it they should be able to use it

**PRO – listing Sodium Nitrate with annotation**

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Page Count: 0  
Comment Tracking Number: 80c204bc  
First Name: Robert  
Last Name: Eberly  
City: Stevens  
Country: United States  
State or Province: PA  
Organization Name: Eberly Poultry, Inc

It's a necessary product that growers need to use right now.

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
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Page Count: 0  
Comment Tracking Number: 80c1fd98  
First Name: Robert  
Last Name: Herrin

## PRO – listing Sodium Nitrate with annotation

City: Canaan  
Country: United States  
State or Province: AL  
Organization Name: Herrin Farm

I believe is valuable tool for us and it shouldn't be taking away.

Document Subtype: Comment  
Status: Posted  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fd4e  
First Name: Robert  
Last Name: Keatley  
City: River Falls  
Country: United States  
State or Province: WI  
Organization Name: Arrow Dale Farm

We don't have too many options. When we eliminate things we can already use it makes it difficult.

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Status: Posted  
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**PRO – listing Sodium Nitrate with annotation**

Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1eb05  
First Name: Robert  
Last Name: Klie  
City: St. Francis  
Country: United States  
Organization Name: Robert Klie

I think we need to keep as opposed to banning everything they want to do.

Document Subtype: Comment  
Status: Posted  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fd39  
First Name: Robert  
Last Name: Niles  
City: Loleta  
Country: United States  
State or Province: CA  
Organization Name: Niles Ranch (HCA)

We should have the right to use it if we want to. It's a good tool.

**PRO – listing Sodium Nitrate with annotation**

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Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c203cf  
First Name: Robert  
Last Name: Perry  
City: Essex  
Country: United States  
State or Province: NY  
Organization Name: Adironadack Organic Grains

If it's been used in the past, it should be able to continue to be used in organics.

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Page Count: 0  
Comment Tracking Number: 80c1fe0d  
First Name: Robert

## PRO – listing Sodium Nitrate with annotation

Last Name: Zufall  
City: Lisbon  
Country: United States  
State or Province: NY  
Organization Name: Robert Zufall

It should be continued because it is a good product. It is used worldwide and it should be used in this country as well

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Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c202a1  
First Name: Roger  
Last Name: Ford  
City: Owego  
Country: United States  
State or Province: NY  
Organization Name: Ford Farm

I think it's important for the production.

Document Subtype: Comment  
Status: Posted  
Received Date: April 07 2011, at 12:00 AM Eastern Daylight Time

## PRO – listing Sodium Nitrate with annotation

Date Posted: April 08 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1e307  
First Name: Ron  
Last Name: Lodato  
City: Blackwood  
Country: United States  
State or Province: NJ  
Organization Name: Caesar's Pasta Products

I believe that we have to do everything to support organic farming in our country.

Document Subtype: Comment  
Status: Posted  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fe23  
First Name: Ron  
Last Name: Simons  
City: Penn Yann  
Country: United States  
State or Province: NY

## PRO – listing Sodium Nitrate with annotation

Organization Name: Ron Simons

As long it is natural I don't see a reason why it shouldn't be used.

Document Subtype: Comment

Status: Posted

Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time

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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time

Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time

Page Count: 0

Comment Tracking Number: 80c1ef1a

First Name: Scott

Last Name: Johnson

City: Monticello

Country: United States

State or Province: UT

Organization Name: Scott Johnson

Influential in developing quality crops that help sustain human life.

Document Subtype: Comment

Status: Posted

Received Date: April 07 2011, at 12:00 AM Eastern Daylight Time

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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time

Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time

Page Count: 0



**PRO – listing Sodium Nitrate with annotation**

Comment Tracking Number: 80c1ee75  
First Name: Stanley  
Last Name: Glaser  
City: Miami  
Country: United States  
State or Province: FL  
Organization Name: Glaser Organic Farms

Yes I agree that they should be used

Document Subtype: Comment  
Status: Posted  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0

Comment Tracking Number: 80c1ef16  
First Name: Steven  
Last Name: Knapke  
City: Fort Recovery  
Country: United States  
State or Province: OH  
Organization Name: Knapke Dairy

It's a natural product. Without altering it should be allowed. It is a valuable tool. Nitrogen is difficult to obtain and is a good organic source.

Document Subtype: Comment  
Status: Posted

**PRO – listing Sodium Nitrate with annotation**

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Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f634  
First Name: William Tate  
Last Name: Hayman  
City: Leon  
Country: United States  
State or Province: WV  
Organization Name: Hayman Homestead

If we don't allow the continued use of natural sodium nitrate, it will hurt those organic farmers out there that rely on that to produce their crops and livestock.

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 13 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c20309  
First Name: Teresa  
Last Name: McKeown  
City: Valley Center

## PRO – listing Sodium Nitrate with annotation

Country: United States  
State or Province: CA  
Organization Name: McKeown Ranch

If it's a naturally-occurring substance that is not in any way harmful to the product that is being produced, I don't see why it should not be permitted to continue.

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fd9b  
First Name: Thayden  
Last Name: Farrington  
City: Jay  
Country: United States  
State or Province: ME  
Organization Name: Thayden Farm Inc

Anything natural and organic should be okay.

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 13 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time

## PRO – listing Sodium Nitrate with annotation

Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time

Page Count: 0

Comment Tracking Number: 80c202a8

First Name: Tim

Last Name: Elliott

City: Marathon

Country: United States

State or Province: NY

Organization Name: Eltimar Farm

It's important that we're able to use those products to improve the fertility of our soils. Since we're organic we're limited on what we can use, and this is one important product that we need to be able to continue to keep using.

Document Subtype: Comment

Status: Posted

Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time

Date Posted: April 13 2011, at 12:00 AM Eastern Daylight Time

Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time

Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time

Page Count: 0

Comment Tracking Number: 80c204be

First Name: Tim

Last Name: Stark

City: Lakeport

Country: United States

State or Province: CA

Organization Name: Stark Farms

## PRO – listing Sodium Nitrate with annotation

There is too much government regulation on farmers anyway. It's just another regulation we have to put up with, and our choices are limited as they are.

Document Subtype: Comment  
Status: Posted  
Received Date: April 07 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1ee00  
First Name: Timothy  
Last Name: Derstine  
City: Mapleton Depot  
Country: United States  
State or Province: PA  
Organization Name: Hares Valley Growers

It is a natural resource and I know some companies put it in their mix that we use. Because it is a natural resource I believe it should be used.

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c200c5

**PRO – listing Sodium Nitrate with annotation**

First Name: Timothy  
Last Name: Ford  
City: Lake Wales  
Country: United States  
State or Province: FL  
Organization Name: T & E Farm, Inc

It is awesome in fertilizer.

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c202cb

First Name: Timothy  
Last Name: Parker  
City: La Farge  
Country: United States  
State or Province: WI  
Organization Name: Parker Farms

We need all we can get.

Document Subtype: Comment  
Status: Posted

## PRO – listing Sodium Nitrate with annotation

Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c202f8  
First Name: Titus  
Last Name: Nolt  
City: Richland  
Country: United States  
State or Province: PA  
Organization Name: Titus Nolt

If you need it and use it, then I support it

Document Subtype: Comment  
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Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fd0a  
First Name: Tod  
Last Name: Patten  
City: Pope Valley  
Country: United States  
State or Province: CA

**PRO – listing Sodium Nitrate with annotation**

Organization Name: Eakle Farms

Because it is natural and its works.

Document Subtype: Comment

Status: Posted

Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time

Date Posted: April 11 2011, at 12:00 AM Eastern Daylight Time

Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time

Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time

Page Count: 0

Comment Tracking Number: 80c1fe24

First Name: Todd

Last Name: Brown

City: Cato

Country: United States

State or Province: NY

Organization Name: Conquest Organic Farms

It is a natural product why shouldn't they be able to use it.

Document Subtype: Comment

Status: Posted

Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time

Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time

Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time

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Page Count: 0



## PRO – listing Sodium Nitrate with annotation

Comment Tracking Number: 80c1f311  
First Name: Tom  
Last Name: Schneider  
City: Taopi  
Country: United States  
State or Province: MN  
Organization Name: TCJ Farm

It is a very valuable tool for organic farmers to get a source of nutrients. It has come to a certain time that we need the product.

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Status: Posted  
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Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1fec0  
First Name: Tom  
Last Name: Steinbach  
City: Mayville  
Country: United States  
State or Province: WI  
Organization Name: Tom Steinbach

If it isn't a harsh material then why shouldn't it be used.

Document Subtype: Comment  
Status: Posted

**PRO – listing Sodium Nitrate with annotation**

Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 12 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1f383  
First Name: Tye  
Last Name: Fleming  
City: Orondo  
Country: United States  
State or Province: WA  
Organization Name: Wee Hoot Orchard, Inc

Should be allowed when used properly. It differential and is only posted within the soil.

Document Subtype: Comment  
Status: Posted  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c202a4  
First Name: Vaughn  
Last Name: Sherman  
City: Dryden  
Country: United States

**PRO – listing Sodium Nitrate with annotation**

State or Province: NY  
Organization Name: Jerry Dell Farm, Inc

I think it's a very good tool for farmers, and I don't see any reason why we shouldn't allow the use of it.

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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c20350  
First Name: Walter  
Last Name: Zurakowski  
City: Thorp  
Country: United States  
State or Province: WI  
Organization Name: Walter Zurakowski

It helps with the farming.

Document Subtype: Comment  
Status: Posted  
Received Date: April 08 2011, at 12:00 AM Eastern Daylight Time  
Date Posted: April 14 2011, at 12:00 AM Eastern Daylight Time  
Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time

## PRO – listing Sodium Nitrate with annotation

Page Count: 0  
Comment Tracking Number: 80c1f602  
First Name: Wayne  
Last Name: Reinhard  
City: Bluffton  
Country: United States  
Organization Name: Wayne Reinhard

We are already very limited on nitrogen sources, and natural sodium nitrate seems to work very well for a nitrogen source.

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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c203ea  
First Name: Weston  
Last Name: Lant  
City: New Bedford  
Country: United States  
State or Province: MA  
Organization Name: Lucky Field Organics

It's a valuable tool which is hard to replace. I think if it is used in moderate amounts, it can be very helpful

Document Subtype: Comment

**PRO – listing Sodium Nitrate with annotation**

Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c20342  
First Name: William  
Last Name: Reynolds  
City: Scotia  
Country: United States  
State or Province: CA  
Organization Name: Eel River Produce

As long as it's natural, it should be allowed.

Document Subtype: Comment  
Status: Posted  
Received Date: April 09 2011, at 12:00 AM Eastern Daylight Time  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c20339  
First Name: William  
Last Name: Turner  
City: Kelseyville

**PRO – listing Sodium Nitrate with annotation**

Country: United States  
State or Province: CA  
Organization Name: Walking Horse Ranch

We have to put something back in the soil. You cannot continuously remove crops without fortifying the soil to keep the strength up and keep things growing.

Document Subtype: Comment  
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Comment Start Date: March 04 2011, at 12:00 AM Eastern Standard Time  
Comment Due Date: April 10 2011, at 12:00 AM Eastern Daylight Time  
Page Count: 0  
Comment Tracking Number: 80c1ef19  
First Name: William  
Last Name: Wyatt  
City: Gretna  
Country: United States  
State or Province: VA  
Organization Name: Wyatt's Deer Track Farm

It is very helpful in growing out crops.



Comments from Jaydee Hanson, Policy Director, International Center for Technology Assessment

To National Organic Program, US Department of Agriculture

September 20, 2011

I appreciate this chance to talk with the National Organic Program about what I think is a way to implement the National Organic Standards Board March 2007 recommendation on excluding farm animal clones and their offspring from the organic market.

I have a lifelong interest in cattle breeding, so I am presenting you a table of some of the cattle breeding associations that already have adopted policies requiring information on whether an animal is a clone or descended from a clone. Pig registries and goat registries also require cloning status, but given that most of the cloned farm animals are cattle, I think this chart and the accompanying appendix, including the text of the cloning registry requirements for many of the breeds, is a good example of how tracking of clones and their offspring are being tracked by the breeding associations.

Moreover, all of the beef breeds with large numbers of animals going to market: Angus, Herefords, and Texas Longhorns—have requirements for tracking clones and their progeny. All four of the major Dairy breeds—Jersey, Holstein, Guernsey, and Brown Swiss have similar requirements.

Many organic farmers already keep pedigrees on their animals and for the ones that do not, a requirement that they verify the pedigree of an animal is no more complicated than other requirements that they implement to have their products certified as organic.

It will be more and more important that the US National Organic Program implement the recommendation of the NOSB on clones and their progeny. The Canadian Organic Standard was amended to exclude clones and their offspring from organic in 2008. The Soil Association of the UK, which administers organic standards for the UK, has a campaign to get Europe to ban clones and their offspring altogether. Indeed, the new European rules on novel foods were derailed this year due to a conflict between the European Parliament and the European Commission on whether clones and their offspring should be permitted in the EU marketplace.

US organic farmers who export meat and milk products to other countries will be disadvantaged if the US National Organic Program fails to adopt a clear exclusion of clones and their offspring from the market. I believe that clones and their offspring could be easily tracked through pedigrees. The few herd registries that do not track cloning status, could easily adopt the rules that other breeding associations have already adopted.

This is the simplest way to implement the recommendation of the National Organic Standard Board from March 2007. I and my colleagues would be glad to help you in any way we can.



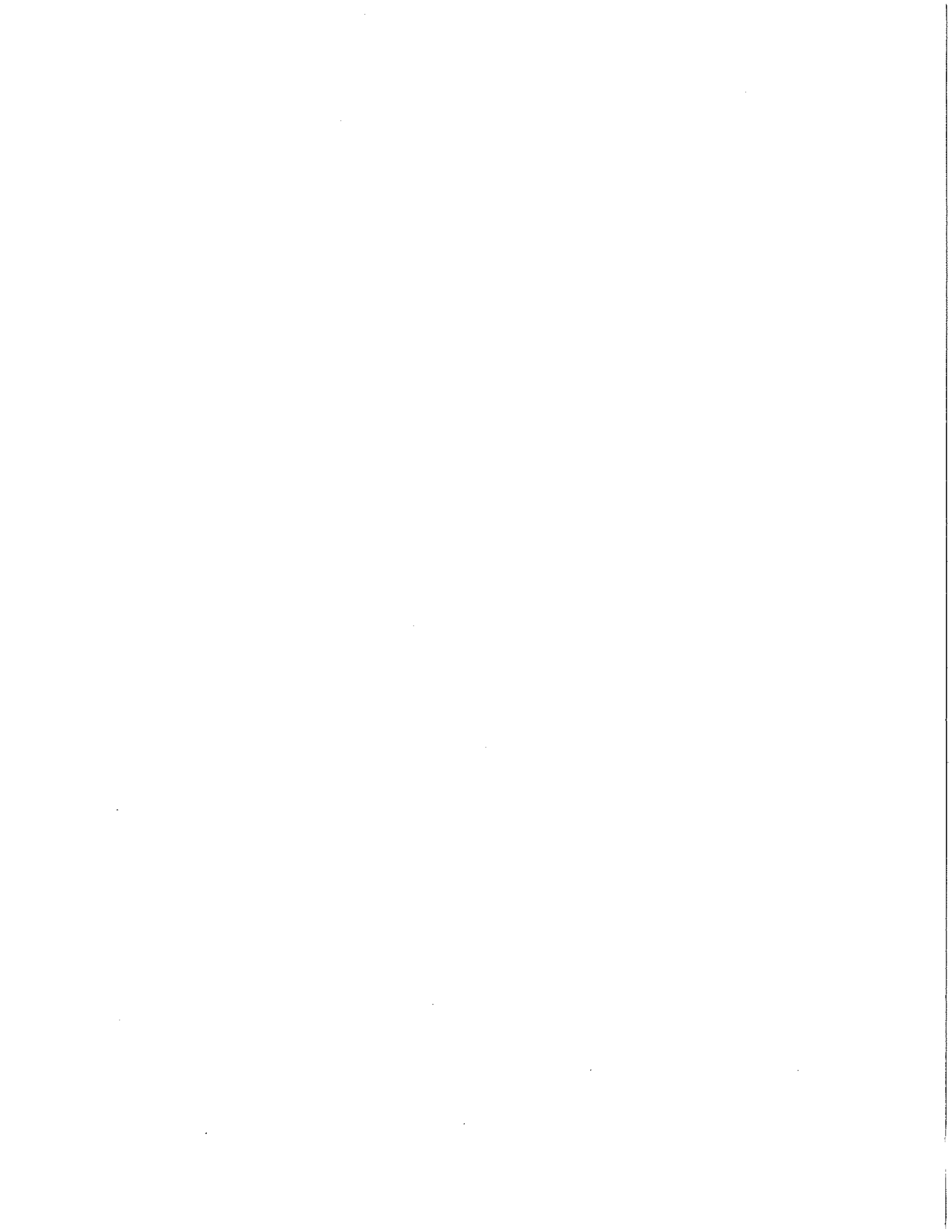




Table 1: US Cattle Breeds that require information on clones and offspring in registry.

<u>Name of Association</u>	<u>Rules</u>
<b>BEEF</b>	Register Clone status in Pedigree
American Angus Association	Yes
Beefmaster Breeders United	Yes
American Akaushi Association	Yes
American Brahman Breeders Association	Yes
American Chianina Association	Yes
American Gelbvieh Association	YES
North American Limousin Foundation	Yes
American Maine-Anjou Association	Maybe
Red Angus Association of America	Yes
American Red Brangus Association	Yes
American Salers Association	Maybe
Santa Gertrudis Breeders International	Maybe
Senepol Cattle Breeders Association	Maybe
American Shorthorn Association	Yes
American Simmental Association	Yes
Texas Longhorn Breeders Association of America	Yes
American Hereford Association	Yes
<b>DAIRY</b>	
Holstein Association, USA Inc.	Yes
American Guernsey Association	Yes
American Jersey Cattle Association	Yes
Brown Swiss Cattle Breeder's Association of the U.S.A., Inc.	Yes

## **American Angus Association**

Angus Information Management Software requires information on cloning status for both born calves and embryos. [http://www.angus.org/Aims/helpfiles/UsersManual\\_Interactive.pdf](http://www.angus.org/Aims/helpfiles/UsersManual_Interactive.pdf)

American Angus Association charges an additional \$50 to register a clone.

[http://www.angusbeefbulletin.com/ArticlePDF/AJ0405\\_Assnhighlights.pdf](http://www.angusbeefbulletin.com/ArticlePDF/AJ0405_Assnhighlights.pdf)

And separate registration of clones is required: [http://www.angus.org/Pub/brg\\_part4.pdf](http://www.angus.org/Pub/brg_part4.pdf)

Registration applications for cell-clone animals also are available upon request from the American Angus Association. <http://www.angus.org/Pub/brg.pdf>

*Form of application. A registration application must contain the following information:*

- *Sex of animal to be registered.*
  - *Date of birth.*
  - *Name of the animal.*
  - *Indication of whether or not the animal is the product of Artificial Insemination.*
  - *Permanent identification marks.*
  - *Registration number of the Sire.*
  - *Registration number of the Dam.*
  - *Name, location and Member Code of the First Owner.*
  - *Completion, including signature, of the Breeder's Certificate, if required [see Rule 102(d)(3)].*
  - *Completion, including signature, of the Bull Permit, if required [see Rule 102(d)(4)].*
  - *Indication of whether the animal is a twin or of other multiple birth.*
  - *AI Service Certificate, if required.*
  - *Indication of whether the animal is a result of an embryo transplant.*
  - *Completion date of embryo removal if the calf is the result of an embryo transplant, as well as indication of whether the calf resulted from split or cloned embryos.*
- Each registration with the Association shall be assigned a registration number.*

## **American Chiana Association**

<http://www.chicattle.org/images/2011/pdf/ACAAppforRegistration.pdf>

Clone status required for herd registration.

## **American Akaushi Association**

[https://americanakaushiassociation.com/uploads/American\\_Akaushi\\_Assn\\_Rules\\_Rev.\\_2-01-10.pdf](https://americanakaushiassociation.com/uploads/American_Akaushi_Assn_Rules_Rev._2-01-10.pdf)

## **American Gelbvieh Association**

[http://www.gelbvieh.org/goopages/pages\\_downloadgallery/downloadget.php?filename=13564.pdf&orig\\_name=gv\\_rules\\_9\\_2009\\_final.pdf](http://www.gelbvieh.org/goopages/pages_downloadgallery/downloadget.php?filename=13564.pdf&orig_name=gv_rules_9_2009_final.pdf)

*Calves Resulting from Cell-cloned Transplants.*

*1. Only replication cell-cloned animals shall be eligible for registration. Genetically modified animals shall not be eligible for registration.*

2. *The cell-donor animal and the cell-cloned animal must be DNA-marker-typed.*
3. *The breeder of the cell-donor animal must be identified as the breeder of the cell-cloned offspring.*
4. *The owner of record of the cell-donor, on the date of biopsy removal, will be identified as the first owner, unless the calf is a result of a pregnant recipient, purchased embryo, fresh or frozen, in which case the purchaser may be identified as the first owner.*
5. *DNA-marker-typing of the recipient dam may be required by the Association.*
6. *Calves conceived after death of cell-donor animals shall be eligible for registration under the same conditions and provisions governing the eligibility of calves prior to the death of said animal.*
7. *Registration of cell-cloned transplants shall be made on a special form, provided by the Association, at the regular fee, plus an additional fee as determined by the Board of Directors.*
8. *Registration certificates issued for cell-cloned transplants shall be so designated. The registration number of the animal, which is being cell cloned, shall also be stated on the certificate of registration. Nothing set forth in this Rule 104(c) should be construed as an indication that the Association takes any position as to the ownership rights, if any, of retained cell material. That is a separate matter reserved for discussion or negotiation between the buyer and seller. Cell-cloned transplants*  
*The following requirements shall apply to the registration of calves resulting from cell-cloned transplants.*
  1. *Only replication cell-cloned animals shall be eligible for registration.*
  2. *The cell-donor animal must be DNA-marker-typed by the official DNA testing laboratory of the AGA prior to harvest of genetic material. DNA-marker-typing of the cell cloned animal, and/or recipient dams, may be required by the Association.*
  3. *The suffix "ETN" shall be added to the names of offspring resulting from cloning or other advanced reproductive technology. If cloned offspring are registered with the same name as the source animal, the name of each clone will be distinguished by a consecutive Arabic number preceding the suffix of "ETN" starting with the digit "2". (i.e., 2ETN or 3ETN). The sire and dam of a clone will be shown on the registration certificate as being the same as the sire and dam of the source animal, fetus or embryo.*
  4. *When cloned calves are registered, the breeder of the entity from which the nuclear material originates will be recorded as the breeder of all resultant offspring and that breeder's prefix will be used in the naming of each clone.*
  5. *The owner of record of the cell-donor on the date of biopsy removal, shall be identified as the first owner, unless the calf is a result of a pregnant recipient, purchased embryo, fresh or frozen, in which case the purchaser will be identified as the first owner. If the applicant for registration is other than the breeder, the written transfer of ownership of the cell-cloned animal from the breeder to the applicant must be documented as required by the Association.*
  6. *Calves conceived after death of nuclear material-donor animals, shall be eligible for registration under the same conditions and provisions governing the eligibility of calves prior to the death of said animal.*
  7. *Registrations of cell-clone transplants shall be made on special forms provided by the Association, at the regular fee, plus an additional fee as determined by the Board of Directors.*
  8. *Registration certificates issued for cell-cloned transplants shall be designated. The name and registration number of the animal which is being cell-cloned, shall also be stated on the certificate of registration.*

9. The Association shall not be responsible for determining the ownership rights of any retained cell material, if any. Ownership rights shall be determined by the original written agreement between the owner of the cloned animal and the purchaser of the cell-cloned transplant(s).
10. Even though clones will share the same genetic information, only those production and classification records from each specific animal will be displayed on its own performance products.
11. All other requirements for the registration of offspring resulting from embryo transfer not inconsistent with these rules and rules regarding the sale and transfer of embryos will also apply to cell-cloned transplant(s).
12. The Association shall develop forms necessary to identify the source of the nuclear DNA, the host cytoplasm/oocytes and a certificate of embryo production from the combination of such nuclear material and host cytoplasm/oocytes.

