

U.S. DEPARTMENT OF AGRICULTURE
TRANSPORTATION AND MARKETING PROGRAMS

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NATIONAL ORGANIC PROGRAM

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NATIONAL ORGANIC STANDARDS BOARD MEETING

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WEDNESDAY

MAY 21, 2008

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The Meeting of the National Organic

Standards Board convened in the Chesapeake Room,
Holiday Inn Inner Harbor, 301 W. Lombard St.,,
Baltimore, MD, pursuant to notice at 8:00 a.m.,
Rigoberto Delgado, Chairman, presiding.

BOARD MEMBERS PRESENT:

RIGOBERTO I. DELGADO, CHAIRMAN

JEFFREY W. MOYER, VICE-CHAIR

KATRINA HEINZE, SECRETARY

HUBERT J. KARREMAN

KEVIN ENGELBERT

JENNIFER M. HALL

JULIE S. WEISMAN

DANIEL G. GIACOMINI

GERALD A. DAVIS

KRISTINE ELLOR

TRACY MIEDEMA

JOSEPH SMILLIE

BARRY FLANN

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

2 8:02 a.m.

3 CHAIRMAN DELGADO: Please take your
4 places, we are about to start. Good morning to
5 all and we're starting with day 2 of our meeting.
6 And I am calling the meeting to order. Thank you,
7 Madam Secretary, make it official. Thank you for
8 that, as well, Julie. I hope you all had a
9 pleasant rest last night. We have a heavy
10 schedule today. We're going to start with a
11 presentation on materials and recommendations on
12 the part of all the committees, and then we'll
13 follow with another session of public comment.

14 In the first place, I would like to ask
15 the Chair of the Policy Committee, Dr. Barry
16 Flann, to give us his presentation on the
17 recommendations on both the changes to the policy
18 and procedure manual and also to the new member
19 guide. Barry.

20 MEMBER FLANN: I always need lots of
21 help. Thank you. Thank you, Mr. Chair. The
22 Policy Committee, everything we do is a real team

1 effort and the committee consists of Bea James, Hu
2 Karreman and our Chair Rigo Delgado. And today it
3 will be no different. I'll lead off with the
4 first of our recommendations and then Hu is going
5 to report on our other recommendations and then
6 followed finally with Valerie Francis who always
7 gives us tremendous help on every committee
8 meeting and Valerie will make the final report on
9 -- from the Policy Committee.

10 Our first recommendation is a change in
11 the Policy Development Manual, on Section 1 page
12 6 of the NOSB Mission Statement under carrying out
13 the mission, we propose adding the words, "or
14 deletion from". The statement would then read,
15 "Review petition materials for inclusion and/or
16 deletion from the national list of approved and
17 prohibited substances from the national list".
18 This is to conform with the language in the
19 regulations and yesterday there was a number of
20 comments on this very subject.

21 The second recommendation, Section 1
22 page 6 of the NOSB Mission Statement under

1 carrying out the mission, combine Items 4 and 6,
2 also add "timely" in the statement and "make full
3 use of communication channels". The statement
4 would then read, "Communicate with the organic
5 community, including conducting public meetings,
6 soliciting and taking public comments and provide
7 timely information and education on the NOP,
8 making full use of communication channels".

9 That's the recommended changes in the -
10 - the first recommended changes and Hu will carry
11 on from here.

12 MEMBER KARREMAN: Thank you, Barry.
13 The second change -- let's see, it's number 3,
14 right, Barry?

15 MEMBER FLANN: Number 3.

16 MEMBER KARREMAN: On Section 8 of the
17 National Organic Program material review process,
18 we want to add the paragraph describing how we
19 deal with petitions, their handling if they're
20 withdrawn by the petitioner and the proposed
21 paragraph would be placed immediately after Phase
22 6, page 35 and it would read regarding withdrawal