### **Beefmaster Breeders United**

<http://www.beefmasters.org/PDFs/2009/Policies%20and%20Procedures/Procedures%20Handbook/Member%20Handbook%20Policies%20&%20Procedures%202009.pdf>

*CLONES: Only BBU replication cell-cloned animals shall be eligible for registration and eligible to sell in BBU Voluntary Approved Sales. Genetically modified animals shall not be eligible for registration and cannot sell in BBU Voluntary Approved Sales. Cloned animals shall be guaranteed by the seller(s) to be breeders under the same terms of this agreement for females and bulls. ALL ADDITIONAL GUARANTEES WITH RESPECT TO CLONES SHALL BE A SEPARATE AGREEMENT BETWEEN BUYER AND SELLER.*

*BULLS: If within one-hundred twenty (120) days from*

### **American Hereford Association**

[http://hereford.org/static/files/HB11\\_4\\_AHARulesAndRegs.pdf](http://hereford.org/static/files/HB11_4_AHARulesAndRegs.pdf)

#### **SECTION VIII: RULES REGARDING CLONES**

- Rule 1. *ONLY REPLICATION CELL-CLONED animals shall be eligible for registration.*
- Rule 2. *THE CELL DONOR animal must be DNA-marker typed.*
- Rule 3. *THE BREEDER of the cell-donor animal must be identified as the breeder of the cell-cloned offspring.*
- Rule 4. *THE OWNER OF RECORD of the cell-donor, on the date of biopsy removal, will be identified as the first owner, unless the calf is the result of a pregnant recipient, purchased embryo — fresh or frozen — in which case the purchaser may be identified as the first owner.*
- Rule 5. *DNA MARKER typing of the cell-cloned animal, or recipient dams, may be required by the Association.*
- Rule 6. *CALVES CONCEIVED AFTER DEATH of cell-donor animals shall be eligible for registration under the same conditions and provisions governing the eligibility of calves prior to the death of said animal.*
- Rule 7. *REGISTRATION OF CELL-CLONED transplants shall be made on a special form, provided by the Association, at the regular fee, plus an additional fee as determined by the Board of Directors.*
- Rule 8. *REGISTRATION CERTIFICATES issued for cell-cloned transplants shall be so designated. The registration number of the animal, which is being cell-cloned, shall also be stated on the registration certificate.*
- Rule 9. *NOTHING SET FORTH herein should be construed as an indication that the Association takes any position as to the ownership rights, if any, of retained cell material. That is a separate matter reserved for discussion and/or negotiation between the buyer and seller.*
- Rule 10. *INITIAL BREEDING VALUES – EXPECTED*

*PROGENY DIFFERENCES (EPDs) generated from National Cattle Evaluation for a cloned animal shall be the same values as the cell-donor animal. All data of future progeny from a cloned animal will be pooled with the cell-donor progeny data for genetic evaluation.*

#### **American Jersey Cattle Association**

<http://www.usjersey.com/Programs/regrules.htm#Top>

*Sec. 11. Application for registration of animals must give:*

- (a) The sex of the animal.*
- (b) The name desired for the animal.*
- (c) The date of birth.*
- (d) The animal's permanent identification.*
- (e) Whether the animal resulted from artificial insemination.*
- (f) Whether or not the animal is a twin.*
- (g) Whether the animal is polled or horned.*
- (h) Whether or not the animal is the result of embryo transfer or clone.*
- (i) The name and Herd Register number of the sire.*
- (j) The name and Herd Register number of the dam.*
- (k) Signature and owner number of the applicant who shall be the first owner of the animals, defined in Rule II.*

#### **Holstein Association, USA**

[http://aipl.arsusda.gov/publish/other/2002/submit\\_7wc\\_norhowp.pdf](http://aipl.arsusda.gov/publish/other/2002/submit_7wc_norhowp.pdf)

*Holstein Association USA first registered calves from embryo splitting in 1982 and from nuclear transfer in 1989. Although nuclear-transfer clones are expected to have nearly identical nuclear DNA, their mitochondrial DNA will differ. Unfortunately, almost no recording has been made of the identity of recipient cells.*

#### **Red Angus Association of America**

[www.redangus.org/node/105/Rules\\_and\\_Regulations.pdf](http://www.redangus.org/node/105/Rules_and_Regulations.pdf)

##### **CLONE CALVES**

- 1. DNA Authentication – To be eligible for registration, both the genetic donor and clone must be DNA typed. The DNA of the clone must be compared to the DNA of the original animal, meeting the probability of exclusion values.*
- 2. Name – Cloned animals will carry a unique name designated by the first owner of the clone but must carry the suffix of CLN (maximum of 28 characters including the CLN suffix).*
- 3. Recorded Breeder – Breeder of the clone should be listed as the breeder of the genetic donor at the time the original animal was conceived.*
- 4. Recorded Owner – Owner of the clone should be listed as the first owner of the cloned animal.*
- 5. Registration Certificate – The word clone and the registration number of the genetic donor will be displayed on the registration certificate.*
- 6. Consent – For a breeder to have the right to clone an animal, they must have written consent from all the owners of the genetic donor who are current members of the association. Written consent must accompany the cloned animal(s) application for registration.*

## **American Brahman Breeders Association**

<http://www.brahman.org/PDFs/Join-ABBA/2011/rules-revised-2011.pdf>

### *CELL-CLONED TRANSPLANTS*

*The following requirements shall apply to the registration of calves resulting from cell-cloned transplants.*

*The registering breeder must be a member of the American Brahman Breeders Association.*

*Only replication cell-cloned animals shall be eligible for registration. Genetically modified animals shall not be eligible for registrations.*

*The cell-donor animal must be DNA Marker typed.*

*The breeder of the cell-donor animal must be identified as the breeder of the cell-cloned offspring.*

*The owner of record of the cell-donor, on the date of biopsy removal, will be identified as the first owner, unless the calf is a result of a pregnant recipient, purchased embryo, fresh or frozen, in which case the purchaser may be identified as the first owner.*

*DNA Marker typing of the cell-cloned animal, or recipient dams, may be required by the Association.*

*Calves conceived after death of cell-donor animals, shall be eligible for registration under the same conditions and provisions governing the eligibility of calves prior to the death of said animal.*

*Registration of cell-cloned transplants shall be made on a special form, provided by the Association, at the regular fee, plus an additional fee as determined by the Board of Directors.*

*Registration certificates issued for cell-cloned transplants shall be so designated. The registration number of the animal, which is being cell cloned, shall also be stated on the certificate of registration.*

*Nothing set forth herein should be construed as an indication that the Association takes any position as to the ownership rights, if any, of retained cell material. That is a separate matter reserved for discussion or negotiation between the buyer and seller.*

## **American Shorthorn Association**

[http://www.shorthorn.org/Images/registration/rules/Rules%20%20Regs%20Aug15%202011 .pdf](http://www.shorthorn.org/Images/registration/rules/Rules%20%20Regs%20Aug15%202011.pdf)

*CLONE ELIGIBILITY: The following points represent the ASA policy for the registration of cloned animal:*

- 1. Only replication cell-cloned animals shall be eligible for registration. Genetically modified animals shall not be eligible for registration.*
- 2. The cell donor animal and the cell-cloned animal must have a DNA genotype and genetic defect status on file with the ASA and be included on the ASA Genetic Defect Status List (consistent with Rule III, Section 8 of this document).*

## **Brown Swiss Cattle Breeder's Association of the U.S.A., Inc.**

<http://www.cyagra.com/brownswissreg.htm>

## *RULE 3 - REGISTRATION*

### *O. Embryo Transplants:*

*1. The recorded owner of the transplanted embryo at the time of birth of the resulting calf shall be eligible to apply for a Certificate of Registry.*

*2. A suffix must be included in the name of animals resulting from embryo transplants.*

*a. Animals resulting from single whole embryos must include the suffix ET in their name.*

*b. Animals resulting from split embryos must include the suffix ETS in their name.*

*c. Animals resulting from nuclear (cloning) embryos must include the suffix ETN in their name.*

### **American Guernsey Association**

**<http://www.usguernsey.com/sales/national081315.pdf>**

This link shows the sale of cloned Guernsey embryos. They are required to be named with the same name as the original animal with the prefix "CLX" following the name, where X = the number of clones in existence, i.e. the first clone would be CL2, the next CL3 etc.

The association, also, has policy on clones governing how pedigrees are printed that says that the original animal's genetic and performance data is used for young clones and then their own data is used when it is available.

### **North American Limousin Foundation**

Now Lists Clone status in the pedigrees of animals it registers.

[2011 - Young Sire Trait Leaders - YW North American Limousin ...  
www.nalf.org/pdf/2010/dec29/YSTLYWT.pdf](http://www.nalf.org/pdf/2010/dec29/YSTLYWT.pdf)

COLEMAN LIMOUSIN RANCH. CLONE-COLE FIRST DOWN 46D. 0.19. 0.35. 0.30. 0.24. 0.15.  
0.18. P+. P. 0.19. 0.17. 0.17. 0.17. 03/12/2009. CHARLO, MT. 70 \* ...

### *Registration Certificate*

- *Registration Prefix and Number: NALF assigns each clone its own unique registration number with a prefix of CLN indicating a clone.*
- *Blood Type Case Number: For clones, this number indicates DNA authentication case number. Information as to the specific DNA markers used for validation is included in the case documentation.*
- *Name of Animal: NALF assigns names to clones using the name prefix CLONE- followed by the first 19 letters and spaces of the original animal from which the clone was developed.*
- *Calf Herd ID: Same as for non-cloned animals - assigned by breeder.*
- *Birth Date: Birth date of specific clone.*

- *Prefix, Tattoo, Location: Same as for non-cloned animals - unique tattoo assigned by breeder according to NALF rules for herd prefix, year letter and location.*
- *Ownership Date: Same as for non-cloned animals.*
- *Breeder: The breeder of a clone is the owner of the dam of the original animal at the time the original animal was conceived.*
- *Original Applicant: The original applicant of a clone is the person owning the original animal at the time the tissue sample is collected from which specific clones are produced.*
- *Note: The registration certificates for offspring of clones (sires and dams) identify the clone from which the offspring were produced through the cloned parent(s) name and registration number on the certificate.*

### **American Simmental Association**

**<http://www.simmental.org/userimages/Rules%20Bylaws%202011.pdf>**

#### **3. Registration of Clones:**

a. **General Definition of a Clone.** A clone is a genetic copy of an existing genotype arising from (a) splitting a fertilized egg; or (b) the fusion of a donor animal's cell nucleus with a recipient oocyte (unfertilized egg). Clones transmit nearly identical genetic value to their offspring as compared with the original animal.

#### **b. Eligibility for Registration.**

1. Only clones created via replication of cells shall be eligible for registration. Genetically modified animals shall not be eligible. A clone must meet all other applicable ASA standards for registrations.
2. Clones may be created from fertilized eggs, cells from live animals or cells from deceased animals.
3. The original animal or embryo must be DNA tested and registered with the ASA.
4. A clone must be DNA typed to the original animal or embryo in the manner determined by the ASA to be eligible for registration.

c. **Identification of Breeder.** The breeder of the cell-donor animal or embryo will be identified as the breeder of the cloned offspring.

d. **Identification of Owner.** For clones obtained via nuclear transfer, the owner of record of the original animal, on the date of cloning, will be designated as the first owner of the clone. For clones obtained via the division of a fertilized egg, the owner of the divided embryo will be designated as the first owner of the clone.

#### **e. Registration.**

1. The first owner will be responsible for the registration and DNA verification of the original animal and clone.
2. Registration of clones shall be made on a special application for registration and the owner must designate that the animal is a clone. All cloned animals will be charged regular registration and transfer fees plus an additional fee as determined by the Board of Trustees.
3. Registration certificates for clones shall be so designated. The registration number of the original animal shall also be identified on the registration certificate.
4. The registered name of individual clones must include the cell-cloned family name.
5. All other standard registration requirements must be met.

f. **Retained Genetic Material.** Nothing set forth herein should be construed as an indication that the ASA takes any position as to the ownership rights, if any, of retained cell material. That is a separate matter reserved for discussion or negotiation between the buyer and seller.



## Texas Longhorn Breeders Association of America

This association makes clear on its registration form that cloning status is to be included in the pedigree of the animal. See the form below:

<http://www.tlbaa.org/registration/forms/Registration%20Application.pdf>

Rules on cloning are here:

<http://www.tlbaa.org/tlbaa/TLBAA%20Handbook%202010.pdf>

### *F. TLBAA Rules of Registration of Clones*

*The following requirements shall apply to the registration of calves resulting from cell-cloned transplants:*

- 1. Only replication cell-cloned animals shall be eligible for registration. Genetically modified animals shall not be eligible for registration. 2. The cell-donor animal must be DNA-marker-typed. A report of the results of DNA tests performed by the laboratory recognized by the TLBAA must be on file in the Association office prior to the registration of clones.*
- 3. Before individuals can be registered as clones, the clonal family (A clonal family is a group of individuals that have the same genotype; that is, all individuals are derived from the same cell line) must be certified with the TLBAA and given a TLBAA certification number. If it is determined that an animal appears in the lineage of a cell-donor animal, requesting Clonal Family Certification, that is eligible for TLBAA registration but cannot be traced within the TLBAA E.T. or A.I. certification requirements, the requesting cell-donor animal would not be eligible for certification.*
- 4. Clonal Family Certification requests submitted after October 1, 2006 will be subject to TLBAA Board approval.*
- 5. The TLBAA reserves the right to inspect any TLBAA registered animal identified as the cell-donor in all requests for a Clonal Family Certification with the cost of the inspection to be borne by the party seeking the clonal Family Certification.*
- 6. A clonal family must be established for each individual TLBAAA registered animal identified as the cell donor.*
- 7. Individual clones must be DNA (Deoxyribonucleic Acid) typed to the clonal family.*
- 8. The registered name of individual clones must include the TLBAA Clonal Family Certification number. All other standard registration requirements must be met.*
- 9. The breeder of the cell-donor animal must be identified as the breeder of the cell-cloned offspring.*
- 10. The owner of record of the cell-donor, on the date of the biopsy removal, will be identified as the first owner; unless, the calf is a result of a pregnant recipient or purchased embryo (fresh or frozen) in which case the purchaser may be identified as the first owner.*
- 11. Calves conceived after death of cell-donor animals, shall be eligible for registration under the same conditions and provisions governing the eligibility of calves prior to the death of said animal.*
- 12. Calves resulting from multiple sire breeding, using only sires .. registered in the same clonal family, are eligible for registration. Resulting calves will be registered, using the Clonal Family ..... Certification number. Individual registration numbers of all cloned sires must be provided at the time of registration of the calves.*
- 13. Registration of cell-cloned transplants shall be made on a TLBAA registration form, provided by the Association, at the regular fee, plus an additional fee as determined by the Board of Directors.*
- 14. Registration certificates issued for cell-cloned transplants shall be so designated. The Clonal Family Certification number of the animal, which is being cell-cloned, shall also be stated on the certificate of registration. Offspring of a registered clone, conceived by natural reproduction, shall be duly recorded in the Association herd book but shall carry a designation to denote clonal ancestry. Additionally, all*

*TLBAA registered animals, with a lienage containing a cell-cloned transplant, will be identified with the designation in their TLBAA registration number.*

*15. Nothing set forth herein should be construed as an indication that the Association takes any position as to the ownership rights, if any, of retained cell material. That is a separate matter reserved for discussion or negotiation between the buyer and seller. It shall be considered unethical and improper, at the time of sale of an animal, 27 Texas Longhorn Breeders Association of America to fail to fully disclose all information pertaining to ownership rights of retained cell material and/or cell line. A box on the TLBAA transfer form will be designated for the disclosure of any retained cell material and/or cell lines by the seller or previous owners of said animal.*

*16. In order to compile performance data, owners of all cell-cloned transplants will be encouraged to submit to the TLBAA: birthweight, and weight and horn measurements at six (6) month ..intervals until 3-years of age.*

#### **SOME CANADIAN AND EUROPEAN BREEDS WILL NOT REGISTER CLONES**

##### **Canadian Brown Swiss and Braunvieh Association**

<http://www.clrc.ca/13by-laws.pdf>

*The following Brown Swiss dairy animals are eligible for registration in the Brown Swiss Section of the Association Herd Book. No animals produced via clone or gene manipulation shall be eligible for registration.*

##### **Aberdeen-Angus Cattle Society (UK)**

<http://www.aberdeen-angus.co.uk/wp-content/uploads/ByeLaws2011.pdf>

*Cloning Any animal which is born as a direct result of cloning technology will not be eligible for entry into the Herd Book. Whilst it is acknowledged that cloned animals are entered into Herd Books of overseas societies, such animals will not be eligible for transfer into the Society's Herd Book. Progeny from such animals whether resulting from natural serv-ice, A.I. or E.T. will be eligible for entry into the Herd Book and their pedigree certificate marked accordingly.*

#### **CANADIAN ORGANIC STANDARDS PROHIBIT CLONES & THEIR OFFSPRING**

[http://www.ocia.org/ResourceCenter/Training/COR SP/COR Stds Final.pdf](http://www.ocia.org/ResourceCenter/Training/COR_SP/COR_Std Final.pdf)

##### *1.4 Prohibited Substances, Methods or Ingredients in Organic Production and Handling*

*k. cloned farm animals and their descendants. A producer shall know the lineage of any non-organic animal brought under organic management.*



# Maine's Organic Farms - An Impact Report

November 2010

Maine Organic Farmers  
and Gardeners Association

# Maine's Organic Farms - An Impact Report

## Executive Summary

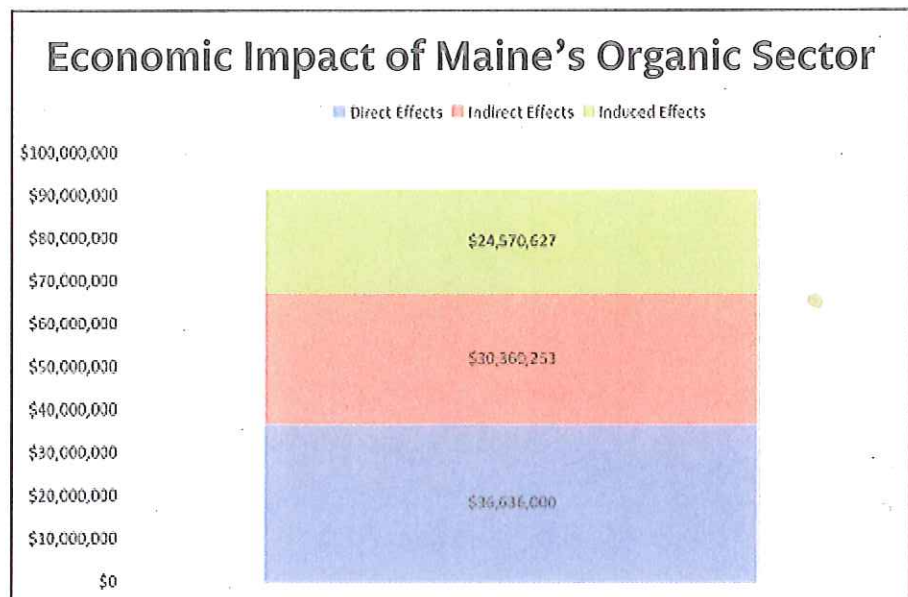
From humble beginnings, Maine's organic farm sector has cultivated a sizeable presence for itself on the State's agricultural landscape. The purpose of this report is to assess the size and economic impact of organic agriculture in Maine. It uses a special tabulation from the 2007 Census of Agriculture to do so.

In 2007, Maine had 582 organic farms. Maine's organic farmers generated \$36,636,000 of total economic output in 2007, and profited \$3,850,000 from an asset base of \$251,578,000. They do this on 94,446 acres of land while supporting 1,596 jobs. Organic farmers are more likely to be younger and female than their conventional counterparts.

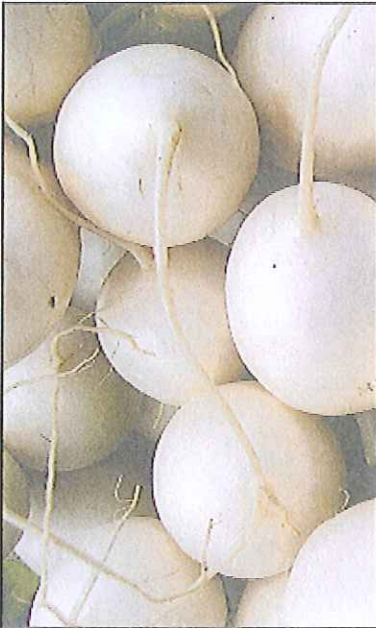
Organic agriculture, while small in total output relative to other types of farming, creates more jobs per farm. Organic farming utilizes natural fertility and human labor more than manufactured inputs to produce value. This means that organic farms create more jobs per farm than the State average, and profitable organic farmers return a higher margin of value to local economies than farms that rely on purchased inputs. This translates into a disproportionately larger economic impact for organic farms, especially in household spending. Organic farming leverages \$91.6 million in economic impact into the state of Maine.



Jean English photo



## 2 – Maine’s Organic Farms – An Impact Report



*Susan Leiter photo*

Organic farms represent a potential leverage point for economic growth and job creation, especially for younger Mainers.

Maine’s organic farm sector has grown by leaps and bounds over the last two decades. But this heady growth has also created new vulnerabilities that could undermine recent successes if not addressed. While still anchored by a core of diversified farms, most of the recent growth has been in commodity-based organic products, such as dairy and maple syrup. This leaves the organic sector more vulnerable to market fluctuations. Meanwhile, a sizeable group of diversified, “sustainable” farmers may share much in common with organic farmers, but are not choosing organic certification. Finally, the direct markets for organic products may not be able to sustain rapid growth indefinitely.

In order to mitigate these risks and remove barriers to profitability, this report offers the following recommendations for MOFGA and its supporters:

- Develop better financial and business planning resources for organic farmers.
- Strengthen alliances between certified organic farms and non-certified “sustainable” farms.
- Diversify market opportunities for organic dairy farmers – both products and channels.
- Develop market channels with small and mid-sized grocery stores for local, organic products.
- Continue to purchase local Maine foods from MOFGA-certified farms.

Every time a Maine citizen pays \$1 directly to a Maine organic farmer, we:

1. Provide that farm with \$1 in direct funding.
2. Create \$.83 in spending for other local businesses.
3. Create \$.67 derived from spending of Maine’s organic farm families.
4. Support one of 1,596 jobs on 582 farms.
5. Help to maintain 33,000 acres of cropland and another 8,500 of pasture in organic production.
6. Express our direct appreciation for the high-quality products that Maine’s organic farmers produce.

## I. Purpose of Report

From humble beginnings, Maine's organic farm sector has cultivated a sizeable presence for itself on the State's agricultural landscape. In spite of Maine's declining shares of national commodity markets for farm products, its organic farmers are innovating new production and marketing techniques to grow their businesses. And in doing so, they have helped to turned the tide of Maine's historically declining farm numbers, and are bringing new economic and social vitality to the state.

The purpose of this report is to take stock of Maine's organic farm sector, to identify its strengths and risks, to demonstrate that growth of organic farms is good for the State's economy, and to offer suggestions for how the sector can continue to grow. This report grapples with the following questions:

- What is meant by the organic farm sector?
- How many organic farms are there, and what is their share of Maine agriculture as a whole?
- How much land do they manage?
- How many jobs do they create?
- What is their economic impact?
- How do they return value to the communities they are nested within?
- How do they make their profits?
- What risks do they face?
- How can supporting organizations work to mitigate these risks and remove barriers to profitability?



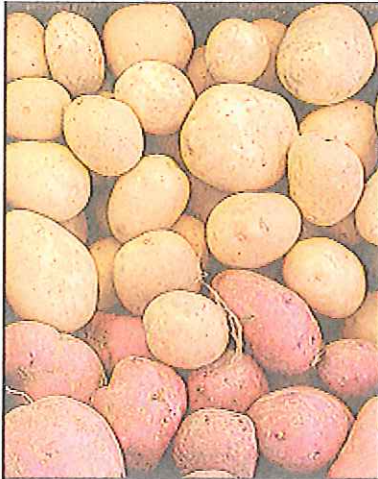
*Susan Leiter photo*

## II. Definitions and Sources

**Organic agriculture is built upon the foundation of a holistic ecological approach to farming.**

Organic agriculture is a system of farming derived from living, natural processes. Almost everything organic farmers put in their soils,

## 4 – Maine’s Organic Farms – An Impact Report



*Susan Leiter photo*

plants, and animals is alive, was alive, or came from a living thing; the remaining inputs come from naturally produced minerals.

But organic farming is more than the sum of a list of all-natural ingredients. Organic farmers work with the living systems native to their farms to create food and revenue. This reduces their need to purchase off-farm inputs. Not only is this a more resilient business strategy; it also retains more of the economic value that organic farms create within the state of Maine.

Maine boasts one of the oldest organizations dedicated to supporting organic farming: the Maine Organic Farmers and Gardeners Association formed in 1971. MOFGA defines organic agriculture as, “based on growing crops and livestock through the use of soil-enriching systems. Organic farmers are not allowed to use synthetic fertilizers or pesticides, and organic livestock are raised with organic feed and a narrow range of permitted medicines.”

**The National Organic Program has created a legal definition for organic that has helped to expand its market share.**

In 2002, after twelve years of debate, the “National Organic Program” went into legal effect. Now, all food products that use the term, “organic” in their marketing must have been produced under standards defined by the United States Department of Agriculture’s National Organic Program. No matter where you buy organic food in the United States, it must be produced under the same standards. While NOP holds the rights to control the standards, it contracts the actual inspections and certifications out to local organizations. In Maine, MOFGA Certification Services, LLC conducts the vast majority of inspections.

**How the Organic Data for this Report was Compiled.**

In 2007, the USDA Census of Agriculture captured detailed information about organic farmers in Maine. This report uses a special tabulation compiled by the USDA’s National Agricultural Statistics Service of production and financial for Maine’s organic farmers by industry classification.