1 of petitions, "When a petition involving materials
2 are withdrawn by the petitioner, the Board shall
3 suspend its review and recommendation procedure.
4 In the case of a petition not involving a
5 material, board members have the option of
6 completing its review and providing a
7 recommendation or guidance. In the case of a
8 petition previously withdrawn is then resubmitted,
9 the Board should review it in the order that it is
10 received. That means that a withdrawn petition
11 should be considered a completely new request and
12 then falls to the end of the queue of materials
13 pending review. And of course, the petitioner can
14 withdraw a petition at any moment during the
15 process of review by the Board during public
16 comment or prior to the Board's voting on the
17 petition. So petitioner should have the
18 opportunity to withdraw a petition with the intent
19 of improving it, getting new information, new
20 data, research and only that. It is the hope of
21 the Board that petitioners will not abuse this
22 privilege with the intent of finding agreeable

1 members in subsequent submissions as our Board
2 changes over." So you can withdraw a petition to
3 add research data, resubmit it, but it will go to
4 the end of the line and you can do that at any
5 time. Okay?

6 The other update we want to do to the
7 New Member Guide is that we want some of the NOSB
8 members suggested the addition of two sections to
9 the New Member Guide which include adding
10 hyperlinks to past Board recommendations and also
11 a list of common technical sources that we can use
12 as Board members and that should improve the
13 process of conducting our business and training of
14 incoming members to get them up to speed as
15 needed.

16 So the recommendation would be --
17 recommends two updates to the New Member Guide
18 document, addition to Chapter 5, Section B,
19 suggested best practices, making the most of your
20 conference calls and meetings, of a descriptive
21 paragraph and a link to the final NOSB
22 recommendation table and also addition to Chapter

1 5 suggested best practices of a new section called
2 F, list of common technical sources used by NOSB
3 members. So that's the two recommendations. I
4 can go in a little more detail for Recommendation
5 1.

6 CHAIRMAN DELGADO: I think that will be
7 enough.

8 MEMBER KARREMAN: Is that enough?

9 CHAIRMAN DELGADO: Anything else you
10 want to add, Barry, to that?

11 MEMBER FLANN: No, not to that.

12 MEMBER KARREMAN: Yes, as Valerie is
13 scrolling through there, there's a whole long list
14 of hyper-links to various government agencies and
15 NGOs and other professional societies that would
16 be added into the New Member Guide which should be
17 pretty helpful. And we should be open to adding
18 to that kind of as needed. I don't know if that
19 might have to be in the recommendation that it's
20 open for updating.

21 CHAIRMAN DELGADO: It doesn't have to
22 be in the recommendation and I think it is well-

1 understood that it will be a living document and
2 updated as needed. Are there any questions for
3 the members of the Policy Committee. Yes.

4 MEMBER FLANN: There's still one, we'll
5 let Valerie make her report and --

6 CHAIRMAN DELGADO: I apologize for
7 that.

8 MEMBER FLANN: -- and then we'll take
9 questions.

10 CHAIRMAN DELGADO: Please, Mr.
11 Chairman, continue. Before that, let me allow Mr.
12 Richards to provide us some comment. I believe
13 this might be relevant. Yes, sir.

14 MR. MATTHEWS: I just have one question
15 with regard to the timing of the withdrawal.

16 CHAIRMAN DELGADO: Mr. Richards, can
17 you hold on, on that, please? Matthews, I'm
18 sorry. It's quite early. I apologize. Let's
19 listen to the last item presented by the Policy
20 Committee and then we'll come back and answer
21 specific questions. Valerie, please.

22 MS. FRANCIS: One thing that's been

1 requested a lot is having a list of all historical
2 recommendations by the NOSB and sort of their
3 status. And some go back, way back, 1993, '94,
4 '95. And as people ask questions, too, about
5 recommendations that are sort of lost in the
6 institutional memory, I've been collecting those
7 questions and indicating where they are, in what
8 meeting of what page, of what transcript, little
9 by little and I've amassed quite a document.

10 They recently -- they've been going
11 through a process of migrating the entire website,
12 so now I'm going to have to go back and update all
13 those links. And so just communicating the status
14 of we're working towards it. It's one of those
15 projects that you tuck in and you do as you go and
16 it's -- I'm hoping it will be a useful thing. I'm
17 not quite sure how it will all fit in on the new
18 website but my webmaster will work with me on that
19 as we get closer to bringing that forward. So,
20 just to let you know, I'm working on it.