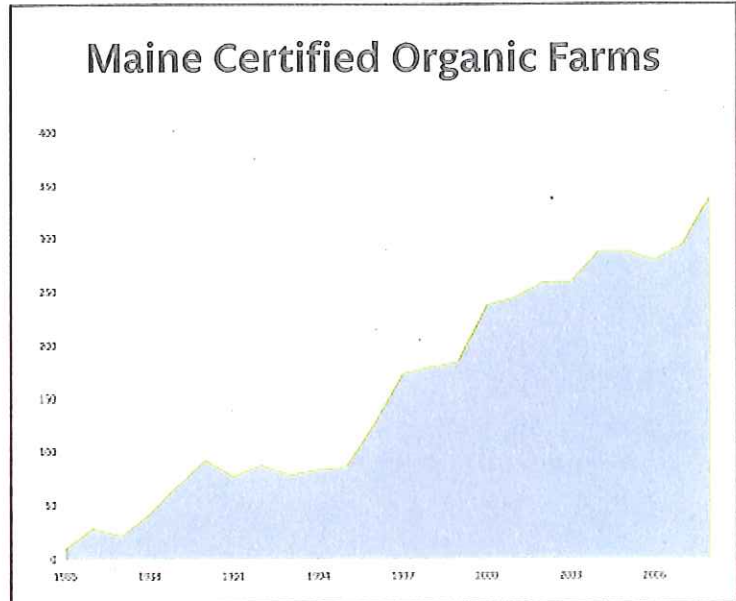
Unless otherwise cited, data and analysis in this report comes from this tabulation in combination with data from the regular Census for comparison. Other sources include MOFGA’s archives and the USDA Economic Research Service.

### III. Size and Scope

#### Organic farming is growing rapidly.

From 1988 to 2008, the number of certified organic farms rose from 41 to 339, a total growth of over 800%! Some of these are new farms starting up; others are conventional farms that decide to become organically certified. In 2007, Maine had 294 certified organic farms. Since farms with gross revenues of less than \$5,000 don't have to be certified, the USDA Census reports 582 organic farms in the state.

According to the 2008 Organic Production Survey put out by the National Agricultural Statistics Service, Maine had the 12th highest number of organic farms in 2008 – not bad for a state with relatively little clout on the national agricultural scene!



#### Economic output, impact, and jobs created.

Taken as a whole, Maine's organic farmers generated \$36,636,000 of total economic output in 2007, and profited \$3,850,000 from an asset base of \$251,578,000. They did this on 94,446 acres of land while supporting 1,596 jobs.

#### Organic farming's share of Maine agriculture.

Maine's organic farms occupy a relatively small slice of the whole Maine farm scene in terms of acreage, assets, and gross revenue – about 7% each. But organic farms create more jobs (8%) and are more likely to sell locally than their conventional counterparts. 10% of all Maine's organic products in 2007 were sold direct to consumers, representing 20% of all such sales in the state, which is disproportionately large compared to the organic sector's 5.5% share of total revenues. Organic vegetable farmers in particular sold 30% of their products directly.



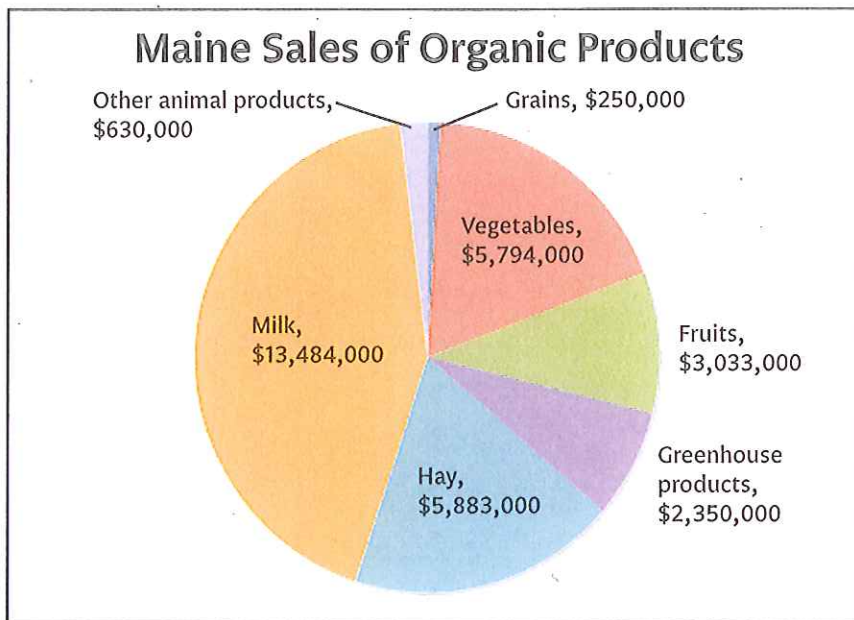
Jean English photo



### Sales Distribution of Organic Products

\$13.5 million, or 41% of all sales of Maine organic products, came from milk in 2007. When combined with the 18% of sales that came

from organic hay (much of which probably went to feed Maine’s organic dairy cows), Maine’s organic dairy sector accounted for over half the gross revenues of all organic products. Other big sellers included vegetables at \$5.8 million and fruit at \$3 million.

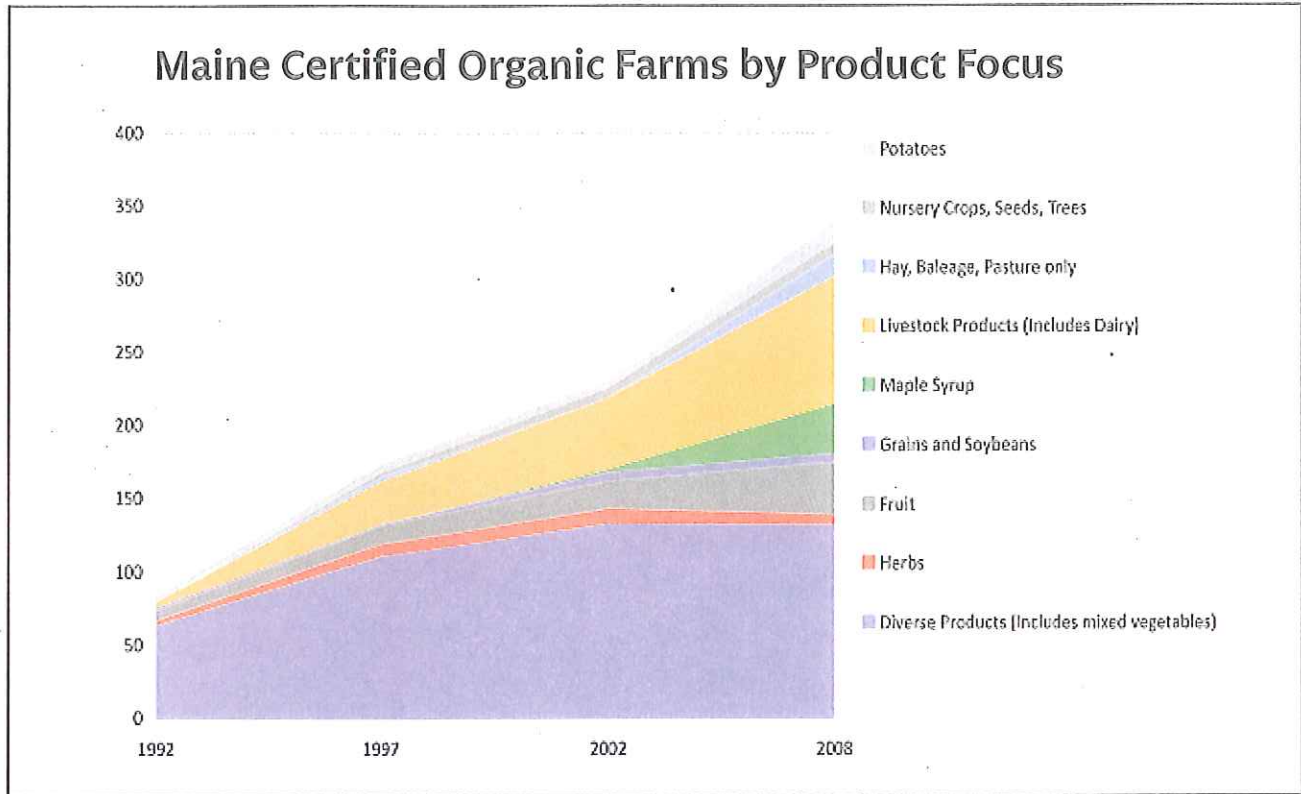


### The National Organic Program has changed the makeup of Maine’s organic farms.

Through the 1990s, the majority of organic farmers were diversified vegetable farmers – selling a range of products to mostly local markets. This began to

change around 2002. Assured by the uniform standards of the NOP, larger grocery stores began to stock organic products and sell them to a wider audience. This opened up market potential for organic foods that Maine’s farmers began to fill – but in a slightly different way. More specialized producers, focusing on the production of fewer types of products, began to become certified. These producers – especially dairy and maple syrup farmers – make up the majority of Maine’s growth over the last ten years, while the number of certified diversified vegetable producers – long the mainstay of the organic community – has leveled off. Since 2002, Maine has gained a net of 80 organic farms from 2002 to 2008, a growth of 24%.<sup>1</sup> Almost half of this growth comes from dairy farms that have transitioned to organic production, now that national standards have enabled organic milk to reach a larger regional customer base.

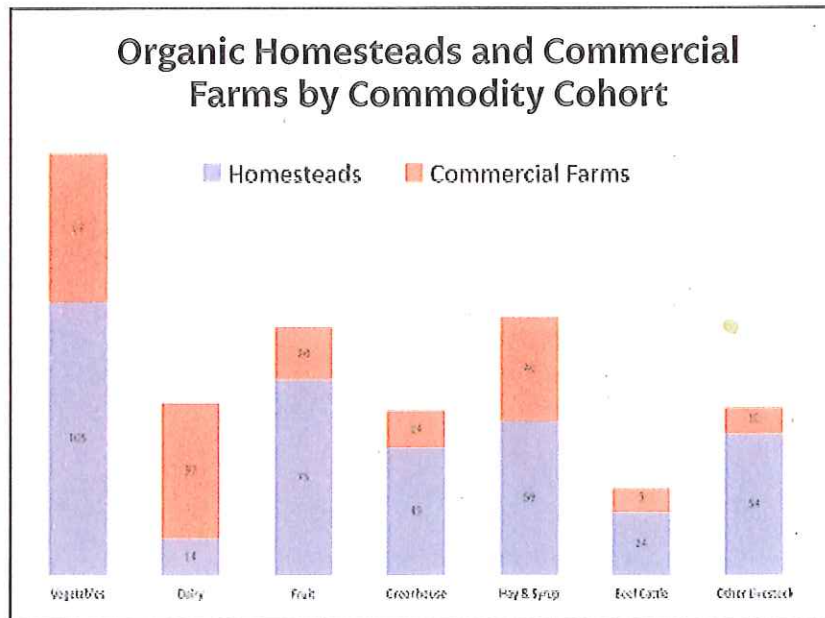
Some smaller, more diversified farmers may have dropped out of organic certification when the national standards arrived<sup>2</sup>. This may be because they were not satisfied with the federal organic standards, or their marketing strategies were focused on local customers and they did not see value in nationally recognized certification.



Many organic farms are oriented toward homesteading rather than commercial production.

The USDA census list three types of farms whose financial output does not fully meet their operators' needs: "limited resource farms," "retirement farms," and "residential/lifestyle farms." As a whole, these farms have net cash losses; but this does not reflect the true value they produce. Their farmers are growing food for home consumption, barter, and the fun of doing it, in addition to some modest sales. In order to support their farms, homesteaders have an off-farm source of income, such as a job, a spouse that works, or passive income.

About 65% of all organic farms on the Census are homestead-oriented. Organic fruit, greenhouse, and small livestock farms are most likely to be homesteads; organic dairies are least likely.



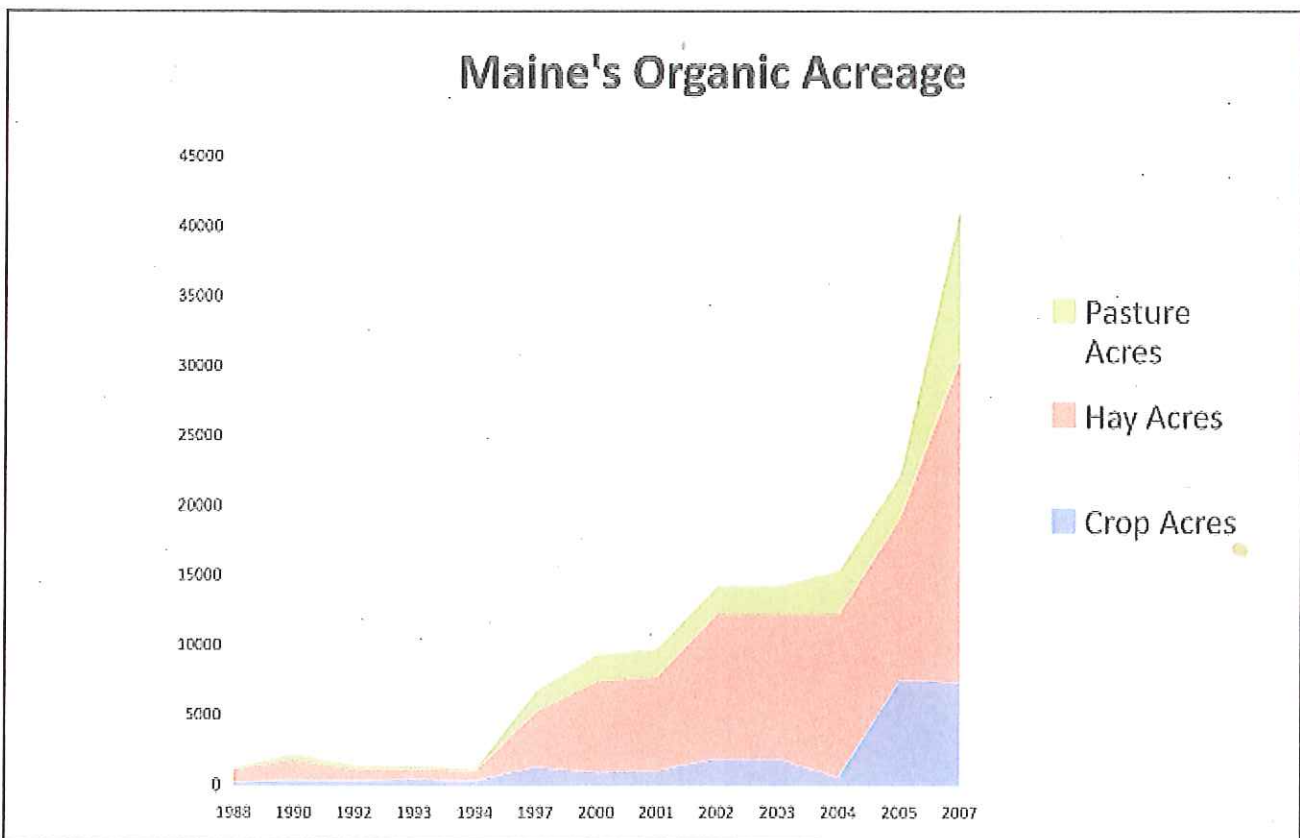
## IV. Land

Maine’s organic farms owned 94,446 acres of land in 2007, of which 38,767 were reported used for organic production<sup>3</sup>. This acreage represents 7% of all land in farms in Maine. The 38,767 productive acres represent open space that is not treated with non-organic chemicals or amendments. And the soil that Maine’s organic farms are building represents the wealth of future generations of Maine farmers.

### Maine’s organic cropland and pasture is rapidly increasing.

Since 2002, the amount of organic cropland, hayfields, and pasture has more than doubled, if numbers from the Economic Research Service<sup>4</sup> are correlated with Census data. This is a growth rate faster than the number of organic farms, showing that not only are more farms going organic, but bigger farms are as well.

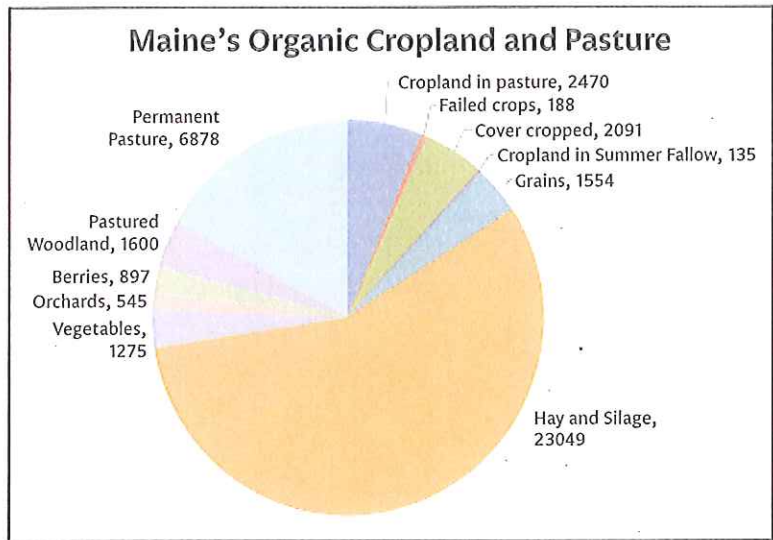
In 2007, over half of all Maine’s crop and pasture land was in hay, and an additional 16% in permanent pasture. Add pastured woodland and cropland in pasture to this, and about 83% of all Maine’s organic crop and pasture land were used in producing feedstocks for livestock.



In addition to crop and pasture land, Maine's organic farmers also managed about 45,000 acres of unpastured woodland, from which they make maple syrup and harvest timber.

**Maine's organic farmers rely heavily on cover cropping and composting to build soil fertility.**

Soil is the most important asset on an organic farm. It provides crops fertility, houses beneficial organisms, regulates water supply, prevents erosion and runoff, and fixes carbon. Organic farmers have a maxim: "feed the soil, not the plant." By building their soil, organic farmers create the conditions for healthy plants and animals.

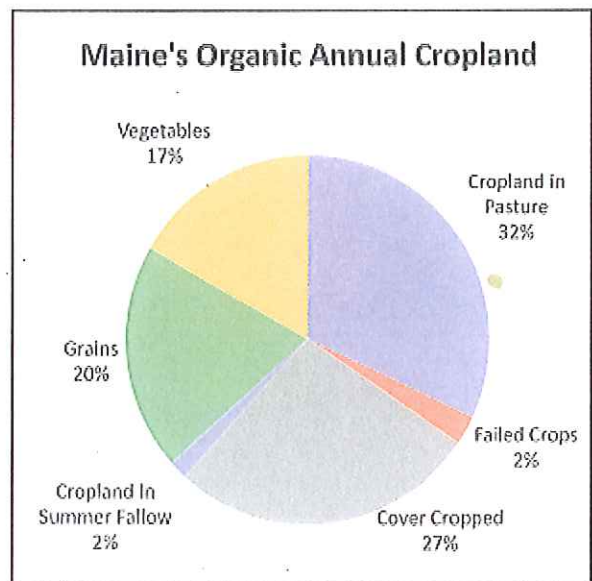


Organic farmers use many methods of building soil. They make compost from manure and other organic materials, and spread this on their fields. They plant cover crops, usually grasses and legumes, that build organic matter before being plowed under in preparation for a cash crop. With the right grazing management, farmers can even build fertility on cropland in pasture.

Assuming that virtually all cover cropped acreage is in rotation with annual crops (2,091 acres), Maine's organic farmers keep more under crop rotation than they do in planted annual crops (just over 1,800 acres). They also placed another 2,470 acres of cropland into short-term pasture, which also accumulates fertility for later annual use if managed properly. These actions assure that their soil will remain fertile even as their cash crops remove nutrients.

**Maine's organic crop farmers represent a financially viable way to maintain productive space on farmland threatened by development.**

Organic crop farming can leverage greater preservation per dollar than almost any other type of farming. Maine's organic vegetable and fruit farmers netted \$217 and \$246 per acre of cropland and pasture respectively, far above the state average of \$83. This means they need far less land to be viable, which fits synergistically with the higher prices and smaller



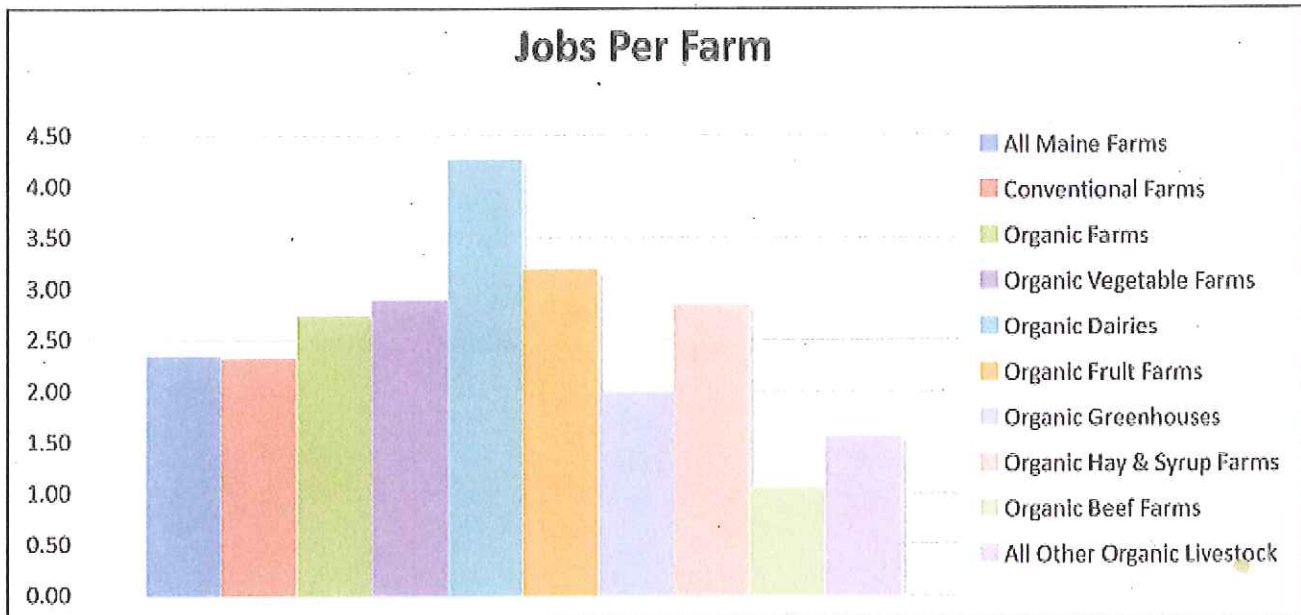
parcels of land near developed areas. Furthermore, they are more likely to invert the challenge of farming near a population center on its head and turn it into an advantage: organic vegetable farmers sell 30% of their products direct to consumers. Being near population is a strategic marketing advantage for these types of farms.

## V. Jobs

**Organic farms create more jobs per farm than conventional farms.**

Maine’s organic farmers netted \$3.85 million in 2007, paid their workers \$5.9 million in wages, and supported 1,596 jobs.<sup>5</sup> And Maine’s organic farms support more jobs – 2.7 per farm compared to 2.3 for conventional farms. Organic dairies support four jobs per farm.

Some organic farms are extremely labor intensive – for instance, organic vegetable and fruit farms spend 29% and 27% of their expenses on labor, compared to the State average of 18%. This means more of these farms’ total output is ploughed back into their communities as farm workers spend their wages at local businesses.



## VI. Demographics

Not only do organic farms create a high level of jobs per farm – the workers in those jobs are more likely to be younger and female than on conventional farms.

Led by a vanguard “spike” of baby boomers, organic farmers as a group tend to be younger than conventional farmers.

37% of all organic farmers are aged 55-64, representing a demographic spike not as marked in the conventional farming group. This represents the “back to the landers” who initially founded MOFGA and started the organic movement in Maine.

Behind this spike, more organic farmers are younger than conventional farmers. Additionally, MOFGA reports a sharp increase in the number of farmers in their 20s and 30s starting farm businesses in the last three years (since the Census was tabulated). Conventional farmers are more likely to be older than 70 than organic farmers.

Organic farmers are also more likely to be female. 34% of all principal operators on organic farms are female, compared to 24% for conventional farms.

The organic farm listings in old editions of *The Maine Organic Farmer & Gardener* reveal a slightly different story. On the Census, there can be only one “principal operator” listed, no matter who pitches in in what way. *The MOF&G* lets farms attach as many names as they want. Over half of all certified farms listed, historically and now, are run by a man and woman couple. If there is not a couple running the farm, the farmer is more likely to be male.



Jean English photo



Jean English photo



Melissa White Pillsbury photo

## VII. Making Profit on Organic Farms

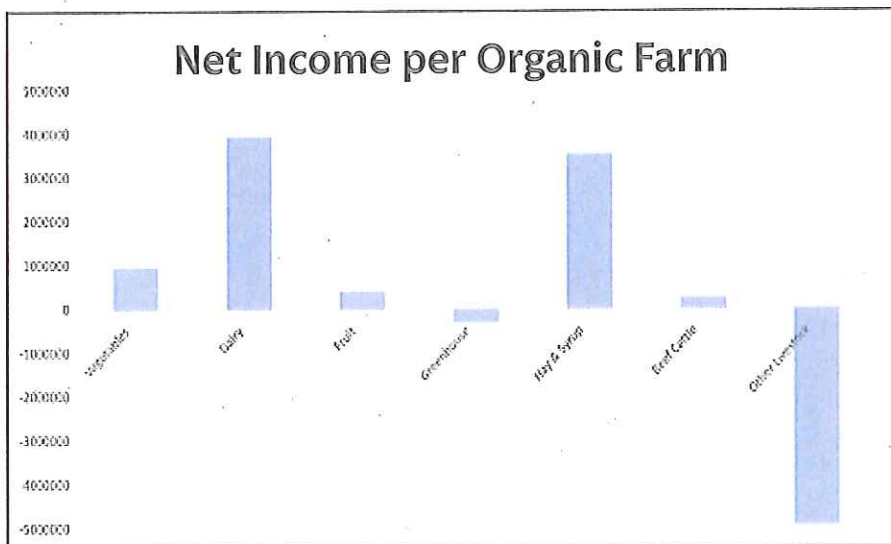
Organic farms can be profitable when managed for commercial, rather than homestead, production.

Organic farms rely on the natural vitality of their farms to produce value, thus reducing input costs. And the organic brand generates a price premium – which the organic farmer captures a share of. It is these two factors – the ability to cost-effectively substitute purchased inputs with homegrown, and the ability to negotiate a substantial share of the final organic premium – that determine a commercial organic farm’s profitability.

In 2007, organic dairy farms tended to be larger, and they netted the highest per farm profits in 2007, at \$59k per farm. Hay and syrup farms came in second at \$35k per farm. These two groups also had the highest profit ratios.

Averages can be deceiving, however; for instance, while the average net per organic vegetable farm is a little less than \$6,000, 51 of 172 organic veggie growers report that the farm meets their financial needs – and they’re probably profiting a little bit more than \$6k each annually. 42 growers reported net incomes of \$10,000 or more – about one quarter of the total. With fruit and beef farmers, the results are similar.

This reflects the gap between “homestead” and “commercial” farms. Across the board, those cohorts that have more “homesteaders” reveal a smaller net profit per farm. Indeed the correlation between net profits per farm and percentage of commercial farms in each cohort is a strong 79%.



Breakeven analysis offers a slightly different perspective on profitability.

Another way to measure profitability is by doing a “breakeven” analysis. This lets us see how much a farm might need to produce to break even on costs or profit a sum – and it gives us a more accurate answer as to the profitability of different types of organic farming. A

farm “breaks even” when its margin of revenues over variable costs equals its fixed costs. A farm may not be making any money at that point; but at least it’s not losing any either!

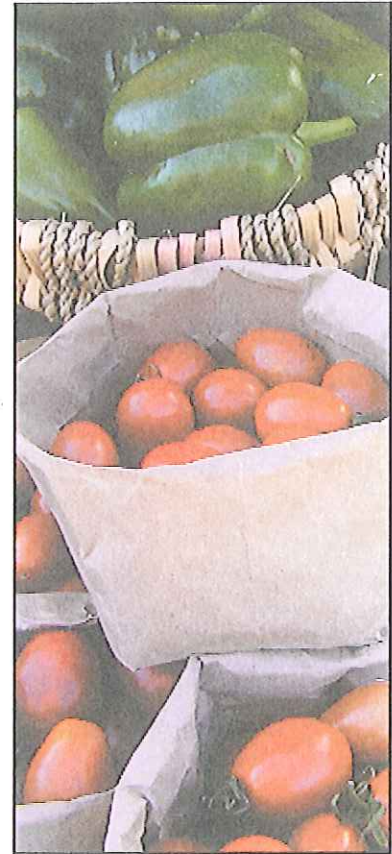
Fixed costs are expenses that do not vary in their amount, no matter how much a farm produces. These include interest payments on loans and depreciation (which usually gets expensed at a set rate no matter how much equipment gets used). Variable costs, on the other hand, are expenses that vary based on how much you want to produce. For instance, if you want to grow more tomatoes, you buy more seeds and more compost. Variable costs include soil inputs, seeds, fuel, and labor.

A farm with a heavy amount of fixed costs may be more profitable in any given year; but it also stands a higher risk of losing money if something goes sour, because it has to meet its monthly fixed bills, regardless of revenue.

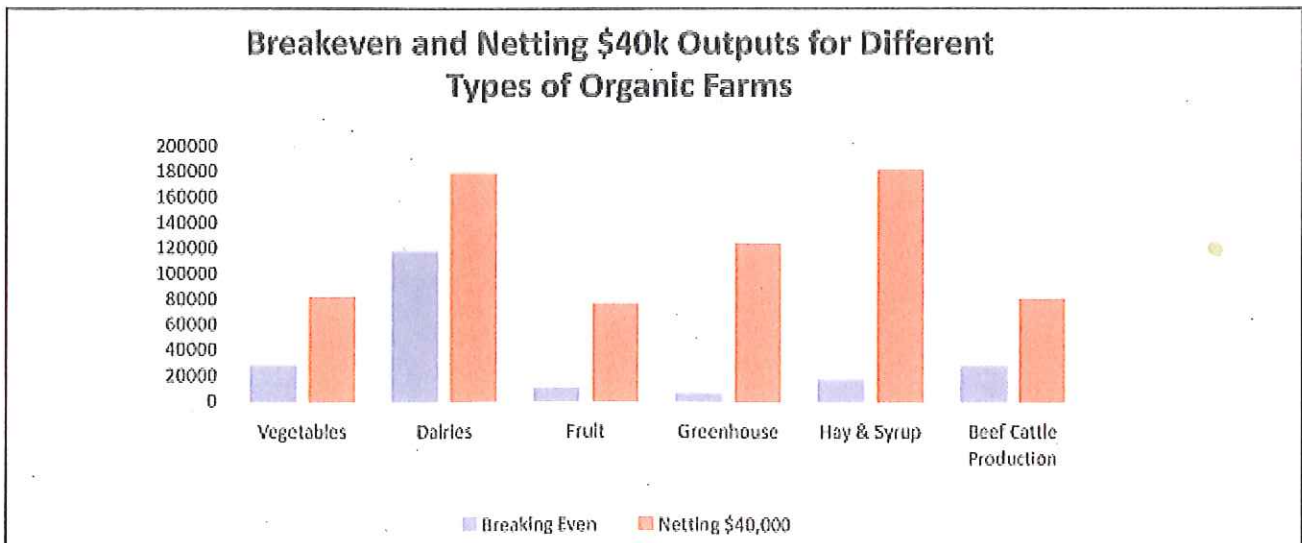
As might be expected, dairy farms carry much higher fixed costs. Hay and farms also carry a higher degree of fixed costs to variable costs.

This means that crop farms, especially fruit and vegetable farms, break even at much lower outputs. The average breakeven point for an organic fruit farm, for instance, is just under \$11,000, compared to \$117,000 for an organic dairy farm.

Another way to look at it is to ask, “How much would a farm need to produce to profit \$40,000?” Seen this way, the most profitable farms at the lowest level of gross income are vegetable, fruit, and beef farms - all at around \$80,000. Dairy, hay, and syrup farms each require an average of about \$180,000 gross to net \$40,000.



Jean English photo







Tim Nason photo

It is important to note that these “profits” do not necessarily reflect all of a farm’s cash expenses. For instance, only the interest on mortgage payments is reported as an expense, not the principal. Depending on where a farm business is in its life cycle, it may net less income than these numbers reflect.

### Two types of organic farms, two strategies for profitability.

Organic dairy farms are potentially the most profitable per farm. But they also required the largest investment to start up, and carry the highest level of fixed liabilities that could leave them vulnerable if the weather or market sours. These also tend to be more input-heavy, and less diversified. Their profitability depends on their ability to negotiate a fair share of the price premium for their product while controlling input prices, especially feed.

Organic vegetable, fruit and beef farms tend to be less profitable per farm, but require smaller investments to start up and produce decent income at lower levels of production. Their profitability depends on their ability to find high-value niche markets while keeping fixed capital costs low.

Both types of organic farming will need to thrive in order to increase the share of organic farms in Maine.

## VII. Economic Impact

### The Fly in the Ointment

When Clarence Day, preeminent historian of Maine agriculture, concluded his seminal *Farming in Maine, 1860-1940*, he noted, “the trend was away from general, self-sufficient farming toward commercial farming.” Diversified homesteads had given way to farm “sectors,” primarily dairy and potatoes. In general, Clarence Day lauded the transition from homesteading to commercial farming – Maine’s farmers were more productive and had more wealth.

“But there was a fly in the ointment. Maine had lost 25,000 farms between 1880 and 1940, and more than half the improved land ... many because they could not meet the requirements of the machine age ... the towns in which they were located lost population and human resources. Their schools were smaller, their churches weaker, their taxes higher, and lilacs grew where once a garden smiled.”

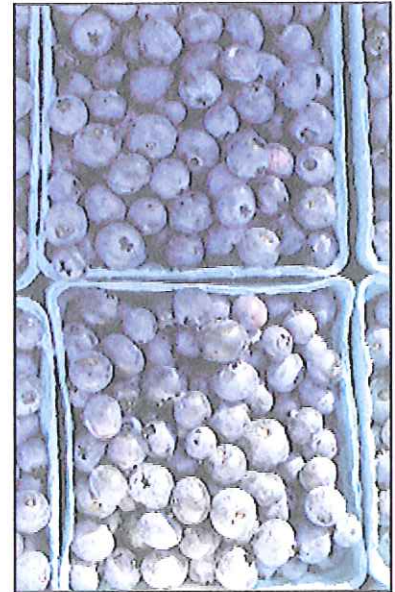
This trend of “fewer but larger” that Day observed has only been exacerbated since he wrote. As Maine’s farms have grown in size, they have replaced labor with inputs and machinery, and have come to depend on out-of-state sources for their purchases. This means that smaller and smaller margins of their gross output are returned to their communities in the form of net income, wages, and property taxes. In order to stay profitable against those declining margins, many farmers constantly look for ways to replace expensive, inefficient labor with cheaper, more efficient machines and inputs. Ironically, while policymakers and communities are constantly trying to figure out how to create more jobs in Maine, many farmers are busy trying to figure out how to eliminate them. They’ll go out of business if they don’t.

This is Clarence Day’s “fly in the ointment” magnified. Fewer farms and fewer jobs mean smaller communities and a smaller tax base. Take the conventional dairy industry. In 1961, there were 3,100 dairy farmers. In 1970, there were 1,700. In 2007, there were 396 dairy farms, of which 66 were organic. Conventional dairying accounted for \$124,651,000 worth of gross output, a full 19% of the State’s total – still dwarfing the organic sector’s 6% share. Clearly dairying in Maine will continue to be a very large and influential piece of the state’s farm sector.

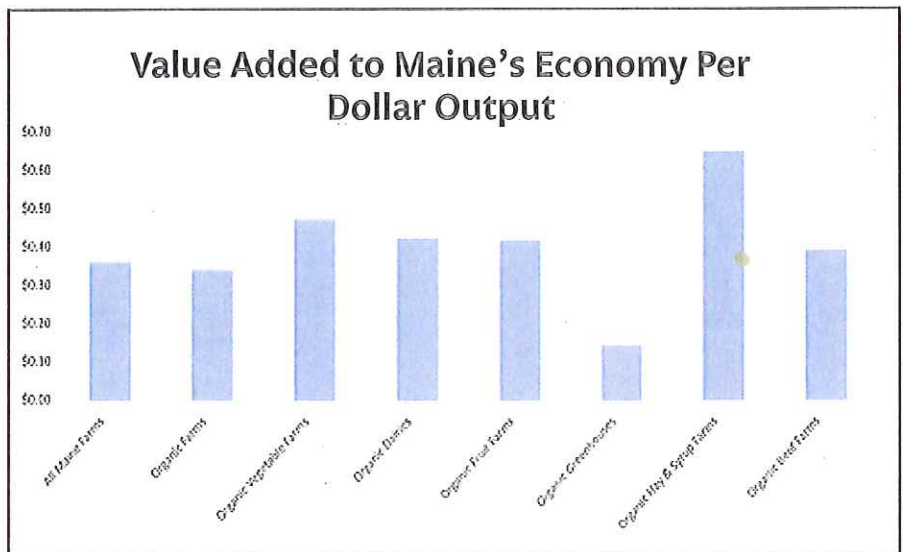
But conventional dairying is reliant on importing large amounts of inputs to stay profitable. Farmers and their hired help retained \$35,936,000, or about 28% of total output, for their efforts. This is comparable to the 28% of total revenue that they spent on imported feed alone.

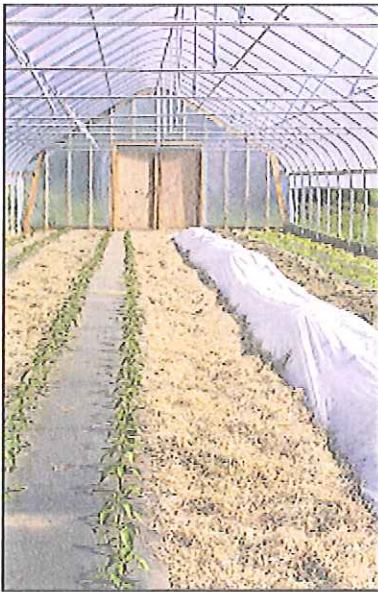
**Many organic farms return a high margin of value back to the communities they are nested within.**

Many organic farms are better at generating and retaining a high margin of value in local economies. On all Maine farms, net profits, wages, rent for land, and property taxes represent \$.34 on every dollar of total output. Economists call this figure, “value added,” because it represents the total value generated by an industry minus the inputs that it imports and manufactures into finished goods.



Melissa White Pillsbury photo





Jean English photo

Against this state average, several organic cohorts stand out. Vegetable farms add \$.47 on every dollar; dairies and fruit \$.42 each; and hay and maple syrup add \$.65 on each dollar.

Why is this? Organic farmers work together with the natural and social systems of their farms to create value, rather than “purchasing” and “manufacturing” inputs. Economically, this means organic agriculture *returns a higher margin of value to the farm families, communities, and soils it binds together.*

**Farms with a higher value added represent a key leverage point for growing the State’s local economy.**

It has long been believed that organic farming is better for the environment than conventional farming. Over the last two decades, many farmers have discovered it can be better for the bottom line. Now we are learning that organic farming can be a positive force in the overall economy. For every dollar of output that organic vegetable, dairy, fruit, hay, and syrup farms can grow, a greater proportion stays in the State’s local economy. They represent a leverage point for growth, job creation, farmland protection, and community vitality as Maine agriculture continues to adapt to change. This is the antidote to Clarence Day’s “fly in the ointment.”

**The higher value added from the organic sector’s profitable segments translates into a disproportionately large economic impact for organic farming, especially in household-induced spending.**

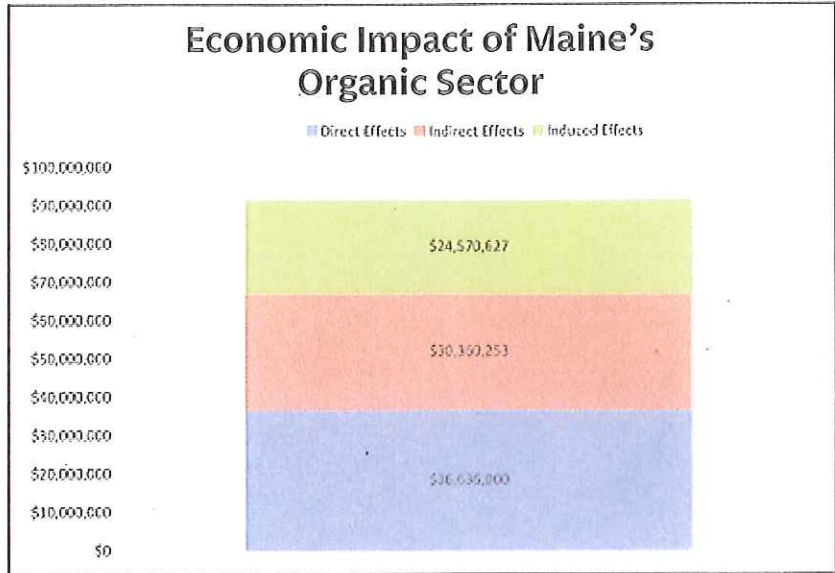
When any industry incurs costs and returns dividends, that money meanders through the rest of the local area, eventually dissipating out into larger economy. This happens in one of three ways:

1. Farms pay expenses for inputs, labor, and taxes, and return dividends to owners. This is called *direct* impact.
2. The businesses from whom they’ve bought things then turn around and make payments for their own expenses. This is called *indirect* impact.
3. The households who have been paid wages and profits from the farm spend that money at other businesses. This is called *induced* impact.

The sum of all three impacts – direct, indirect, and induced – is called the *total* economic impact for that industry. Induced impacts leverage a greater amount of economic impact than indirect impacts,

because money spent by households tends to stick around the local economy longer than money used by businesses to buy inputs.

The United States Bureau of Economic Analysis collects data on direct, indirect, and induced spending by region, state, and the nation as a whole, and tabulates that data into a series of tables, called “Regional Input-Output Multipliers” (RIMS II). A RIMS II table shows the amount of indirect, induced and total economic impact one dollar of economic output stimulates for each industry in any given region – called multipliers. This report uses the RIMS II table for Maine agriculture as a whole to estimate the impact of organic farming.

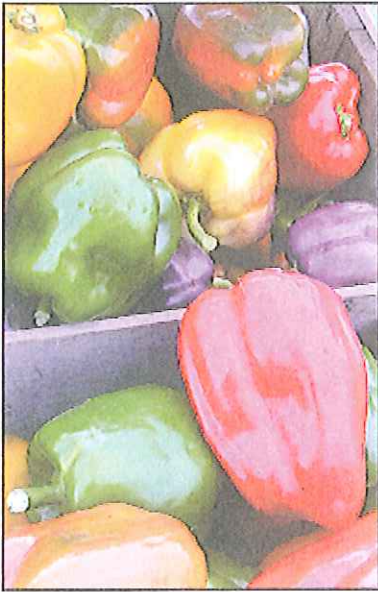


The \$36.6 million of direct impact by organic farmers translates into \$30.3 million in indirect impact and \$24.5 million in induced impact, for a total of \$91.5 million in economic impact. This represents a 5.3% share of Maine agriculture as a whole, in proportion with the share of certified farms.

**Indirect impacts for organic agriculture are probably greater than RIMS II estimates.**

The multipliers RIMS II uses to calculate direct impact are based on national averages. This means the average is heavily weighted toward industrial farms that import large quantities of inputs from non-local sources. Anecdotal evidence within the Maine organic community suggests that organic farmers tend to purchase more of their inputs from local sources. For instance, since organic soil fertility tends to come from compost, manure, and other heavy biomass, organic farmers are more likely to buy their soil inputs from other farmers or local compost businesses. And since organic farmers depend on the hardiness of their crop varieties for disease and pest resistance, they are more likely to purchase their seeds from local seed companies who have tested and proven those varieties to be suited for Maine.

This means that more of organic farmers' expenses support local businesses, their money stays in the local economy longer, and their indirect impact is probably higher than the \$.83 on the dollar that RIMS II estimates.



*Jean English photo*

## VIII. Risks and Challenges to Maine Organic Farms

Maine’s organic farm sector has grown by leaps and bounds over the last two decades. But this heady growth has also created new vulnerabilities that could undermine recent successes if not addressed. While still anchored by a core of diversified farms, most of the recent growth has been in commodity-based organic products, such as dairy and maple syrup. This leaves organic farming more vulnerable to market fluctuations. Meanwhile, a whole group of diversified, “sustainable” farmers may share much in common with organic farmers, but are not certified. Finally, the direct markets for organic markets may not be able to sustain rapid growth indefinitely.

### **Maine’s organic dairy farmers are facing a soft organic milk market.**

The national standards have undoubtedly created growth for Maine’s organic sector. But, because that growth has occurred mainly in a couple specialized commodities, it has also created new vulnerabilities for the organic community. One of them has become increasingly apparent in 2009.

2006-2007 represented a nadir for the organic dairy industry. In 2007, Maine’s organic dairy farmers were netting an average of \$59,800 per farm and returning \$.44 on every dollar back to their communities.

The opportunity to convert to organic has proved a boon to many of Maine’s smaller and mid-sized dairies. A 2008 study comparing organic dairy farms in Maine and Vermont with their conventional brethren confirms this notion.<sup>6</sup> “The organic dairy sector has become a haven for smaller family-operated farms that could not, or would not, continue getting bigger to remain economically viable in conventional dairy production.”

This growth has also been good for MOFGA and the Maine organic community. Organic fluid milk accounted for \$13.5 million, or 40%, of all organic sales in 2007. And most likely, a sizeable chunk of the organic hay and syrup farms’ 20% share of total sales went to feed cows on Maine’s organic dairies. Organic dairy farms managed just over 16,000 acres, or about half, of all certified cropland.

But while their systems were profitable in 2007, dairies were among the least resilient of Maine’s organic farms. They depended on milk for 93% of their sales in 2007, and purchased inputs accounted for 78% of costs. These dependencies could compromise the sustainability of the segment over time.

As long as final demand for organic milk continued to grow, everyone was happy. Milk processors received their chunk of the profits; so did the organic dairy farmers. But unlike the organic foods sold at farmer's markets, the organic milk sold in stores had become a commodity – organic maybe, but still a commodity. And in any kind of agricultural commodity supply chain, farmers possess the least relative bargaining power.

In 2008, the economic downturn caused recent converts to organic milk to switch back. According to a recent *Boston Globe* article, "Sales of organic milk have plunged and farmers who got lucrative deals from a dairy industry that was thirsty for the stuff now can't get rid of it. The volume of organic milk sold nationwide is expected to drop nearly 15 percent this year."<sup>7</sup>

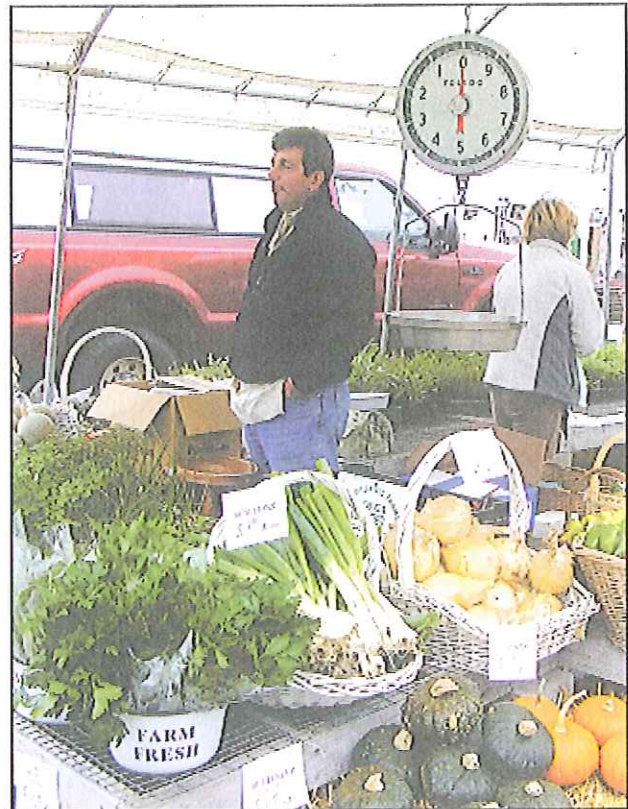
Since organic dairies have locked-in prices, the processors can't lower their prices – so they lower volume instead. Many organic dairies have been receiving calls telling them to cut back on production. Even if they do this efficiently, the average Maine organic dairy carried \$40,500 in annual fixed costs in 2007 that had to be met no matter what. The national commodity market for organic milk may not be a large enough place to sustain all organic dairies.

**The direct markets for organic foods may be finite.**

Maine's organic crop farmers, especially vegetable and fruit farmers, depend on direct sales to consumers for a large portion of their sales. Of these, the smaller farmers are especially dependent. It makes sense; direct sales to consumers yield the highest price premium, as the farm captures 100% of the "marketing bill."

Direct sales to consumers have been growing at a rapid pace; 39% from 2002 to 2007, and an astonishing 269% in Waldo County! And the near future is projected to see continuing growth.

But research suggests that the market for direct farm sales is ultimately finite. The Maine Department of Agriculture's "Agricultural Creative Economy" report cites a consumer study showing where consumers purchase their food.<sup>8</sup> About 12% say they purchase 1/4 or more of the family's produce at a farm direct market; these represent the hardcore "locavores" who are the low hanging fruit of farm-direct marketing ef-



*Jean English photo*



Jean English photo

forts. About 43% of families say they purchase some produce direct from farms, but less than a 1/4 of their total. These represent the “casual” local foods shoppers, who might need the occasional promotional nudge to be reminded to support their local farms. On the other hand, nearly half of all respondents said they bought more than 1/2 their produce at a grocery store less than 10 miles away.

Right now, local agriculture is thriving on a growing direct market, and goodwill amongst producers abounds. More farmers in the market bring more consumers to the “scene” at a net rate faster than the increased supply of food. But as the committed locavore base becomes saturated in any given area, this could change.