21 CHAIRMAN DELGADO: Okay, now, we're
22 open to questions. Mr. Matthews.

1 MR. MATTHEWS: I just need a little
2 clarification on the withdrawal and then
3 resubmission. Clearly a petitioner can withdraw
4 their petition at any time. But is it my
5 understanding or is my understanding correct that
6 once the Department has spent thousands of dollars
7 reviewing the material, and the report comes out,
8 that the person would be allowed to resubmit so
9 the Department would spend thousands of dollars a
10 second time?

11 MEMBER KARREMAN: I would -- can I try
12 to answer that?

13 CHAIRMAN DELGADO: Please, yes.

14 MEMBER KARREMAN: I would think that
15 with the resubmission process that it's limited to
16 just new data that you would only need to take
17 that into account on top of what was already
18 accomplished. That would be my understanding, but
19 -- or my thinking.

20 CHAIRMAN DELGADO: That seems to be the
21 spirit of the proposal, is that correct, Mr.
22 Chairman?

1 MEMBER FLANN: Yes.

2 CHAIRMAN DELGADO: Are you satisfied
3 with that response?

4 MR. MATTHEWS: Yes, I'll want to think
5 about it more, though. I mean, I just have a
6 problem with, you know, spending thousands of
7 taxpayer dollars to rereview something, so we'd
8 have to work with the contractor to make sure that
9 we weren't repaying for everything. It's still
10 going to be expensive to re-analyze the material
11 with the new data. So I mean, I will still cost
12 us a lot of money.

13 CHAIRMAN DELGADO: But just to clarify,
14 you're saying that you will not have to start from
15 zero; is that correct?

16 MR. MATTHEWS: Oh, I would think we
17 would not have to start from zero but I'm not
18 saying that it wouldn't be of substantial cost to
19 do it a second time.

20 CHAIRMAN DELGADO: We have Jennifer,
21 correct, followed by Dan -- well, Dan, followed by
22 Tina. Dan.

1 MEMBER GIACOMINI: Mr. Matthews, I
2 believe the -- and maybe it would need some
3 clarification. I believe the intention of the
4 recommendation is regarding the NOSB. It's not a
5 directive to the NOP that if it's a completed
6 petition and it's been fully reviewed, the we're
7 requesting that you re-review it. It's just a
8 matter of us trying to prioritize the materials
9 and the volume of materials that come to us that
10 we try and deal -- get the older materials that
11 have been sitting on our desk for a long period of
12 time, we try and get those taken care of.

13 The intent, I believe in this, is
14 simply saying that the date that we're going to
15 look at is when we receive this document, when we
16 receive the petition is not three years ago and
17 now that the petitioner has said, "Reactivate that
18 petition", we are faced with looking at something,
19 "Well, that's -- we've had this for three years".
20 It's to say that we've had this as of today and
21 the one we got last month, we received from the
22 program last month, has time-wise a higher

1 priority than this one which received today even
2 if this one has been in existence for three years.

3 I think it's an NOSB directive, not an
4 NOP at all.

5 MR. MATTHEWS: Okay, so then I would
6 understand that what you're saying is that they
7 would withdraw the petition long enough to submit
8 additional information to the Board and the Board
9 would be acting on that without going back to the
10 contractor for additional work.

11 MEMBER GIACOMINI: That would be your
12 decision but it wouldn't be impacted by this
13 recommendation. That would be just, you know,
14 Bob's normal evaluation of petitions as they come
15 through and new material, new information comes
16 through.

17 MR. MATTHEWS: Okay.

18 MEMBER GIACOMINI: But we've had some
19 petitions in the recent past that have been
20 withdrawn and the petitioners just like come back
21 and say, "Okay, we want you to look at it again
22 now". I'm not even aware that they submitted any

1 new information.

2 MR. MATTHEWS: Okay.

3 CHAIRMAN DELGADO: Tina.

4 MEMBER ELLOR: Can I ask what happens
5 now to petitions that are withdrawn officially?
6 I guess that would be a question for Richard.