**The uncoupling of the organic brand from organic philosophy may limit the ability of MOFGA to connect with some small, diversified farms.**

The National Organic Program is very clear that its official definition of the word organic is for marketing only; it does not inherently mean food is healthier or environmentally benign. While this makes sense from a legal standpoint, it has uncoupled the definition of organic certification from the original intent of organic philosophy and production.

This has caused a group of diversified farmers to either drop certification, or not to consider it in the first place. While these farmers may use many organic practices and market locally, they don’t necessarily see the advantage of attaching themselves to a nationally recognized brand.

Instead of using organic certification, many of these farmers now self-apply the term, “sustainable” to describe themselves. Sustainable agriculture combines the ecological approach of organic farming with a locally-focused marketing plan.

In their large and detailed survey study of Maine farms, “Understanding the Dichotomy Between Industrial Agriculture and Sustainable Agriculture: Types and Characteristics of Maine Farms,” Stuart Smith, along with colleagues Pamela Bell and Andrew Files, define sustainable agriculture as representing a system which is, “decentralized, diverse, restrained, in harmony with nature, respectful of community and promotes independence.”<sup>9</sup>

Projecting from the Smith, Bell, and Files survey, about 3,190 farms of the 8,136 total might classify themselves as using sustainable techniques. These farmers could produce about \$180.5 million worth of products on about 570,000 acres of land. By these esti-

mates, sustainable farming makes up about 40% of the Maine agriculture scene.

Some sustainable farms may have been certified organic before the National Organic Program, or dropped out of certification due to their dissatisfaction with the federal standards. This is unfortunate – these two groups of farmers share much in common, and would undoubtedly have much wisdom to cross-pollinate. Un-certified sustainable farmers represent an opportunity for alliance with certified organic farms.

## IX. Recommendations

Maine's organic farm sector has come a long way over the last few decades. It has gone from a marginal position at the edge of a large conventional farm sector, to a niche that garners the hearts and attention of many Mainers. While organic farming is still small compared to the gross output of conventional farming, it has carved a place for itself that is profitable enough to sustain while returning a higher margin of value to the communities that support it.

Still, in order for Maine's organic farming to grow while meeting the challenges it faces, much work remains to be done. This report offers the following recommendations for MOFGA and its supporters:

### ***Continue to purchase local Maine foods from MOFGA-certified farms***

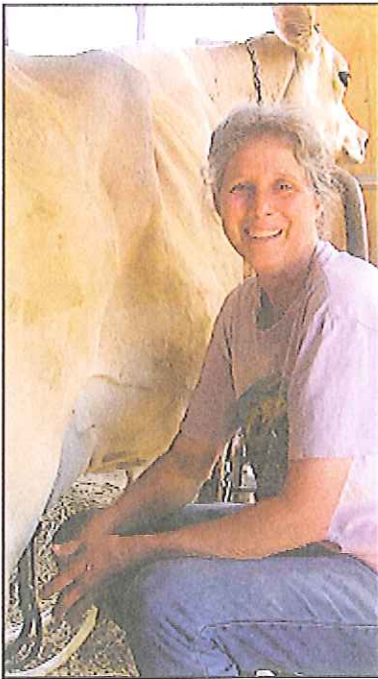
Every time a Maine citizen pays \$1 directly to a Maine organic farmer, we:

1. Provide that farm with \$1 in direct funding.
2. Create \$.83 in spending for other local businesses.
3. Create \$.67 derived from spending of Maine's organic farm families.
4. Support one of 1,596 jobs on 582 farms.
5. Help to maintain 33,000 acres of cropland and another 8,500 of pasture in organic production.
6. Express our direct appreciation for the high-quality products that Maine's organic farmers produce.



*Jean English photo*





Jean English photo

### ***Develop better business planning and financial tools for organic farms.***

Comparatively little is known about organic farming compared to conventional farming – especially when it comes to their financial performance and economic impact. Without this information, farmers are often left to guessing what sorts of goals and ratios they should create for themselves – and creditors may be leery of such an under-researched field.

MOFGA and its allies should develop better financial resources for its constituents. This could include publishing survey-based financial ratios, spreadsheet tools, and consulting services. More research in this vein would benefit all stakeholders. For instance, farmers using organic practices will gain better access to financing if their creditors have a more solid grasp of the financial benchmarks and profitability ratios associated with this type of farming. And policymakers will have a better sense of which farms are returning higher margins of value back to their communities.

### ***Diversify market opportunities for organic dairy farmers – both products and channels***

Maine’s organic dairies can find markets for their high quality products – it just might take some creative marketing and diversification.

The nationwide rise in demand for organic dairy products and subsequent conversion of 66 of Maine’s dairies to organic has undoubtedly been a good thing. But in order for that growth to be sustainable, organic certification alone is not sufficient. Appealing to processors and the public for an increased share of the final shelf price may work in the short-term, but those gains are sure to be temporary and hard-won. MOFGA, along with Maine’s organic dairies, will have to search for ways to diversify their products and sell into higher value, local niche markets. The recent establishment of the MOO brand of milk is good example of this.

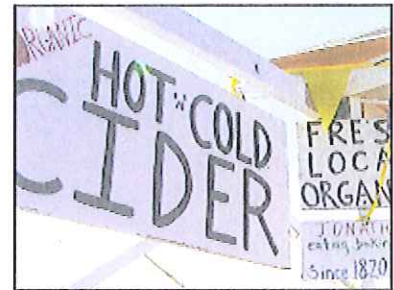
### ***Develop market channels with small and mid-sized grocery stores for local, organic products***

As long as direct farm to consumer sales continue to grow, MOFGA and the Maine Department of Agriculture should continue to aggressively market the farm-direct channel to consumers. But as the “committed base” becomes saturated, their marketing efforts will yield a diminishing return of locavores. The real leverage point for future growth of local agriculture may lie in those grocery stores less than ten miles away from the casually supportive food shopper. In many communi-

ties, this means not just the large grocery chains, but smaller, local chains as well. MOFGA, the Dep't. Of Ag., and other groups will have to work closely with both farmers, and grocery stores to develop channels, and make sure the distribution systems are scaled appropriately so that overhead costs are not prohibitive. This time to invest in these relationships is now, before it becomes a necessity.

***Strengthen alliances between certified farms and non-certified “sustainable” farms.***

While there were 582 organic farms in 2007, there are potentially up to 3,190 farms that might classify themselves as using “sustainable” management practices. Many of these, such as crop rotation, integration of livestock and crops, and direct marketing, closely mirror the practices of organic farming. Primarily, organic and sustainable farmers share the “systems approach” to farming. But organic and sustainable farmers are split by a barrier of branding. MOFGA, by reaching out to and including these non-certified “sustainable” farmers, could expand its support base and political leverage.



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**Summary of Recommendations**

Recommendation	Responsible Parties	Intended Outcome
Continue to purchase local Maine foods from MOFGA-certified farms	Maine communities	More local agriculture, more fresh foods, more farm sector jobs, more community vitality
Develop better financial tools for organic farmers	MOFGA, Maine Dep't. of Ag, farm credit agencies, other research institutions	Will help policymakers understand which segments of the farm community are returning most value to their communities  Will help organic farmers gain better access to credit through increased understanding of profitability thresholds and ratios
Diversify market opportunities for organic dairy farmers – both	MOFGA, organic dairy farmers products and channels	Develop resiliency of organic dairies' revenue streams
Develop market channels with small and mid-sized grocery stores for local, organic products	MOFGA, organic farmers	Increase access to Maine organic produce for non-“locavores”
Strengthen Alliances between certified organic and non-certified “sustainable” farms	MOFGA	Gather non-certified farms using sustainable practices under MOFGA umbrella



*Jean English photo*

## Appendix: A Quick Look at Local and Sustainable Agriculture

**Local Agriculture is also a growing, vibrant force on the Maine farm landscape**

“Local” agriculture refers to a system of marketing and distribution, not production. Farms that sell local often market directly to consumers, via farmstands, farmer’s markets, or community supported agriculture (CSA) shares. Or, they might sell products to local restaurant or grocery store. Or they might sell to a distributor who then relays the product to local restaurants and stores.

Local agriculture is on the rise. The Department of Agriculture report notes a 30% growth rate from 1997 to 2002. From 2002 to 2007, growth continued at 39%. This means they’ve more than doubled in 10 years!

According to the census, Maine farms sold \$18,419,000 worth of food directly to consumers in 2007. Based on data from the Maine Department of Agriculture and a study from the University of Maine,<sup>10</sup> we can estimate that roadside stands and stores make up about 64% of these sales, farmer’s markets 17%, pick-your-own operations 14%, and CSA subscriptions 5%.

There is also some evidence that suggests that Census estimates of direct sales are too low. Because direct food sales are often on a cash basis, it may be that they are underreported. The Maine Department of Agriculture cites surveys taken by the University of Maine to suggest that direct sales might actually be somewhere near \$75,000 – \$100,000.

**Growth in local agriculture is strongly correlated to Maine’s region-by-region population growth.**

The Brookings Institution report opens on an optimistic note: for the first time in a century, Maine’s population is growing. From 2000 to 2005, the state’s annualized population growth was .72%, ranking it up in the top ten states!<sup>11</sup> What’s the reason? The report argues that Maine’s communities and natural resources attract immigrants from other states seeking a higher quality of life. “In-migration from other states means people from outside the state are ‘voting with their feet’ and at least for now rating the state’s quality of life on a par with with faster growing, highly desirable Sun Belt locales. . . the Pine Tree State’s new status as a regional destination bespeaks its high quality of place and provides a welcome opportunity for

progress.” Demographically, these new residents are most likely to be retiring baby boomers, but the report also notes that 25-44 year olds made up a substantial proportion of net arrivals. This could be couples looking to start families in areas where they perceive a better quality of life for their children.

Local agriculture both benefits from and contributes to these factors for population growth. The regions that have experienced strong population growth have also seen the most growth in farmer's markets, roadside stands, CSA's, and other forms of direct farm-to-consumer sales. The correlation between 2000-2005 annual population growth and '02-'07 growth in direct sales is 52%.

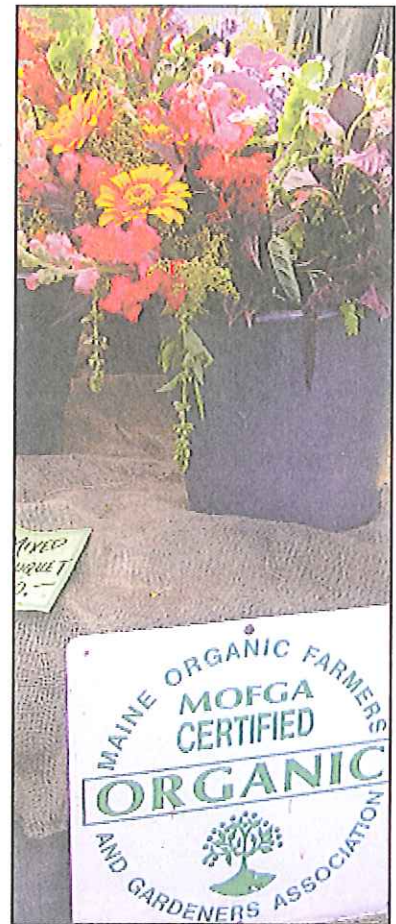
And income alone does not seem to be a driving factor. The correlation between median household incomes and per capita farm-to-consumer sales is mildly negative (-3%). As the Department of Agriculture notes, “A study done in Oregon between a ‘blue collar’ town and a more affluent, socially liberal community showed that both communities were supportive of local agriculture, a finding quite similar to Maine.”<sup>12</sup>

The data indicate that local agriculture may be a significant contributor to a region's quality of life, and may be a contributing factor for people making decisions about where to live. This is especially true in the Mid-Coast area, where population grew at 1% a year and direct market sales leapt up 118%. You might even hear real estate agents boasting about “this town's farmer's market” or “this great farm-stand up the road” to prospective home buyers.

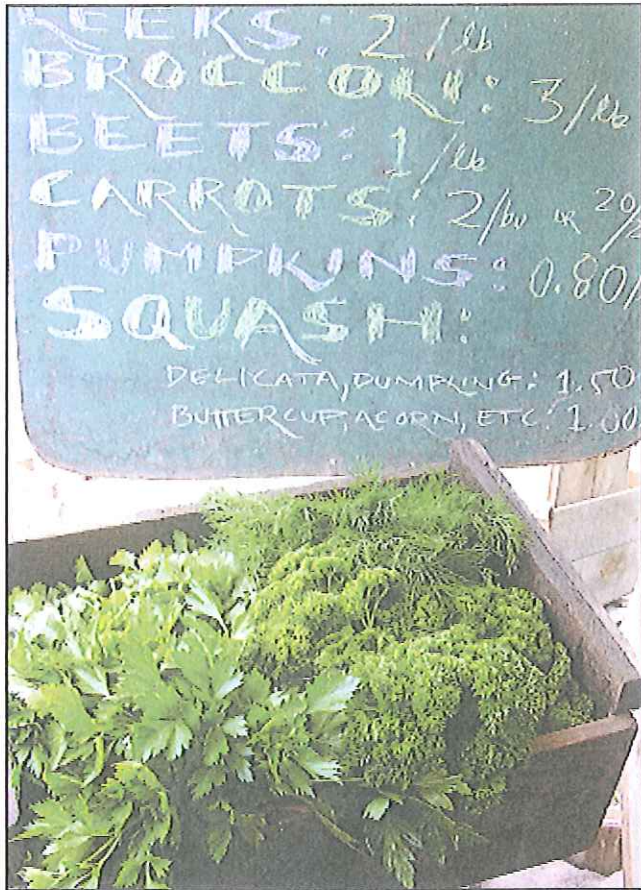
Of course, correlation is not causation – it would be a real reach to say that local agriculture causes people to move to an area. Instead, local agriculture is part of a feedback loop that generates both value and population growth. As more people move to an area, more farms set up shop to cater to them; this creates a local farm “scene” that increases the appeal of the region to prospective immigrants. Notes the Department of Agriculture: “The economy is becoming experience-based and people are looking for products and activities that involve more than just an exchange of goods.” Local agriculture provides these experiences.

**Sustainable agriculture may represent up to 40% of all Maine farms.**

In their large and detailed survey study of Maine farms, “Understanding the Dichotomy Between Industrial Agriculture and Sustainable Agriculture: Types and Characteristics of Maine Farms,” Smith,



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Jean English photo

along with colleagues Pamela Bell and Andrew Files, define sustainable agriculture as representing a system which is, “decentralized, diverse, restrained, in harmony with nature, respectful of community and promotes independence.”<sup>13</sup> An intensive interview process revealed two types of Maine farms that the researchers defined as using “sustainable” management practices.

In one group are the “designer” farms, “operated as holistic, integrated biological systems that the farmer intended (designed) from the beginning . . . relatively small, generally complex with multiple enterprises, relying more on economies of scope than economies of scale, and selling into higher value niches, especially selling direct to consumers.” The second type, the “evolver” farms, are former large-scale, commodity-focused farms that are becoming like the designer farms.

Extrapolating from the survey results, of the 8,136 farms in Maine in 2007, about 3,190 might classify themselves as “designers,” or

“evolvers.” These farmers could produce about \$180.5 million worth of products on about 570,000 acres of land. By these estimates, sustainable farming makes up about 40% of the Maine agriculture scene. Total revenues are somewhat lower (about 30%), but sustainable farms account for 56% of all direct food sales.

## Footnotes

- 1 *The Maine Organic Farmer and Gardener*, Common Ground Fair editions, 2002-2008. MOFGA archives.
- 2 Conversation with Russell Libby, 2/27/09
- 3 This number doesn't sum perfectly with the acres of organic hay, pasture, and cropland presented next. This could be because farmers aren't reporting the pastured woodland, counted as pasture acres, under "acres for organic production."
- 4 Source:<http://www.ers.usda.gov/Data/Organic>
- 5 A job here is defined as farm operators reporting farming as their primary occupation plus employees.
- 6 Dalton, Timothy, et. al. "A Comparative Analysis of Organic Dairy Farms in Maine and Vermont: Farm Financial Information from 2004 to 2006." July 2008: Maine Agriculture and Forest Experiment Station Bulletin #851.
- 7 Abelson, Jenn. "Prices sour demand for organic milk." June 28, 2009. Retrieved from [www.boston.com/business/articles](http://www.boston.com/business/articles).
- 8 "The Agricultural Creative Economy," page 23.
- 9 Smith, Stewart, Bell, Pamela, and Files, Andrew. "Understanding the Dichotomy Between Industrial Agriculture and Sustainable Agriculture: Types and Characteristics of Maine Farms." October 2004: University of Maine.
- 10 The creative agricultural economy study cites University of Maine Staff Paper #563 and adds its own estimate of CSA sales on page 9. The sales data from this study were proportionately correlated to the 2007 Census.
- 11 *Charting Maine's Future*, page 24.
- 12 "The Creative Agricultural Economy." Page 22.
- 13 Smith, Stewart, Bell, Pamela, and Files, Andrew. "Understanding the Dichotomy Between Industrial Agriculture and Sustainable Agriculture: Types and Characteristics of Maine Farms." October 2004: University of Maine.



# National Organic Coalition

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## AFRI Classical Breeding Analysis and Recommendations

June 15, 2011

### NOC MEMBERS

Beyond Pesticides

Center for Food  
Safety

Equal Exchange

Food & Water Watch

Maine Organic  
Farmers and  
Gardeners Association

Midwest Organic and  
Sustainable Education  
Services

National Cooperative  
Grocers Association

Northeast Organic  
Dairy Producers  
Alliance

Northeast Organic  
Farming Association -  
Interstate Council

Organic Seed  
Alliance

Organically Grown  
Company

Rural Advancement  
Foundation  
International -USA

Union of Concerned  
Scientists

*“The greatest service which can be rendered any country is to add a useful plant to its [agri]culture” - Thomas Jefferson*

### Summary

Despite a clear mandate from Congress and significant public input, the USDA National Institute for Food and Agriculture (NIFA) and previously the Cooperative State Research and Education Service (CSREES) has failed to provide real funding for development of public cultivars and animal breeds.

### Background Issue

The last several decades have seen a steady decline in development of new publicly available plant varieties and animal breeds. Although classical breeding provides the most cost effective way to develop new publicly available breeds and cultivars, both public and private institutions are failing to direct research dollars to this critical work. It is estimated that it costs approximately one million dollars to develop a new plant through classical breeding and that genetic modification may cost as little as five million dollars and as much as sixty million dollars<sup>1</sup>

This shift away from breeding for publicly available cultivars and breeds has been closely tied to strengthened intellectual property rights and the now widespread practice of patenting new plant and animal varieties. Private funding has been redirected to other technologies such as genomics, and the scientists have followed. Since scientists in the private sector have little incentive to develop public cultivars and breeds, it is up to our public institutions to fill this role. Yet our public institutions are failing to provide this public good.

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<sup>1</sup> Goodman, Major M., New Sources of Germplasm: Lines, Transgenes, and Breeders, Department of Crop Science. North Carolina State University Raleigh, NC 27695

The impacts of these shifts are significant and are a key factor in our narrowing pool of publicly available germplasm. Lack of agricultural diversity undermines national food security and agricultural stability. By encouraging more uniform agriculture, our crops are more vulnerable to disease and pests. We are also handicapping our ability to adapt to climate change and related changes in precipitation. We are creating an agricultural system that is less agile in responding to economic trends, possibly hindering our global competitiveness. By failing to diversify our crops and livestock, we are failing consumers looking for foods that meet their nutritional needs and taste preferences, and failing farmers looking for locally suitable varieties of plants and animals. Organic farmers and others that rely on markets where GMOs are prohibited or undesirable are particularly affected as they now have fewer choices for commercially available seed.

This shift away from classical breeding has led to deterioration of capacity in our research institutions, including land grant universities. There has been a decline in the number of plant breeders at the State Agricultural Experiment Stations, plant breeding departments at universities are being closed, and we have seen a correlating decline in graduate students being trained in classical breeding methods making it even more difficult to assure our future in this critical scientific field.

The role of the AFRI program in reinvigorating the investment in public sector plant and animal breeding is critical. Addressing obstacles for classical breeders to be competitive is essential to ensuring a diverse and globally competitive food supply

### **Congressional Mandate**

Recognizing the concerns about the decline in public plant and animal breeding, Congress has called on the USDA time and again to make funding for classical plant and animal breeding a priority within the USDA competitive research grant programs. Specifically, Congress has included report language calling on the USDA to prioritize classical breeding in most of the annual appropriation bills in recent years. For example:

*Fiscal Year 2005 Senate Report language: Classical Research.--The Committee notes the substantial increase in public and private sector research related to genomics, genetics, and other breakthrough biotechnology developments. However, this shift in emphasis has resulted in a decline in classical research in the animal and plant sciences. The Committee encourages the Department, especially in the establishment of priorities within the National Research Initiative, to give consideration to research needs related to classical plant and animal breeding.*

*Fiscal Year 2006 Senate Report Language: Classical Research.--The Committee notes the substantial increase in public and private sector research related to genomics, genetics, and*



*other breakthrough biotechnology developments. However, this shift in emphasis has resulted in a decline in classical research in the animal and plant sciences. The Committee encourages the Department, especially in the establishment of priorities within the National Research Initiative, to give consideration to research needs related to classical plant and animal breeding.*

Fiscal Year 2007 Senate Report Language: *Classical Research.--The Committee notes the substantial increase in public and private sector research related to genomics, genetics, and other breakthrough biotechnology developments. However, this shift in emphasis has resulted in a decline in classical research in the animal and plant sciences. The Committee encourages the Department, especially in the establishment of priorities within the National Research Initiative, to give consideration to research needs related to classical plant and animal breeding and directs the Department to establish a specific category of grant application requests for classical plant and animal breeding to foster more diverse, energy efficient, and environmentally sustainable agricultural systems.*

Fiscal Year 2009 Senate Report Language: *Section 7406 of the Food, Conservation, and Energy Act of 2008 specifies priority areas within the newly created Agriculture Food and Research Initiative [AFRI], including an emphasis on conventional (classical) plant and animal breeding. The Committee strongly concurs with the intent of this section, and requests a report from the agency as to its plans for implementing the intent of this important conventional/classical plant and animal breeding requirement.*

Fiscal Year 2010 Senate Report language: *“The Committee recommendation includes \$296,681,000 for the Agriculture and Food Research Initiative [AFRI]. Section 7406 of the Food, Conservation, and Energy Act of 2008 specifies priority areas within the Agriculture and Food Research Initiative [AFRI], including an emphasis on conventional (classical) plant and animal breeding. The Committee strongly concurs with the intent of this section, and requests a report from the agency as to its plans for implementing the intent of this important conventional/classical plant and animal breeding requirement.”*

Such previous recommendations from Congress were seemingly ignored, in 2008 Congress included explicit language in the Food, Conservation, and Energy Act of 2008 (aka the 2008 farm bill) by listing “conventional” breeding within both the “Plant Health and Production and Plant Products” and the “Animal Health and Production and Animal Products” priority areas of AFRI:

*“conventional breeding, including cultivar and breed development, selection theory, applied quantitative genetics, breeding for improved food quality, breeding for improved local adaptation to biotic and abiotic stress, and participatory breeding.”*

Congress further elaborated on these statutory changes in the Statement of Managers which accompanied the bill:

*“The Managers are aware of the importance of supporting public sector conventional plant and animal breeding, as evidenced by the specific mention of this priority under the “plant health and production and plant products” and “animal health and production and animal products” priorities in AFRI. The Managers intend that the term “conventional breeding,” also known as “classical breeding,” refer to breeding techniques which rely on creating an organism with desirable traits through controlled mating and selection. Because conventional breeding is critical to the development of seeds and breeds that are well adapted to local conditions and changing environmental constraints, these efforts are important to the food and agriculture sector. The Managers are aware that participatory breeding programs, where producers are involved in the process of developing new plant varieties and animal breeds, yield varieties and breeds that are better adapted to local environments. The Managers encourage an emphasis on funding of conventional plant and animal breeding as part of the new AFRI.”*

### **Public input**

The sustainable agriculture community has been communicating with the USDA about this issue for years, participating in public comment periods, submitting letters, and scheduling meetings with key REE agency staff. Some examples of letters and written comments are below:

- *September 19, 2008:* Sustainable Agriculture Coalition letter to Dr. Hefferan following USDA Listening Session on AFRI recommending AFRI establish two new national programs for conventional plant and animal breeding beginning with the FY 09 RFA.
- *September 24, 2008:* National Organic Coalition ([NOC](#)) [comments](#) to CSREES on the Agriculture and Food Research Initiative (AFRI) newly authorized in the 2008 Farm Bill regarding the provisions of the Act which specify conventional plant and animal breeding as a priority area of research within AFRI.
- *September 2008:* Union of Concerned Scientists stakeholder comments to CSREES on the Agriculture and Food Research Initiative (AFRI), urging significant funding for classical breeding.
- *April 13, 2009:* Memo to Carol Jett from UCS, NSAC, and OFRF, in follow up to a request made for additional information on the groups’ recommendations for classical breeding.
- *May 31 2009:* National Sustainable Agriculture Coalition letter to Research, Education, and Extension Office (REEO) Directors recommended the USDA REEO Roadmap include increased coordination and major investments in classical plant and animal breeding.

- *September 11, 2009:* National Sustainable Agriculture Coalition written comments on fiscal year 2009 AFRI RFA strongly recommended that two new, separate national programs for conventional plant and animal breeding be established within AFRI, beginning with the FY 10 RFA.
- *September 14, 2009:* Sign-on letter regarding the implementation of the Cooperative State Research, Education, and Extension Service (CSREES) Agriculture and Food Research Initiative (AFRI), as authorized by the 2008 Farm Bill. Signed by: Rural Advancement Foundation, International, National Organic Coalition, ACTIVE, AERO, MT, California Climate and Agriculture Network, Carolina Farm Stewardship Association, Chemung County Council of Churches, Classic Organic, Cornucopia Institute, Crawford Stewardship Project, Ecological Farming Association, Edmonds Institute, Florida Organic Growers, Food and Water Watch, Food for Maine's Future, Friends of ETC Group, Frog Farm, Greenpeace, High Meadows Farm, Institute for Responsible Technology, Just Food, NY, Midwest Organic and Sustainable Education Service, National Family Farm Coalition, National Sustainable Agriculture Coalition, North American Limousin Foundation, Northeast Organic Farming Association of Connecticut, Northeast Organic Farming Association of New York, Northeast Organic Farming Association of Massachusetts, Ohio Ecological Food and Farm Association, Old Solar Farm, Oregon Physicians for Social Responsibility, Organic Farming Research Foundation, Organic Seed Alliance, Organic Seed Growers and Trade Association, Organic Trade Association, Peacework Farm, Rainy Creek Farm, Rocky Mountain Farmers Union, Safe Alternatives for our Forest Environment, The Nature Institute, Union of Concerned Scientists, Washington Biotechnology Action Council, Washington Sustainable Food and Farming Network, Wood Prairie Farm, and an additional 43 individuals.
- *December 7, 2009* In a letter to Dr. Beachy, specific recommendations for Establishment of AFRI Conventional Plant and Animal Breeding Programs were offered by the National Organic Coalition, National Sustainable Agriculture Coalition, Organic Farming Research Foundation, Seeds and Breeds for the 21st Century Coalition, and Union of Concerned Scientists.
- *January 27, 2010:* Letter to Secretary Vilsack, copied to Dr. Kathleen Merrigan, Deputy Secretary; Dr. Molly Jahn, Acting Under Secretary; Dr. Roger Beachy, NIFA Director signed by the National Organic Coalition, National Sustainable Agriculture Coalition, Organic Farming Research Foundation, Rural Advancement Foundation International, and Union of Concerned Scientists urging segregated funding streams in the FY 10 RFA for conventional plant and animal breeding.
- *April 13, 2010:* Union of Concerned Scientists submits written comments for the USDA workshop on stakeholder priorities in the area of Plant and Pest Biology recommending NIFA play a more active role in reinvigorating breeding of public cultivars.
- *June 7, 2010:* Union of Concerned Scientists submits written comments in response to the June 2, 2010 AFRI stakeholder meeting recommending the AFRI FY11 RFA fund classical breeding through a funding line distinct from genomics and other technologies.
- *September 24, 2010:* National Sustainable Agriculture Coalition (NSAC) letter to Secretary Vilsack regarding a resolution adopted at the NSAC meeting. One of the

points in the resolution was that the USDA AFRI needed to increase classical breeding for public cultivars and that this work should be funded through a separate RFA.

- *November 24, 2010: Letter* to Catherine Woteki, (USDA Under Secretary for Research, Education and Economics), regarding the importance of the Agriculture and Food Research Initiative (AFRI) investments in classical plant and animal breeding, signed by the National Organic Coalition, National Sustainable Agriculture Coalition, Organic Farming Research Foundation, Organic Trade Association, Rural Advancement Foundation International, and Union of Concerned Scientists.

Meeting and public listening sessions where concerns about the need for greater focus on classical breeding were expressed include:

- *September 2008*: NOC and UCS met with CSREES Administrator Colleen Hefferan to discuss specific recommendations for increasing competitive grant funding for classical plant and animal breeding.
- *September 15, 2008 AFRI listening session*: Sustainable Agriculture Coalition and National Organic Coalition made comments that addressed the need for classical plant and animal breeding.
- *June 2009*: Meeting with USDA Under Secretary Rajiv Shah – NOC presented him with the 2005 Seeds and Breeds report and had an in-depth discussion of the need for increased public investment in classical breeding.
- *September 2, 2009*: UCS met with Mary Peet, the NPL for Organic Agriculture, to discuss current research needs including classical breeding.
- *November 19, 2009*: UCS staff met with Maura O'Neill, Chief of Staff to USDA Research, Education, and Economics Under Secretary Rajiv Shah, and Jill Auburn, Under Secretary Shah's Advisor on Sustainability to discuss three research areas, one of which was the need for increased investment in classical public plant and animal breeding.
- *November 24, 2009*: NOC, OFRF and NSAC meet with Molly Jahn to discuss classical breeding needs.
- *January 6, 2010*: Sustainable and organic agriculture groups met with REE Undersecretary Catherine Woteki specifically to discuss classical breeding, concerns with the AFRI RFA, and possible solutions.
- *April 13, 2010*: At a USDA research stakeholder meeting, UCS presented on its priorities which included classical breeding.
- *June 2, 2010*: CSREES AFRI Stakeholder listening session comments by the Organic Farming Research Foundation, the National Sustainable Agriculture Coalition, the Union of Concerned Scientists, and the AFRI Coalition, all urged stronger emphasis on classical breeding.
- *November 29, 2010*: NSAC and OFRF met with REE Undersecretary Catherine Woteki and discussed the need for classical breeding, among other things.

- *December 3, 2010*: USDA Under Secretary for REE Woteki Stakeholders Session
- *December 9, 2010*: NSAC and OFRF met with Roger Beachy, NIFA Director, and discussed the importance of classical breeding.
- *January 19, 2011*: NIFA Stakeholders Meeting, during which NSAC and NOC provided comments on classical breeding.
- *April 5<sup>th</sup>, 2011*: UCS met with REE Undersecretary Catherine Woteki and discussed the need for increased classical breeding, among other things.

### **Requests for Proposals**

Despite the clear call from Congress and significant public input for USDA to address our nation's classical plant and animal breeding needs, the AFRI RFAs released since the passage of the 2008 Farm Bill have fallen far short of prioritizing public breed and cultivar development. The Requests for Proposals (RFA) in 2009, 2010 and 2011 all included classical breeding, but put them in the same pool as genomics.

The 2009 RFA stated there was significant opportunity for breeding and mentioned classical breeding specifically in several places. In the Response to Stakeholder Input section the RFA said: *“Conventional plant and animal breeding are receiving greater support in the Plant Breeding and Education Program, Plant Genome, Genetics and Breeding Program, Applied Plant Genomics Coordinated Agricultural Program and in Translational Animal Genomics.”* The Department was acknowledging the concerns and making incremental steps to address them, but failed substantively to do so by lumping classical breeding and the development of publicly available breeds and cultivars with genomics work and/or fundamental research. The problem in the RFA was reflected in the lack of classical breeding projects funded.

The 2010 review had several problems. Specifically, conventional breeding was only mentioned in the Climate Change RFA under National Cereal Germplasm Phenotyping. Although there is a need for breeding to develop cultivars resilient to environmental changes resulting from climate changes, the RFA for this program did not have any focus on development of public cultivars. Although there was good language about participatory plant breeding and organic farming being desirable aspects of a proposal, they were not part of the core needs listed for obtaining a grant. The RFA also failed to fund development of new breeds and cultivars.

The 2011 RFA acknowledged that the 2010 RFA fell short of addressing classical breeding needs and stated that the 2011 RFA was more inclusive of conventional breeding: *“Areas believed to have been under-represented in the FY 2010 RFAs, such as conventional plant and animal breeding, weed science, and food technology are more clearly offered in this FY 2011 RFA ...”*. The RFA included specific reference to cultivar development, but it was relegated to a subheading within the “Biology of Agricultural Plants” subprogram that also includes genomics and biotechnology. The 2011 RFA's “Animal Breeding, Genetics, and Genomics”

was even less specific about classical breeding and again the classical breeding projects competed against other technologies.

### **Analysis**

The combined approach of traditional breeding competing for the same pool of funding as genomics, biotechnology and other breeding technologies is not working. The 2009, 2010 and 2011 AFRI-funded projects (see **Appendices I, II, and III**) include almost no funding for projects focused on actual development of publicly available cultivars and breeds. On the animal side, almost all the research was focused on fertility issues, not development of new breeds. On the plant side, the majority of the projects were fundamental research focused on genomics. Nearly all projects that did actual breeding involve genomics and/or MAS.

Of 127 funded projects in 2009, 2010, and 2011 related to plant breeding and genomics, we were able to identify only one project that was truly classical breeding, a 2010 funded grant: *Development And Management Of Canola In The Great Plains Region* at Kansas State University for \$210,000. Of the 59 projects in animal breeding, fertility and genomics we found no projects that we considered classical animal breeding.

Based on reviewing actual funded projects and anecdotal information from AFRI applicants, it seems that classical breeders are not finding places in the RFAs that are clear homes for their proposals. Also, the classical breeding proposals that are submitted are not considered competitive if they do not contain use of technologies such as MAS or genomics. Research proposals for classical plant and animal breeding that have sought AFRI or NRI funding in the recent years have been consistently declined. Although information on applications is not publicly available, anecdotal evidence suggests that after being consistently denied, breeders are no longer bothering to submit applications.

Funded projects have had a heavy focus on fundamental genomics. Many of these projects provide genome sequencing that they state will be freely available, through on-line data bases and other mechanisms. However, it is our belief that such information will primarily be useful to those breeders using advanced technologies rather than classical breeding.

In livestock breeding, there were a significant number of research projects related to reproductive efficiency, but almost no breeding projects.

By confusing genomics-centered research with true classical breeding, we are hindering the ability of our research community to pursue diverse approaches to problems. Research aimed at breeding animals and development of new, publically held plant cultivars is critical for adapting to climate change, increasing efficiency of energy crops, developing resistance to insect, disease and other plant stresses, and supporting regional diversity. Perhaps most significantly, we are

failing our farmers by not supporting a diverse array of seed and breed choices that may be suited to their region. This failure may have a direct effect of the competitiveness of US agriculture as well as our national food security.

## **Recommendations**

In order to foster a more environmentally sound and economically sustainable agriculture it is critical to significantly increase Agriculture and Food Research Initiative (AFRI) investments in classical plant and animal breeding. To this end, we offer the following recommendations:

1. Create two new NIFA programs with segregated funding streams for conventional plant and animal breeding. These funding streams should be for classical breeding only, and be distinct from other breeding research that utilizes genomics, biotechnology, or MAS. These can be programs within AFRI or separate grant programs, but must be managed as separate research areas with distinct RFAs.
  - a. The RFAs for these programs should each include a clearly stated goal that conventional breeding projects result in the release of publicly held cultivars or breeds.
  - b. Combined, these two programs should have a minimum funding of \$20,000,000 per year.
  - c. Awards under each of these programs should be eligible for projects up to ten years.
  - d. The review panels for both of these programs must include a majority of reviewers with strong demonstrated expertise or experience in classical breeding and public cultivar development.
  - e. At least in the first 5 years of their existence, do not make the RFAs for these two programs should not be commodity specific. The backlog of classical breeding work needed is huge and affects too many sectors to limit requests to only targeted crops or animals.
  - f. Because development of public cultivars and breeds is a public good, serving larger societal goals of diversity and agricultural security, classical breeding projects that propose to develop public cultivars and breeds should be exempted from matching requirements. At a minimum they should be provided more flexible criteria.

- g. Both RFAs should contain language that specifically encourage proposals with participatory breeding and meaningful farmer and NGO participation.
2. Track grants for new public cultivars or improved breeds separately from genomic or molecular genetics activities. In this way, the funding and overall public breeding capacity trends will be more easily monitored and analyzed. This tracking system should be extended to include USDA ARS projects to provide more accurate assessment of overall USDA commitment to public breed and cultivar development.
3. Continue strengthening financial incentives for graduate and undergraduate training in classical plant and animal breeding to ensure the next generation of public plant and animal breeders.

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## APPENDIX I – AFRI Awards Funded in 2009

### Plant Breeding Related Awards

#### Marker Assisted

Project Title	Organization	State	Amount
Simultaneous Genetic Analysis Of Winter Hardiness Traits And Development Of Winter Malting Barley Varieties	Oregon State University	OR	\$448,000
Genomewide Selection To Introgress Exotic Dwarf-Corn Germplasm Into U.S. Corn Belt Germplasm	University Of Minnesota	MN	\$448,000
Evaluating Genomic Selection For Applied Plant Breeding	University Of Minnesota	MN	\$449,000
Expanding The Scope Of Association Mapping In Important Crop Species With Methodology Development In Statistics	University Of Nebraska	NE	\$282,000
Scanning For Yield: High-Throughput Discovery Of Candidate Agronomic Loci For Marker-Assisted Selection In Maize	University Of California, Davis	CA	\$448,000

#### Genomics

Project Title	Organization	State	Amount
Exploiting Antixenosis In Wheat Blends For Improved Pest Management; Management Of Wheat Stem Sawfly Using Oviposition Non-Preference Cultivars	Montana State University	MT	\$320,500
Barley Coordinated Agricultural Project: Leveraging Genomics, Genetics, And Breeding For Gene Discovery And Barley Improvement	University Of Minnesota	MN	\$955,000
Single Nucleotide Polymorphism (Snp) Markers For High-Throughput Genotyping To Advance Genomic, Genetic And Breeding Research In Wheat	Kansas State University	KS	\$441,000
Drought Tolerance And Functional Staygreen In Maize	Purdue University	IN	\$348,321
Improving Alfalfa As A Biofuel Feedstock	University Of Georgia	GA	\$705,000

Genetics And Genomics Of Rapid-Onset Water Stress Tolerance In Tomato	University Of California, Davis	CA	\$349,853
Oat Snp Development And Identification Of Loci Affecting Key Traits In North American Oat Germplasm Using Association Genetics	USDA-ARS	ID	\$450,000

### Classical Breeding

None

### Fundamental Genomics

Project Title	Organization	State	Amount
Understanding The Mechanisms That Define Cereals: Unraveling The Function Of Lineage Specific Genes Within The Poaceae	Michigan State University	MI	\$450,000
Efense Versus Symbiosis: Host Genetic Control Of Nodulation Specificity In Soybean	University Of Kentucky	KY	\$150,000
Comparative Protein Networks Controlling Disease Resistance In Rice And Wheat	University Of California Davis	CA	\$447,000
Molecular Quantitative Genetics Of Forest Trees	University Of Florida Gainesville	FL	\$643,000

### Other

Project Title	Organization	State	Amount
2009 Epigenetics Gordon Conference	Gordon Research Conferences West Kingston, Rhode Island	RI	\$10,000
International Conference On Legume Genomics And Genetics	The Samuel Roberts Noble Foundation, Inc. Ardmore	OK	\$10,000
Strategies For Promoting Reliable Crop Pollination By Native Bees	Rutgers University New Brunswick,	NJ	\$400,000
Support For Junior Scientists To Attend The 9th International Congress On Plant Molecular Biology	University Of Missouri Columbia	MO	\$5,000

Knowledge For Policy: Critical Research For Understanding Potential Impacts Of Abs On Eight Sectors Of Genetic Resources For Food And Agriculture	University Of Illinois Chicago	IL	\$249,994
How Do Western Corn Rootworm Beetles Use Refuge And Transgenic Corn	University Of Illinois Urbana	IL	\$349,936
The World Soybean Congress Viii Conference Proposal	Purdue University	IN	\$10,000
Use Of Non-Wheat Cereal Proteins As Functional Viscoelastic Polymers	Purdue University	IN	

## Animal Genome, Genetics, and Breeding Related Awards

### Animal Genome and Genetics

None

### Fundamental genomics

None

### Classical breeding

None

### Fertility and Other

Project Title	Organization	State	Amount
Tomorrows Poultry: Genomics, Physiology And Well-Being	Agricultural Research Service	AK	\$10,000
Honey Bee Primer Pheromone Regulation Of Colony-Level Reproduction	Texas A&M University	TX	\$344,217
Functional Role Of The Cart Peptide In Control Of Dominant Follicle Selection In Cattle	Michigan State University East Lansing	MI	\$349,782
Swine Genome Sequencing Consortium [Sgsc] Pig Genome Assembly And Annotation Conference	University Of Illinois Urbana	IL	\$10,000
Nutritional Programming Of Puberty In Heifers	Texas A&M University	TX	\$338,086
Developmental Requirements Of Importin Alpha Mediated Nuclear Trafficking In The Porcine Embryo	Purdue University	IN	\$315,000

Transcriptional And Epigenetic Regulation Of Embryonic Development By Gm-Csf	University Of Florida Gainesville	FL	\$349,260
Physiological Roles Of Prostaglandins And Interferon Tau In Conceptus Development And Endometrial Function	Texas A&M Univ College Station	TX	\$349,287
Mechanism Of Progestin Regulation Of Sperm Hypermotility In Southern Flounder	University Of Texas At Austin Port Arkansas	TX	\$325,000
Pregnancy-Induced Chemokine Receptor 4 And Associated Immune Cells: Implication In Vascularization And Formation Of The Bovine Placentome.	Colorado State University, Ft. Collins	CO	\$125,000
Function And Regulation Of Prr15 In Sheep Conceptus Development	Colorado State University Fort Collins	CO	\$340,000

## APPENDIX II – AFRI Awards Funded in 2010

### Plant Breeding Related Awards

#### Marker Assisted

Project Title	Organization	State	Amount
Conifer Translational Genomics Network	University Of California Davis	CA	\$1,250,000
An Integrated Approach To Breeding Resistance To Phytophthora Capsici In Pepper	University Of California Davis	CA	\$500,000
Marker-Assisted Breeding To Enhance Disease Resistance In Corn, Rice, And Sugarcane	Louisiana State University Baton Rouge	LA	\$499,857

#### Genomics

Project Title	Organization	State	Amount
Investigation Of Branched-Chain Amino Acid Metabolism Involved In Aroma Formation In Melon	University Of California Davis	CA	\$297,000
Cell-Type Specification In The Embryo Sac Of Rice	University Of California Davis		\$349,964
Advancing The Barley Genome	University Of California Riverside	CA	\$500,000
Regulation Of The Maize Mir172 Microrna And Its Targets By Gibberellic Acid	USDA-ARS-WRRC Albany	CA	\$347,555
Lam1 Is A Wuschel-Like Homeobox Gene Regulating Formation Of Leaf Blades	Connecticut Agricultural Experiment Station New Haven	CT	\$125,753
Directing The Metabolic Flux Towards Overexpression Of Flavonoid Nutraceuticals In American Native Grapes.	Florida A&M University	FL	\$125,000
Advanced Pine Breeding Through Association Genetics And Biotechnology	University Of Florida Gainesville	FL	\$499,386
Improving Salt Stress Tolerance In Tomato By Engineering A Ubiquitination Resistant Transcription Factor	University Of Idaho Moscow	ID	\$148,831

Improving Soybean Production In Elevated Ozone: Selecting Genotypes And Understanding Mechanisms Of Tolerance In The Field	USDA ARS Urbana	IL	\$349,670
New Vistas In Plant Breeding Education: Investigating The Genetics Underlying The Ability To Yield Under High Planting Density In Maize	University Of Illinois Urbana	IL	\$500,000
Genome Sequence For Phaseolus	Purdue University	IN	\$497,000
Translating Solanaceae Sequence Diversity And Trait Variation Into Applied Outcomes Through Integrative Research, Education, And Extension	Michigan State University East Lansing	MI	\$1,250,000
Building Expertise In Plant Breeding That Focuses On Drought Tolerance In Common Bean	Michigan State University East Lansing	MI	
<i>The Role Of Soybean G-Proteins In Hormonal Regulation Of Growth And Development</i>	University Of Missouri Columbia	MO	\$348,889
Development Of Bio-Based Lubricants In A Dedicated Industrial Oilseed Crop	University Of Nebraska	NE	\$500,000
Common Bean Coordinated Agricultural Project	North Dakota State University Fargo	ND	\$1,000,000
Assessing The Cost Of Pyramiding Host Resistance To Biotic Stress In Crop Species	South Dakota State University Brookings	SD	\$499,315
Improving Drought Tolerance And Aflatoxin Resistance In Maize; Education, Extension, And Translational Breeding Via Altered Lipid Metabolism	Texas A&M University College Station	TX	\$499,994
Genomics Of Energy Sorghum Biomass Accumulation	Texas A&M University College Station	TX	\$1,000,000
Enhancing Leaf Spot Resistance In Peanut	University Of Florida Gainesville	FL	\$497,748

### Fundamental Genomics

Project Title	Organization	State	Amount
Development Of A High Resolution Snp Chip (600k) And Genotyping Of 850 Diverse Rice ( <i>Oryza Sp.</i> ) Accessions	Cornell University Ithaca	NY	\$500,000

Gibberellin Signaling And Parthenocarpic Fruit Development In Tomato	Duke University Durham	NC	\$350,000
Mechanisms Of Ethylene And Auxin Cross Talk In Root Development	Wake Forest University Winston-Salem	NC	\$349,999
Effectors Of Pathogenicity In The Stagonospora Nodorum-Wheat Pathosystem, Characterization Of How S. Nodorum Induces Disease	USDA-ARS Fargo	ND	\$399,000
Gene Flow And Fitness Studies Of Switchgrass: Implications For New Biofuel Crops	Ohio State University Columbus	OH	\$400,000
Understanding Virus Cell-To-Cell Movement And Its Application To Virus Resistance In Plants	The Samuel Roberts Noble Foundation, Inc. Ardmore	OK	\$399,000
The Douglas-Fir Climate Change Transcriptome Observatory For The Pacific Northwest	Forest Service Corvallis	OR	\$454,545
Transcriptomic Determination Of Genes Involved In The Nutritional Ecology Of Fall Armyworm Plant Host Strains	Pennsylvania State University University Park	PA	\$99,500
Seed Grant To Assess The Role Of Specific, Highly Abundant Viral Small Rnas In Viral Pathogenesis In Corn	University Of South Carolina Columbia	SC	\$150,000
Characterization Of Root Proteomes For Drought And Salt Tolerance In Wild Tomato Species	Tennessee State University Nashville	TN	\$124,552
Linking The Genetic Loci In Wheat That Regulate The Distinct Wax Cuticle Layers And Its Variable Composition To Improved Drought Tolerance	Texas A&M Univ College Station	TX	\$349,078
Pseudomonas Syringae Induction Of Host Programmed Cell Death Through The Regulation Of The Tomato Protein Kinase Adi3	Texas A&M Univ College Station	TX	\$399,000
Improving Plant Productivity By Altering Nitrogen Transport Processes	Washington State University Pullman	WA	\$350,000
Genetic Variation In Dalmatian Toadflax Performance And Defense Traits And Phenotypic Plasticity In Response To Herbivory And Competition	Colorado State University Fort Collins	CO	\$124,962
The Role Of A Novel Apomixis-Linked Ap2-Domain Transcription Factor In Parthenogenetic Embryo Development	University Of Georgia Athens	GA	\$350,000

Deciphering Proanthocyanidin Biosynthesis In Alfalfa	The Samuel Roberts Noble Foundation, Inc. Ardmore	OK	\$336,000
Single-Step National Evaluation Using Phenotypic, Full Pedigree And Genomic Information	University Of Georgia Athens	GA	\$388,343
Function Of Rhamnogalacturonan-I In Tomato Cell Walls	Purdue University		\$350,000
Biochemistry Of Oilseeds: New Strategies For Improving Oils	Washington State University Pullman	WA	\$350,000
Investigations Into The Genetic And Physiological Mechanisms Of Aluminum Tolerance In Rice (Oryza Spp.)	Boyce Thompson Institute Ithaca	NY	\$350,000

### Classical Breeding

Project Title	Organization	State	Amount
Development And Management Of Canola In The Great Plains Region	Kansas State University Manhattan	KS	\$210,000

### Other

Project Title	Organization	State	Amount
Interdisciplinary Graduate Research For The Production And Marketing Of Oilseed Biofuel Products	Colorado State University Fort Collins	CO	\$500,000
Aba And Oxygen Crosstalk During Seed Development	University Of Connecticut Storrs	CN	\$135,000
A Multigenerational Assessment Of The Fate And Impact Of Crop Gene Introgression Into Wild Sunflower	University Of Georgia Res Foundation Athens	GA	\$400,000
Dissection Of The Molecular Mechanisms Regulating Wood Formation In Poplar	University Of Georgia Athens	GA	\$349,658



Translational Genomic Approaches For Enhancing Disease Resistance In Plants, An Internet-Facilitated Education Program For Training Plant Breeders	University Of Georgia Athens	GA	\$499,884
Undergraduate Training And Research In Plant Breeding	Western Illinois University Macomb	IL	\$500,000
Partnership For Research & Education In Plant Breeding And Genetics	Purdue University		\$497,672
Biochemical Processes Governing The Balance Of Metabolic Flux To Amino Acids, Proteins, And Starch Stored In Maize Grain	Iowa State University Ames	IA	\$350,000
Role Of Histone H3 Lysine 36 Methylation In Regulating Developmentally Important Genes In Rice	Mississippi State University Mississippi State	MS	\$134,815
<i>The Role Of Cytokinin Signaling And Type-B Response Regulators In The Apical Meristems Of Arabidopsis And Rice</i>	Dartmouth College	NH	\$125,000
Enhancing Education And Research In Breeding For Plant Disease Resistance	Cornell University Ithaca	NY	\$499,392
10th Japan-US Seminar: Genome Enabled Integration Of Research In Plant-Pathogen Systems.	Oregon State University Corvallis	OR	\$5,000
Collection And Evaluation Of Ornamental, Flowering And Nursery Plants For Adaptation In The Lower Mississippi Delta Region	University Of Arkansas Pine Bluff	AR	\$173,568

## Animal Genome, Genetics, and Breeding Related Awards

### Animal Genome and Genetics

Project Title	Organization	State	Amount
Whole Genome Sequencing Of Catfish	Auburn University	AL	\$800,000
Mining Hymenoptera Genomes For Functional Sequences	Georgetown University	DC	\$704,044
Use Of High-Density Snp Genotyping For Genetic Improvement Of Livestock	Iowa State University Ames	IA	\$449,939
Implementation Of Whole Genome Selection In The Us Dairy And Beef Cattle Industries	USDA, ARS, ANRI, Bovine Functional Genomics Laboratory Beltsville	MD	\$625,000

Turkey Genomic Research And Genetic Improvement: Development Of High-Density Snp Content For Design Of A Genome-Wide Assay	USDA, ARS, ANRI, Bovine Functional Genomics Laboratory Beltsville	MD	\$341,755
Utilization Of Linkage Disequilibrium For Development Of Low Density Single Nucleotide Polymorphism (Snp) Panels To Genotype Domestic Pig Breeds	Michigan State University East Lansing	MI	\$443,491
Development And Field Evaluation Of Genome-Wide Marker-Assisted Selection (Gwmas) Over Multiple Generations In Commercial Poultry	Midwest Area, Agricultural Research Service East Lansing	MI	\$625,000

### **Fundamental Genomics**

<b>Project Title</b>	<b>Organization</b>	<b>State</b>	<b>Amount</b>
Assembly Of The Ovine Whole Genome Reference Sequence	Utah State University Logan	UT	\$930,000
Effects Of Variation In Pathogen Detection And Signaling Pathways On Resistance To Bovine Mastitis	University Of Vermont Burlington	VT	\$360,000
Reference Genome Sequence For The Turkey, Meleagris Gallopavo	Virginia Polytechnic Institute Blacksburg	VA	\$908,280
Mechanisms Mediating The Regulation Of Fatty Acid Synthesis By Fibroblast Growth Factor-19 In Chickens	West Virginia University Research Corp. Morgantown	WV	\$350,000
Across-Breed Comparison Of Genomics Of Host Susceptibility To Infection By Mycobacterium Avium Subsp. Paratuberculosis.	University Of Wisconsin Madison	WI	\$449,747
Genomic Structure And Function Of The Bovine Y-Chromosome Genes In The Male-Specific Region	Pennsylvania State University University Park	PA	\$450,000
Impact Of Maternal Nutrition On Expression Of Genes Regulating Offspring Growth, Carcass Composition, And Meat Quality.	South Dakota State University Brookings	SD	\$319,883
Whole Genome Functional Analyses In Horses To Dissect Important Diseases	Texas A&M University College Station,	TX	\$597,902

Identifying Porcine Genes And Gene Networks Involved In Effective Response To Prrs Virus Using Functional Genomics And Systems Biology	USDA-ARS Animal Parasitic Diseases Lab Beltsville	MD	\$749,975
Fase: Genetic Characterization Of Absolute Varroa Mite Resistance In Honey Bees	University Of North Carolina Greensboro	NC	\$136,463

### Classical breeding

None

### Fertility and Other

Project Title	Organization	State	Amount
Improving Fertility During Heat Stress In Lactating Dairy Cows	University Of Florida Gainesville	FL	\$1,000,000
Advancing Technology For Practical Use Of Cryopreserved Boar Sperm To Improve Opportunities For Profitable Pork Production	University Of Illinois Urbana	IL	\$900,000
The Physiological Basis Of Differences In Efficiency, Metabolism And Energy Partitioning Between Lines Of Pigs Selected For Residual Feed Intake	Iowa State University Ames	IA	\$349,421
Aspen Perinatal Biology Symposium: Intrauterine Stress And Adverse Fetal Outcomes: Linked By Perinatal Mechanisms Of Adaptation	North Dakota State University Fargo	ND	\$10,000
An Integrated Approach To Improving Dairy Cow Fertility	University Of Wisconsin Madison	WI	\$1,000,000
The Next Generation Bovine Genome Database	Georgetown University	DC	\$970,000
Easily Accessible Web-Based Tools For Analyzing Next-Generation Sequencing Data From Agricultural Animals	Michigan State University East Lansing	MI	\$689,921

## APPENDIX III – AFRI Awards funded in 2011

### Plant Breeding Related Awards

#### Marker Assisted

Project Title	Organization	State	Amount
Improving Barley And Wheat Germplasm For Changing Environments	University of California Davis	CA	\$5,000,000
Analysis Of Clinal Variation In Maize: Implementation Of An Experimental Framework For Studying Crop Adaptation	University Of Delaware Newark	DE	\$1,749,707

#### Genomics

Project Title	Organization	State	Amount
Loblolly Pine Genome Project	University of California Davis	CA	\$2,925,000
Enhancing Photosynthesis By Modifying Carbon Allocation	Colorado State University	CO	\$408,795
Engineering High Value Oil Production Into Biofuel Crops	University Of Kentucky	KY	\$199,373
Reducing Losses To Potato And Tomato Late Blight By Monitoring Pathogen Populations, Improved Resistant Plants, Education, And Extension	University of California Riverside	CA	\$1,800,000
Adapting Kernel Metabolism To Enhance Cereal Yield Under Adverse Conditions	University Of Florida Gainesville	FL	\$1,999,998
<i>The Impacts Of Lignin Modification On Fungal Pathogen And Insect Interactions In Sorghum For Cellulosic And Thermal Bioenergy</i>	USDA Agricultural Research Service Lincoln	NE	\$194,626
Evaluation And Mitigation Of Anthracnose Disease Pressure Due To The Introduction Of Sorghum For Feedstock Production	Pennsylvania State University University Park	PA	\$199,548
<i>Genetic Engineering For Septoria Disease Resistance In Hybrid Poplar</i>	Clemson University	SC	\$149,861
<i>Integrated Management Of Oomycete Diseases Of Soybean And Other Crop Plants</i>	Virginia Polytechnic Institute Blacksburg	VA	\$1,856,250

Management Of Switchgrass Rust Disease By Deploying Host Resistant Genes And Monitoring Dynamics Of Pathogen Populations	Virginia Polytechnic Institute	VA	\$200,000
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### Classical Breeding

None

### Fundamental Genomics

Project Title	Organization	State	Amount
Light Regulatory Networks Connecting Phytochromes & Photoperiod In Wheat Development	University of California Davis	CA	\$499,607
Identification Of Genes Controlling Disease Resistance To Mitigate Disease Pressure Of Bioenergy Crops	University of California Davis	CA	\$199,984
Epigenetic Regulation Of Seed Maturation And Germination In Soybean	University of California Riverside	CA	\$500,000
Regulatory Networks Controlling Hormone Signaling During Woody Growth Of Forest Trees	USDA Forest Service	CA	\$498,875
Cell Type-Specific Epigenetic Gene Regulation In The Maize Endosperm During Seed Development	University Of Florida	FL	\$480,153
Analysis Of Imprinted Genes With Developmental Functions In The Maize Seed	University Of Florida	FL	\$499,320
Epigenetic Regulation Of The B3 Transcription Factor Network In Maize Seed Development	University Of Florida	FL	\$499,048
Transcriptome Analysis Of The Photoperiodic Response On The Flowering Gene Networks In Soybean	University Of Illinois	IL	\$499,983
Adaptive Responses Of The Maize Epigenome To Selection For Improved Nitrogen Utilization	University Of Illinois	IL	\$499,983
Insect Effectors In Molecular Plant-Insect Interactions	Purdue University	IN	\$453,658
Environmentally Induced Directed And Stochastic Epigenomic Changes In Maize	University Of Minnesota	MN	\$499,538

The Role Of SWI/SNF Chromatin Remodeling Complexes In The Regulation Of Grain Filling In Rice ( <i>Oryza Sativa</i> )	Mississippi State University	MS	\$498,215
Mitigating Insect Herbivory Of Warm-Season Bioenergy Grasses Getting Ahead Of The Curve	USDA-ARS	NE	\$199,548
Hormone Regulatory Networks In Maize Growth And Development	Cold Spring Harbor Laboratory	NY	\$496,716
Epigenetic Regulation Of Water-Use-Efficiency Related Genes In Tomato	Augustana College	SD	\$58,832
Molecular, Physiological, And Agronomic Characterization Of Salt Tolerant Alfalfa Germplasm	USDA-ARS	UT	\$0
Regiospecific Synthesis Of High-Value Cellulosic Esters And Ethers From Biomass	Virginia Polytechnic Institute	VA	\$181,994
Plant Genotypes To Mitigate Human Bacterial Pathogens	University Of Wisconsin	WI	\$499,993
Functional Genomics Of Salmonella-Tomato Interaction And Crop Driven Pathogen Limitation: The Role Of Agricultural Practices In Outcomes	University Of Florida Gainesville	FL	\$499,531
Integrating Research, Education And Extension For Enhancing Southern Pine Climate Change Mitigation And Adaptation	University Of Florida Gainesville	FL	\$4,000,000
Molecular Mechanisms Underlying The Interactions Of Enteric Pathogens With Postharvest Leafy Vegetables	Illinois Institute Of Technology Chicago	IL	\$499,685
Plant-Microbe Communication In The <i>Medicago Truncatula</i> Rhizosphere: Functional Metagenomics, Biochemistry, And Community Analysis	University Of Kentucky Lexington	KY	\$452,000
Bioinformatics Tools For Interpreting Snp-Phenotype Relationships	University Of Minnesota St Paul	MN	\$495,050
Regulation Of Shb1 On Canola Seed Development And Seedling De-Etiolation	University Of Minnesota St Paul	MN	\$500,000
<i>Mitigating Insect Herbivory Of Warm-Season Bioenergy Grasses Getting Ahead Of The Curve</i>	Agricultural Research Service Lincoln	NE	\$199,548
Hormone Regulatory Networks In Maize Growth And Development	Cold Spring Harbor Laboratory	NY	\$496,716



Role Of Two-Component Elements In Cytokinin Signaling In Rice	University Of North Carolina Chapel Hill	NC	\$499,680
<i>Plant Detection Of Herbivore Cues: A Comparative Approach Towards Understanding Host Evasion</i>	Pennsylvania State University University Park	PA	\$456,929
<i>Molecular, Physiological, And Agronomic Characterization Of Salt Tolerant Alfalfa Germplasm</i>	Agricultural Research Service Logan	UT	\$0
<i>Plant Genotypes To Mitigate Human Bacterial Pathogens</i>	University Of Wisconsin Madison	WI	\$499,993

#### Other

<b>Project Title</b>	<b>Organization</b>	<b>State</b>	<b>Amount</b>
Gordon Research Conference On Quantitative Genetics And Genomics: From Genome To Phenotype	Gordon Research Conferences West Kingston	RI	\$10,000
Co2 Assimilation In Plants: Genome To Biome - A Gordon Research Conference	Gordon Research Conferences West Kingston	RI	\$10,000
<i>Equipping South Dakota State University Beef Research Facilities With Individual Feeding Units To Study Genotype By Nutrition Interactions</i>	South Dakota State University Brookings	SD	\$48,914
<i>An Economic Analysis Of Productivity, Technology Adoption And Profitability: The Impact Of Biotechnology On Agriculture</i>	University Of Wisconsin Madison	WI	\$292,112

### Animal Genome, Genetics, and Breeding Related Awards

#### Animal Genome and Genetics

<b>Project Title</b>	<b>Organization</b>	<b>State</b>	<b>Amount</b>
Adapting Chicken Production To Climate Change Through Breeding	University Of Delaware Newark	DE	\$831,200



<i>National Program For Genetic Improvement Of Feed Efficiency In Beef Cattle</i>	University Of Missouri Columbia	MO	\$1,000,000
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### **Fundamental Genomics**

<b>Project Title</b>	<b>Organization</b>	<b>State</b>	<b>Amount</b>
Store-Operated Calcium Entry In Pig Oocytes	Purdue University	IN	\$499,937
Improving Nutrient Utilization And Feed Efficiency Through Research And Extension To Enhance Pig Industry Sustainability And Competitiveness	Iowa State University Ames	IA	\$938,043
Statistical Methods And Bioinformatics Tools For Multiple Trait Whole Genome Precision Selection For Heterogeneous Environments	Michigan State University East Lansing	MI	\$677,108
<i>Bovine Sperm Transcriptome: Sequencing And Translation In The Bovine Embryo</i>	University Of Rhode Island	RI	\$150,000
<i>Integrated Program For Reducing Brdc In Beef And Dairy Cattle</i>	Texas A&M University College Station	TX	\$1,950,000
<i>Generation Of A High Density Snp Chip For Genomic Analysis In Rainbow Trout</i>	USDA- ARS Kearneysville	WV	\$678,000
<i>Inferring Causal Phenotype Networks In Livestock Using Genomic Information</i>	University Of Wisconsin Madison	WI	\$467,290

### **Classical breeding**

None

### **Fertility and Other**

<b>Project Title</b>	<b>Organization</b>	<b>State</b>	<b>Amount</b>
<i>Endocrine Action Of Interferon-Tau</i>	Colorado State University Fort Collins	CO	\$499,937
Functional Analysis Of Oviductal Glycans That Bind Porcine Sperm	University Of Illinois Urbana	IL	\$396,826
Swine In Biomedical Research Conference 2011: Creating The Building Blocks - Genomics, Transgenesis And Cloning	University Of Illinois Urbana	IL	\$10,000

Knowledge Representation Resources For Animal Agricultural Researchers	Mississippi State University	MI	\$733,845
Ubiquitin Dependent Proteolysis In Farm Animal Spermatogenesis And Fertilization	University Of Missouri Columbia	MO	
<i>Induced Ungulate Trophoblast Stem Cells: Derivation From Fibroblasts</i>	University Of Missouri Columbia	MO	\$341,252
<i>Pregnancy-Induced Chemokine Receptor 4 And Associated Immune Cells: Implication In Vascularization And Formation Of The Bovine Placentome</i>	New Mexico State University Las Cruces	NM	\$69,554.43
A Gene-Based, Quantitative Definition Of Semen Quality	Oregon State University Corvallis	OR	\$498,286
<i>Poultry Workshop: Plant &amp; Animal Genome Conference Xix</i>	Texas A&M University College Station	TX	\$17,000
<i>System Biology Analysis And Modeling Of Complex "Omic" Data: A Service Center Approach</i>	Texas A&M University College Station	TX	\$749,891
<i>Trophoblast-Derived, Non-Classical Mhc Class I Proteins: Essential Factors For The Maintenance Of Bovine Pregnancy</i>	Utah State University Logan	UT	\$486,870
<i>Control Of Oxidative Stress During Bovine Folliculogenesis</i>	Middlebury College	VT	\$150,000
<i>Regulation Of Corpus Luteum Lifespans: Developmental Differences In Signal Transduction Mechanisms Associated With The Luteal Pgf2a Receptor</i>	West Virginia University Morgantown	WV	\$191,172
<i>Arginine And Secreted Phosphoprotein 1 Mediate Mtor Cell Signaling For Conceptus Development And Survival</i>	Texas A&M University College Station	TX	\$500,000
<i>Mechanism Of Gonadotropin Action</i>	University Of Nebraska Medical Center	NW	\$500,000

# **AFRI Classical Breeding Analysis and Recommendations**

## **Public Input Documents List**

1. *September 19, 2008*: Sustainable Agriculture Coalition letter to Dr. Hefferan following USDA Listening Session on AFRI recommending AFRI establish two new national programs for conventional plant and animal breeding beginning with the FY 09 RFA.  
[http://www.nationalorganiccoalition.org/policycomments/2008\\_09\\_24\\_SAC%20Comments%20on%20AFRI%20Implementation.pdf](http://www.nationalorganiccoalition.org/policycomments/2008_09_24_SAC%20Comments%20on%20AFRI%20Implementation.pdf)
2. *September 24, 2008*: National Organic Coalition (NOC) comments to CSREES on the Agriculture and Food Research Initiative (AFRI) newly authorized in the 2008 Farm Bill regarding the provisions of the Act which specify conventional plant and animal breeding as a priority area of research within AFRI.  
<http://www.nationalorganiccoalition.org/AFRIwrittencommentsFINAL9-24-08.pdf>
3. *September 2008*: Union of Concerned Scientists stakeholder comments to CSREES on the Agriculture and Food Research Initiative (AFRI), urging significant funding for classical breeding.  
<http://www.nationalorganiccoalition.org/policycomments/UCS%202008%20AFRIstakeholderCommentsCSREESFinal.pdf>
4. *April 13, 2009*: Memo to Carol Jett from UCS, NSAC, and OFRF, in follow up to a request made for additional information on the groups' recommendations for classical breeding.  
<http://www.nationalorganiccoalition.org/policycomments/Memo%20to%20Carole%20Jett%204%2014%2009.pdf>
5. *May 31 2009*: National Sustainable Agriculture Coalition letter to Research, Education, and Extension Office (REEO) Directors recommended the USDA REEO Roadmap include increased coordination and major investments in classical plant and animal breeding.  
[http://www.nationalorganiccoalition.org/policycomments/2009\\_05\\_31nsac-reeo-roadmap-comments.pdf](http://www.nationalorganiccoalition.org/policycomments/2009_05_31nsac-reeo-roadmap-comments.pdf)
6. *September 11, 2009*: National Sustainable Agriculture Coalition written comments on fiscal year 2009 AFRI RFA strongly recommended that two new, separate national programs for conventional plant and animal breeding be established within AFRI, beginning with the FY 10 RFA.  
[http://www.nationalorganiccoalition.org/policycomments/2009\\_09\\_11\\_NSAC%202009%20AFRI%20RFA%20Comments.pdf](http://www.nationalorganiccoalition.org/policycomments/2009_09_11_NSAC%202009%20AFRI%20RFA%20Comments.pdf)
7. *September 14, 2009*: Sign-on letter regarding the implementation of the Cooperative State Research, Education, and Extension Service (CSREES) Agriculture and Food Research Initiative (AFRI), as authorized by the 2008 Farm Bill. Signed by: Rural Advancement Foundation, International, National Organic Coalition, ACTIVE, AERO, MT, California Climate and Agriculture Network, Carolina Farm Stewardship Association, Chemung County Council of Churches, Classic Organic, Cornucopia Institute, Crawford Stewardship Project, Ecological Farming Association, Edmonds Institute, Florida Organic Growers, Food and Water Watch, Food for Maine's Future, Friends of ETC Group, Frog Farm, Greenpeace, High Meadows Farm, Institute for Responsible Technology, Just Food, NY, Midwest Organic and

Sustainable Education Service, National Family Farm Coalition, National Sustainable Agriculture Coalition, North American Limousin Foundation, Northeast Organic Farming Association of Connecticut, Northeast Organic Farming Association of New York, Northeast Organic Farming Association of Massachusetts, Ohio Ecological Food and Farm Association, Old Solar Farm, Oregon Physicians for Social Responsibility, Organic Farming Research Foundation, Organic Seed Alliance, Organic Seed Growers and Trade Association, Organic Trade Association, Peacework Farm, Rainy Creek Farm, Rocky Mountain Farmers Union, Safe Alternatives for our Forest Environment, The Nature Institute, Union of Concerned Scientists, Washington Biotechnology Action Council, Washington Sustainable Food and Farming Network, Wood Prairie Farm, and an additional 43 individuals.

<http://www.nationalorganiccoalition.org/AFRI9-14.pdf>

8. *December 7, 2009* In a letter to Dr. Beachy, specific recommendations for Establishment of AFRI Conventional Plant and Animal Breeding Programs were offered by the National Organic Coalition, National Sustainable Agriculture Coalition, Organic Farming Research Foundation, Seeds and Breeds for the 21st Century Coalition, and Union of Concerned Scientists. <http://www.nationalorganiccoalition.org/policycomments/Beachy%2012-7-09.pdf>
9. *January 27, 2010*: Letter to Secretary Vilsack, copied to Dr. Kathleen Merrigan, Deputy Secretary; Dr. Molly Jahn, Acting Under Secretary; Dr. Roger Beachy, NIFA Director signed by the National Organic Coalition, National Sustainable Agriculture Coalition, Organic Farming Research Foundation, Rural Advancement Foundation International, and Union of Concerned Scientists urging segregated funding streams in the FY 10 RFA for conventional plant and animal breeding. <http://www.nationalorganiccoalition.org/policycomments/AFRI%20classical%20breeding%20letter%20to%20Vilsack%201-27-10.pdf>
10. *April 13, 2010*: Union of Concerned Scientists submits written comments for the USDA workshop on stakeholder priorities in the area of Plant and Pest Biology recommending NIFA play a more active role in reinvigorating breeding of public cultivars. <http://www.nationalorganiccoalition.org/policycomments/Brise%20comments%20to%20NIFA%20on%20research%204-13-10.pdf>
11. *June 7, 2010*: Union of Concerned Scientists submits written comments in response to the June 2, 2010 AFRI stakeholder meeting recommending the AFRI FY11 RFA fund classical breeding through a funding line distinct from genomics and other technologies. <http://www.nationalorganiccoalition.org/policycomments/UCS%20stakeholder%20comments%20on%20AFRI%20written%206-7-10.pdf>
12. *September 24, 2010*: National Sustainable Agriculture Coalition (NSAC) letter to Secretary Vilsack regarding a resolution adopted at the NSAC meeting. One of the points in the resolution was that the USDA AFRI needed to increase classical breeding for public cultivars and that this work should be funded through a separate RFA. [http://www.nationalorganiccoalition.org/policycomments/2010\\_09\\_24\\_NSAC\\_AFRI\\_letter.pdf](http://www.nationalorganiccoalition.org/policycomments/2010_09_24_NSAC_AFRI_letter.pdf)

13. *November 24, 2010*: Letter to Catherine Woteki, (USDA Under Secretary for Research, Education and Economics), regarding the importance of the Agriculture and Food Research Initiative (AFRI) investments in classical plant and animal breeding, signed by the National Organic Coalition, National Sustainable Agriculture Coalition, Organic Farming Research Foundation, Organic Trade Association, Rural Advancement Foundation International, and Union of Concerned Scientists.

[http://www.nationalorganiccoalition.org/policycomments/2010\\_AFRIWotekiletter.pdf](http://www.nationalorganiccoalition.org/policycomments/2010_AFRIWotekiletter.pdf)

September 16, 2011

The Honorable Thomas Vilsack  
Secretary of Agriculture  
U.S. Department of Agriculture  
1400 Independence Avenue, S.W.  
Washington, D.C. 20250

**Re: Responsible Regulation of Genetically Engineered Crops**

Dear Secretary Vilsack:

On behalf of the undersigned organizations that represent American farmers, consumers, and retailers, we ask you to implement your authority under the Plant Protection Act of 2000 (PPA) to fully protect the public health, the environment, and the economic interests of the United States. This authority should be implemented through responsible, fair, and comprehensive regulations to help prevent further damage to lucrative and important U.S. and international markets, to ensure farmer profitability and rural economic development, and to support environmental protection and consumer choice.

The USDA is currently relying on biotechnology regulations first established almost twenty-five years ago in 1987. Since then, the use of genetically engineered (GE) crops has become widespread, and GE crops and associated traits have become more complex. In 2000, Congress passed the PPA, recognizing the need for a more robust and modern regulatory framework governing the assessment and release of GE crops into the environment and the food supply. USDA's Animal and Plant Health Inspection Service (APHIS) has been working on regulations to implement the PPA since 2004. However, to date the Agency has yet to issue these critical regulations.

We support the promulgation of a comprehensive rule implementing the PPA that uses the statute's broad statutory authority in a responsible, balanced way. The needed rule must:

**1. Regulate all GE crops.**

APHIS must retain oversight of genetically engineered crops as the technology progresses. While not perfect, process-based regulations offer the best way to ensure responsible control of an ever-changing technology. There simply is not the knowledge to determine which crops are safe (and thus can be exempted from regulation) prior to a safety review. In addition, it has become clear that familiar GE crops once regarded as unobjectionable are having serious, unforeseen impacts that require proper assessment. As noted by the National Academy of Sciences in its 2002 report, *The Environmental Effects of Transgenic Plants: Scope and Adequacy of Regulation*, the use of genetic engineering as the trigger for regulation does not conflict with a commitment to a case-by-case, risk-based approach to regulation of this technology.

## **2. Broadly interpret USDA's "noxious weed" authority under the PPA.**

APHIS should broadly interpret the PPA's noxious weed authority to fully mitigate or prevent all adverse effects of GE crops on agriculture, the environment, and public health, with specific focus on the economic harms from GE contamination, herbicide-resistant weeds, threats to public health, and the protection of biodiversity.

## **3. Implement a two-tiered permitting system.**

APHIS should clarify that it retains authority to monitor and regulate GE crops throughout the field-testing phase and after commercialization so that it can address adverse impacts and contamination issues as they emerge. APHIS should require permits both for field trials and commercial cultivation of GE crops. Both kinds of permits should be conditioned on the appropriate compensation of growers whose crops are contaminated through violation of permit requirements.

## **4. Not incorporate the Low Level Presence policy.**

APHIS' Low Level Presence (LLP) policy is unscientific and fatally flawed. It allows unlimited levels of experimental GE crop material contaminating commercial food, feed, or seed to be deemed "non-actionable," rendering the "low-level" appellation meaningless. The policy would also undermine prospects for co-existence by reducing the incentives of GE crop field-trial operators to prevent contamination in the first place. For coexistence to be feasible, the regulations must "establish scientifically valid and proven isolation and containment distances," as mandated in the 2008 Farm Bill (Sec. 10204(C)(1)(c)). The regulations must also clarify that it is the responsibility of the developer and the grower of GE crops to establish and maintain appropriate isolation distances and other gene containment measures to minimize the potential for contamination.

## **5. Prohibit the introduction of pharmaceutical and industrial GE crops.**

APHIS should use its noxious weed authority to prohibit the outdoor cultivation of plants engineered as biofactories for the production of drugs or industrial chemicals, and all cultivation of any pharmaceutical or industrial food crops. These crops produce compounds that may pose risks to human health and the environment, and in the event of inadvertent contamination can lead to huge costs throughout the supply chain.

## **6. Apply sound science to the regulation of GE crops.**

In the past, APHIS has relied too heavily on applicant-provided research and unreliable information from biotech industry sources. In some cases, APHIS has given such information greater credence than conflicting data and analyses from its own sister agencies, such as the National Agricultural Statistics Service, the Natural Resources Conservation Service, and the Agricultural Research Service. Sound scientific assessment of the use, risks, and impacts of genetically engineered crops is impossible without solid, unbiased data. APHIS should not cherry-pick science but instead employ sound scientific principles, as required under the Plant Protection Act and the Obama Administration's Memorandum on Scientific Integrity. The

Memorandum stipulates that “[s]cience and the scientific process must inform and guide decisions of my Administration,” with the “highest level of integrity in all aspects of the executive branch’s involvement with scientific and technological issues.”

We respectfully urge you to implement our recommendations as you move to promulgate final comprehensive rules implementing the PPA. This is a pivotal moment. Unless these new rules are strong and protective, the coming generation of genetically engineered crops will put at risk our health, our environment, and some of the most promising sectors of our agricultural economy.

Sincerely,

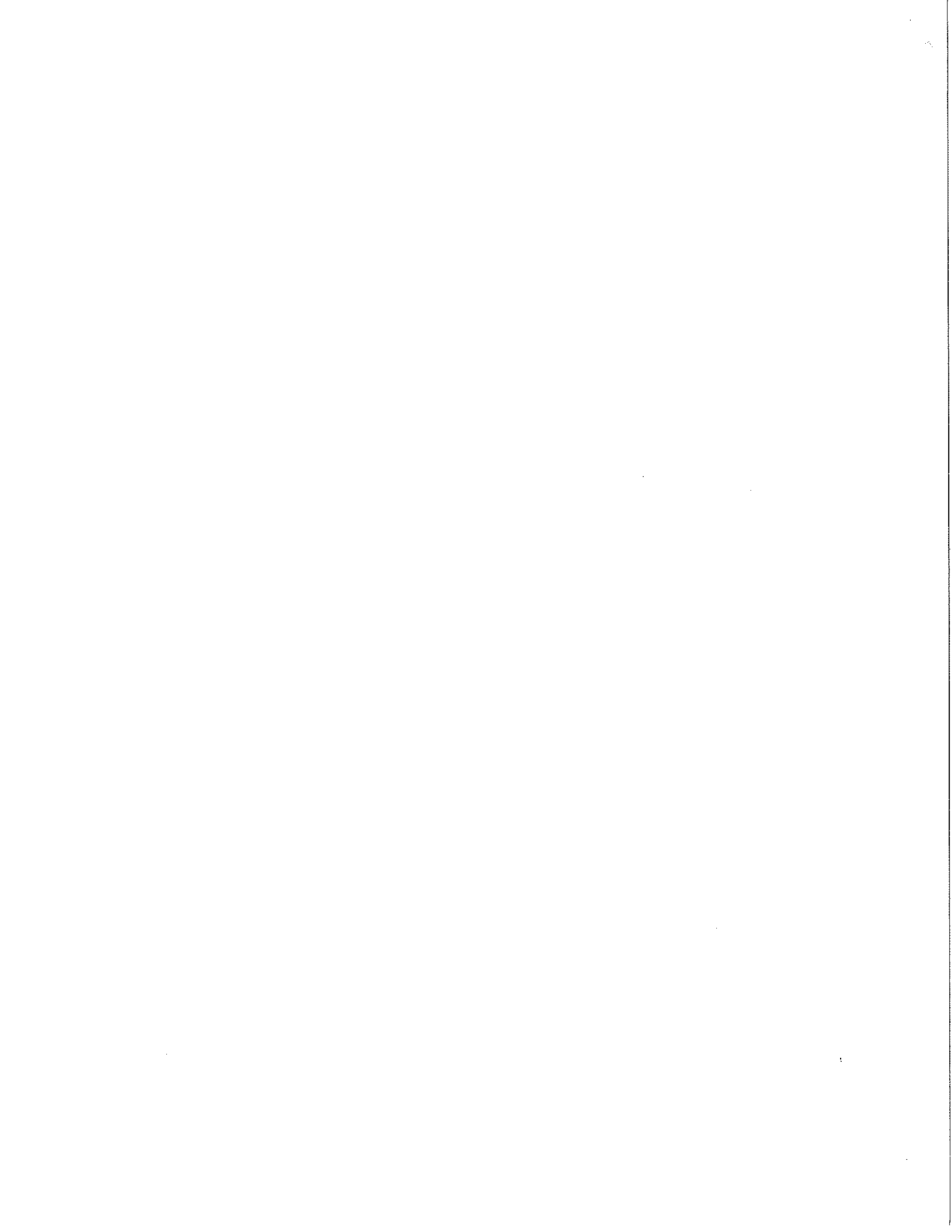
Center for Food Safety, *Andrew Kimbrell*  
Clif Bar & Company, *Gary Erickson and Kit Crawford*  
Clif Bar Family Foundation, *Thao Pham*  
CROPP Cooperative/Organic Valley, *George Siemon*  
National Organic Coalition, *Liana Hoodes*  
Organic Farming Research Foundation, *Ariane Lotti*  
Organic Trade Association, *Laura Batcha*  
Rural Advancement Foundation International – USA, *Michael Sligh*  
Seed Matters, *Matthew Dillon*  
Union of Concerned Scientists, *Doug Gurian-Sherman*

Abundance Cooperative Market, *Jim DeLuca*  
AggregateND.com, *Kirsten Moseng*  
Albert's Organics, *Melody Meyer*  
Alternative Energy Resources Organization (AERO), *Kevin Moore*  
Angelic Organics Learning Center, *Tom Spaulding*  
Ashland Food Co-op, *Annie Hoy*  
Bees' Needs, *Mary G. Woltz*  
Beyond Pesticides, *Jay Feldman*  
BriarPatch Co-op, *Chris Maher*  
Bundy Creek Farm LLC, *Cecelia Murray*  
California Farmers Union, *Lynne McBride*  
Californians for GE-Free Agriculture, *Renata Brillinger*  
Californians for Pesticide Reform, *Tracey Brieger*  
Carolina Farm Stewardship Association, *Roland McReynolds*  
CCOF, *Claudia Reid*  
Center for Environmental Health, *Charles Margulis*  
Central Co-op, *Capel Melton*  
Chico Natural Foods Cooperative, *Liz Tedesco*  
Church Women United of New York State, *Mary M. Smith*  
Comeback Farm, *Amy Hansen & Mark Canright*  
Consumers Union, *Michael Hansen, Phd.*  
Co-op Partners Warehouse, *Rick Christianson*  
Cornucopia Institute, *Mark A. Kastel*  
Cuatro Puertas, *Isaura Andaluz*  
Cumberland Countians for Peace & Justice and Network for Environmental & Economic Responsibility  
of United Church of Christ, *Donald B. Clark*  
Dr. Bronner's Magic Soaps, *David Bronner*



Dakota Resource Council, *Mark Trechock*  
 Demeter Association/Stellar Certification Services, *Jim Fullmer*  
 Devin Gardens LLC, *Christina A. Jacobs*  
 Durango Natural Foods Co-op, *Joshua Jackson*  
 Eden Foods, Inc., *Michael Potter*  
 Equal Exchange, *Keith Olcott*  
 Family Farm Defenders, *John Peck*  
 Family Farmers Seed Cooperative, *Don Tipping*  
 Farm to Table Food Services, *Jenny Huston*  
 Farm, Forest, and Fiddlehead Consulting, *Karl W. Hallen*  
 Flatbush Food Cooperative, *Barry Smith*  
 Florida Organic Growers - FOG, *Marty Mesh*  
 Food & Water Watch, *Patty Lovera*  
 Food Democracy Now!, *Dave Murphy*  
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 Grassroots International, *Nikhil Aziz*  
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STATEMENT DELIVERED  
AT LISTENING SESSION  
USDA NATIONAL ORGANIC PROGRAM  
WASHINGTON, D.C.  
SEPTEMBER 20, 2011

Good afternoon. My name is Richard D. Siegel. I am a lawyer in private practice in Washington, DC. Since 1998 I have focused my practice on the National Organic Program. I have advised and represented a wide variety of companies and associations that are subject to the NOP regulations.

I have come to this Listening Session to express my concern with the recent instruction issued by the NOP that sets a new policy for releasing information on enforcement actions being taken against certified operations. This Instruction, NOP 2607, "Disclosure of Information Concerning Certified Operations," states that all pending enforcement actions that the NOP and certifying agents take against certified operations, beginning with the first notice of noncompliance, will be freely disclosed to the public at any time.

While the intent of this policy is to make the NOP's enforcement activities wholly transparent, it is my opinion that this policy achieves this transparency at the expense of the fundamental due process rights of certified organic operations.

This policy introduces a new risk of business uncertainty for certified operations in the organic industry, and thus may impede the industry's continued growth. This policy puts sensitive information about enforcement actions into the public's hands long before the NOP's deliberate enforcement process is completed. Because of the keen interest in the organic community about NOP compliance and enforcement, it is likely that if a high-profile organic operation receives a noncompliance notice, this will be readily publicized and perhaps in an inflammatory fashion. To publicize the noncompliance action in this way would be highly misleading because that is only the first step in the long NOP enforcement process. Until now the NOP has treated all pending enforcement actions as confidential until they have been completed. As a result certified operations have not had to fear that they would be exposed to premature, damaging publicity in the marketplace. Now certified operations have every reason to expect that their organic status will publicly be called into question before all the facts are in.

Certified operations must meet the high standards of the NOP in order to become certified. They incur the time and financial cost to be certified initially and to keep their certification updated annually. They are subject to unannounced inspections and audits at any time. Therefore, whenever a certified operation receives a notice of noncompliance, the operation should naturally be afforded a reasonable opportunity to challenge it before its hard-earned certification is suspended or revoked. In fact, without this assurance of due process in NOP enforcement, a company would think twice about trying to get NOP organic certification in the first place.

The enforcement process must take time to ensure that the certified operation gets a full, deliberate hearing. Upon receiving a notice of noncompliance, the certified operation has the opportunity to correct the noncompliance or offer a rebuttal. If this

does not resolve the matter, the next step is a "proposed" notice of suspension or revocation, with 30 days for the certified operation to appeal to the AMS Administrator. Until the appeal is resolved, the certified operation continues to operate as before. Organic certification remains in effect until it is revoked, suspended or voluntarily surrendered.

The new policy short-circuits these enforcement rules by requiring public disclosure every time a certified operation has been cited for noncompliance. This undermines due process and could well discourage some companies from staying or becoming organic.

So in closing, I recommend that the NOP reexamine this new disclosure policy. The Freedom of Information Act (FOIA) does not necessarily compel the NOP to make these disclosures. First, under Exception 5 of the FOIA, the agency is to withhold "pre-decisional" documents generated inside an agency. The entire NOP enforcement process is designed as a "pre-decisional" and "deliberative" process within AMS, and should qualify for Exception 5. In addition, there is FOIA Exception 7, which calls for withholding sensitive documents naming parties in connection with law enforcement. NOP enforcement actions should qualify under this Exception as well.

Finally, because it is so important that the NOP continue to give certified operations due process when they are cited for noncompliance, I am opposed to the change in the appeal regulation that the NOP is proposing, which would provide that whenever the NOP itself has initiated an enforcement action against a certified operation, there would no appeal to the AMS

Administrator. I have a great deal of respect for the NOP staff members as knowledgeable and conscientious public servants, but they are human beings and are not infallible. Therefore, it is vital that after the NOP has issued an enforcement decision, a certified operation should continue to have the right to appeal that decision to the AMS Administrator before there are formal proceedings before an Administrative Law Judge.

Thank you for your attention, and I will be happy to answer any questions.



National Organic Standard Board

March 18, 2010

Dear Sir or Madam Board Member,

Today natural sodium nitrate is widely used throughout multiple regions of the US in organic fruit and vegetable production as well as pasture, row crops, and feed grain. In all these areas natural sodium nitrate is also a key ingredient for production of organic liquid and dry fertilizer blends.

A major challenge faced by organic farmers during cold soil conditions is the synchronization between crop nitrogen needs and soil nitrogen release. Natural sodium nitrate is a valuable tool organic growers can use to achieve this balance.

Alternative and mostly solubilized organic nitrogen fertilizers, including fish meal, blood and meat meal, corn steep liquor, feather meal, and guano, must undergo mineralization before becoming available for plant uptake. This process cannot be easily predicted or managed as it depends partially on certain factors that are beyond the control of the farmer (low temperatures, highly fluctuating temperatures, heavy rains, lack of rain).

Considering its natural origin and high efficiency, natural sodium nitrate should remain NOP allowed on a regulated basis to insure the needs of organic crops are properly satisfied, complementing the soil building practices of compost and manure applications as well as crop rotations including legumes. To deprive US organic farming from the use of natural sodium nitrate would only make this industry less efficient to supply organic products to its important local market compared to imports grown under more favorable climates.

We, the undersigned, are petitioning the National Organics Standard Board to maintain the current listing regarding the prohibition of Chilean Nitrate as an organic input for organic crop production unless its use is restricted to 20% of the crop's total Nitrogen requirement.

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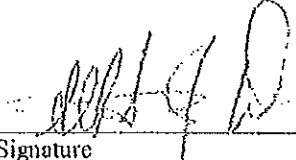
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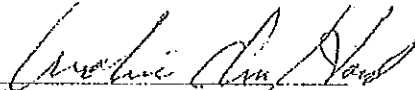
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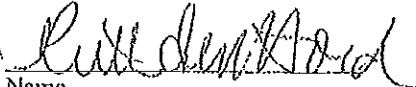
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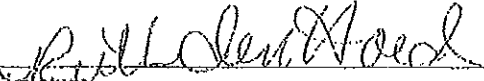
  
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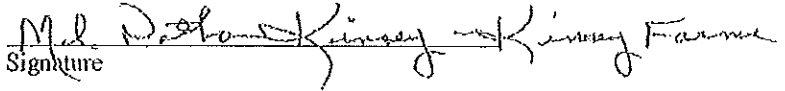
  
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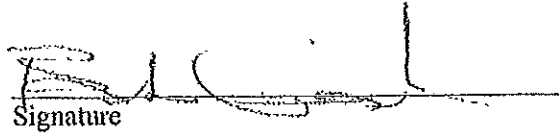
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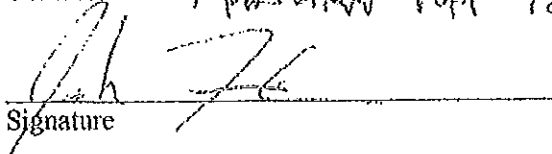
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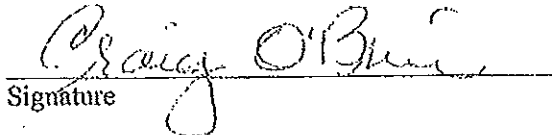
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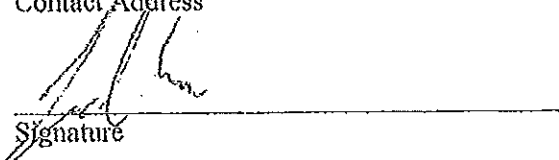
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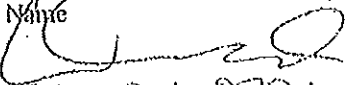
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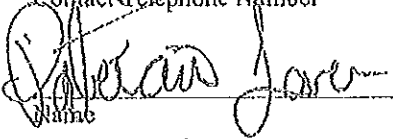
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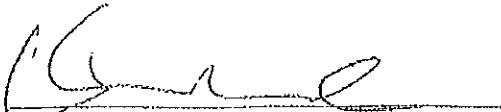
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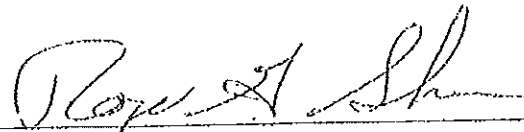
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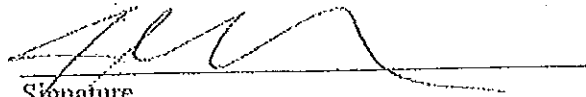
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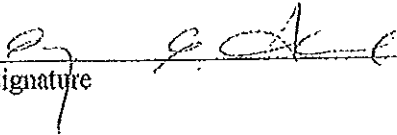
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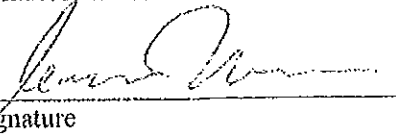
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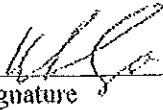
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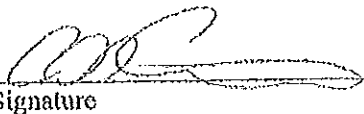
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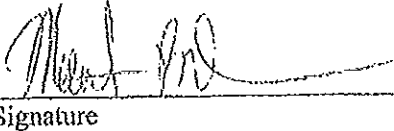
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Contact Address

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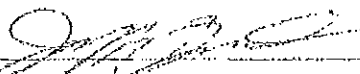
\_\_\_\_\_  
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Signature

Raymond Hunt  
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O'Neill, Thomas  
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Fay Benson  
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SA Ryle  
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Steve Ryle  
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Jewel Wood  
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Contact Telephone Number

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Contact Address

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Ginger Brown  
(Name Virginia)

Ginger Brown  
Signature  
(Virginia)

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Ashley Day  
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Ashley Day  
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Omar S. Cruz  
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Name

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Contact Address

Name

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AM  
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1821 Mill Jr Ave Bayley GA 31513  
Contact Address

Name

Shad Dasher

Signature

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1-888-526-5114

Contact Address

Name

Signature

Contact Telephone Number

Contact Address

Name

Signature

Contact Telephone Number

Contact Address

Michael D. W. Fall  
Name

Michael Budgett  
Signature

308-352-8280  
Contact Telephone Number

P.O. Box 264 Grant, NE 69140  
Contact Address

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Name

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Signature

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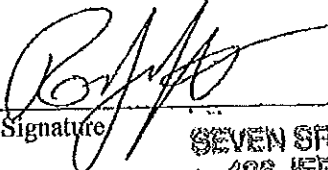
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RON JUSTER  
Name

540-651-3228  
Contact Telephone Number

  
Signature

SEVEN SPRINGS FARM  
426 JERRY LN. NE.  
CHECK, VA. 24072  
540-651-3228  
Contact Address

Name

Signature

Contact Telephone Number

Contact Address

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Contact Telephone Number

Contact Address

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Contact Address

STEVE CLARK  
Name

Steve Clark  
Signature

434-210-1122  
Contact Telephone Number

712 ARBOR LN, CLARKSVILLE, VA 23927  
Contact Address

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Name

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Contact Telephone Number

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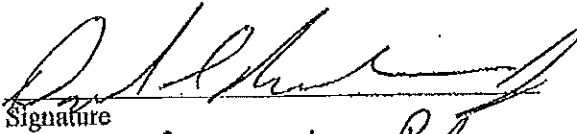
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Contact Telephone Number

Contact Address

David S Buchanan Jr  
Name

434-738-5180  
Contact Telephone Number

  
Signature

2592 Brankeley Rd  
Chase City Va 23924  
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Name

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Contact Telephone Number

M.L. McBride  
Signature

8682 SKIPWITH RD  
SKIPWITH VA 23968  
Contact Address

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Contact Address

James Barnard  
Name

James Barnard  
Signature

920-495-7434  
Contact Telephone Number

P.O. Box 858 Sturgeon Bay WI 54235  
Contact Address

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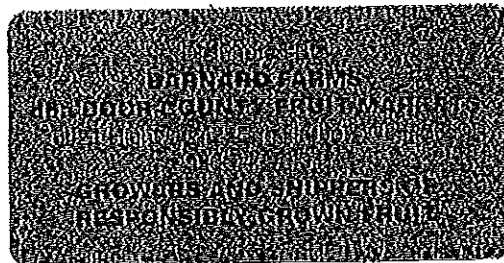
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DAN Kremer  
Name

419 336 5483  
Contact Telephone Number

Dan Kremer  
Signature

14360 Manger Road Yorkshire OH 45388  
Contact Address

\_\_\_\_\_  
Name

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Contact Address

Fred W Heitz Jr  
Name

Fred W Heitz Jr  
Signature

269-925-6987  
Contact Telephone Number

5109 River Rd Sodus, NY  
Contact Address 49126

\_\_\_\_\_  
Name

\_\_\_\_\_  
Signature

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Leonard J. Baulaha  
Name

715-669-7128  
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114369 Stealing Ave Wichita, Ki 67208  
Contact Address

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Name

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Signature

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Contact Telephone Number

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Contact Telephone Number

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Contact Address

David Dahner  
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920-650-2976  
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Name

\_\_\_\_\_  
Signature

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Contact Telephone Number

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Contact Telephone Number

\_\_\_\_\_  
Contact Address

Francis Shmoldas Blackmon  
Name

Francis Shmoldas Blackmon  
Signature

972-650-7237  
Contact Telephone Number  
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Cansel Keelmoa  
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Cansel Keelmoa  
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903 880 9939  
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1818 COMSTOCK  
Contact Address

MATT

Matt Munchrauth  
Name

Matt Munchrauth  
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Contact Address

Mich Munchrauth  
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Signature

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DANIELLE  
FONTEN  
OT

[Signature]  
Name

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Signature

409-774-1746  
Contact Telephone Number

1801 # Davis St  
Contact Address

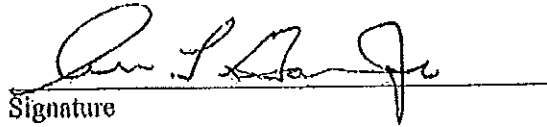
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214-783-9368  
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Contact Address Irving, TX 75062

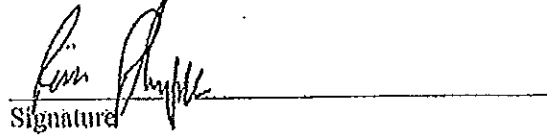
Allen Garner  
Name

  
Signature

972-252-5811  
Contact Telephone Number

3551 N. Baseline, Irving TX 75062  
Contact Address

Rick Phillips  
415-832-0132  
Name

  
Signature

415-832-0132  
Contact Telephone Number

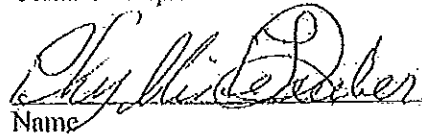
808 E. 5th Street Irving TX @ 75060  
Contact Address

Lonnie Redd  
Name

  
Signature

972-579-7042  
Contact Telephone Number

503 E. 2nd St. Irving, TX 75060  
Contact Address

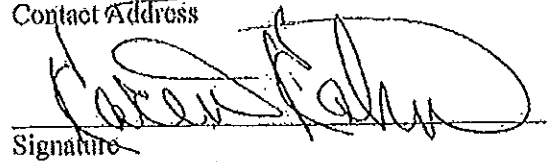
  
Name

  
Signature

972-514-4959  
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1310 Stone St  
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Signature

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Barbra Fitzgerald  
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RICHARD CLARK  
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Ann Hood  
Name

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Name

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Contact Telephone Number

\_\_\_\_\_  
Name

\_\_\_\_\_  
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John Carter  
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915 Jones Valley Park  
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Richard Clark  
Signature

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Contact Address  
FARMINGTONS

Phyllis Ann Hood  
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1507 Harvest Hill APO, TX 76014  
Contact Address

\_\_\_\_\_  
Signature

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Contact Address

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Signature

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Contact Address