7 MR. MATTHEWS: That's going to depend
8 on what had already taken place previously. I
9 mean, if the petition came in and it was withdrawn
10 before we did a TAP, well, then obviously, it
11 would go to the Board and then they would create
12 whatever questions they have for the reviewers,
13 and then it would go out for the TAP review.

14 MEMBER ELLOR: If it was reinstated or
15 withdrawn? So, yes, I think the issue is here,
16 petitions that have gone through the process, it
17 looked like it wasn't going to go the way the
18 petitioner wanted, so they were withdrawn. What
19 happens with those now?

20 MR. MATTHEWS: Bob? Normally, when
21 they're withdrawn there's nothing that happens
22 with them. They're done.

1 CHAIRMAN DELGADO: But I think the
2 concern is, do you destroy those documents or the
3 record has disappeared or what's happened? Is
4 that your question?

5 MEMBER ELLOR: Right, yes, they're
6 still on the -- you know, the spreadsheet with a -
7 - sort of an open -- go ahead.

8 MR. POOLER: This is Bob Pooler, NOP.
9 If the petition is withdrawn, then that is the end
10 of that petition. Then a new petition -- if the
11 substance were to be brought up again, a new
12 petition would have to be submitted. If the
13 petition is going to be considered at a later
14 time, then the petition is deferred until such
15 time as the supplemental information is provided
16 and taken up and put back on the work plan of the
17 respective committee.

18 MEMBER ELLOR: Okay, and deferred is a
19 decision we make and withdrawal is a decision the
20 petitioner makes.

21 MR. POOLER: Well, yes, essentially,
22 yes.

1 CHAIRMAN DELGADO: Any other questions?
2 Kevin?

3 MEMBER ENGELBERT: Did the committee
4 give any thought to -- with your concern that the
5 petitioners will not abuse the privilege of being
6 able to withdraw a petition until more favorable
7 or agreeable members in subsequent meetings? Did
8 you give any thought to not accepting a
9 resubmission unless there was new material
10 presented with the petition so that it couldn't
11 simply be held?

12 MEMBER KARREMAN: I think he means,
13 basically that if they resubmit it, there has to
14 be new data. We need to require that instead of
15 pulling it and sending it back in three years
16 later when there's different board members. Is
17 that what you're saying, Kevin, just to make sure
18 there's new data, you know, as we're asking for
19 specify that. Okay?

20 CHAIRMAN DELGADO: Okay, that is a
21 proposal presented by one of the members, good.
22 Well-articulated. Mr. Chairman, would you like to

1 add something to that?

2 MEMBER FLANN: Well, I think that was
3 discussed and I believe we felt that we could not
4 limit somebody submitting a petition. I mean,
5 essentially, we're treating it like it's a new
6 petition and they could submit anything they
7 wanted to, so we really couldn't control it. But
8 we did discuss that several times. So maybe
9 that's either a legal point or a procedural point
10 that could be cleared up, whether we could require
11 that. I think I'm right, Rigo, that we thought in
12 final that we could not limit what somebody
13 submitted. It was up to them and not up to us to
14 determine that. Am I correct?

15 CHAIRMAN DELGADO: That is correct and
16 there is also a good proposal. My recommendation
17 would be for the committee to get together and
18 discuss that specific item and see if you need to
19 make any additions to your current recommendation.
20 Okay?

21 MEMBER FLANN: And I think we probably
22 would need some guidance on that point.

1 CHAIRMAN DELGADO: Will do. So it's up
2 to the committee and we'll be able to discuss
3 that. Any other question for policy? Jennifer,
4 followed by Dan.

5 MEMBER HALL: My comments have to do
6 with the resource list and I think it will be
7 quite helpful to new members, and I would just
8 like to encourage and solicit the aquaculture
9 working group to compose a list of links that we
10 could add to this, that would be pertinent to
11 those topics.

12 CHAIRMAN DELGADO: Thank you. Dan.

13 MEMBER GIACOMINI: I'm concerned with
14 in recommendation number 2, on the Policy and
15 Procedure Manual, the expectation that you're
16 potentially placing on Board members with the
17 statement "making full use of communication
18 channels". We're all volunteer Board members. We
19 have certain things that we can get to and certain
20 things that we can't. I can kind of see this as
21 becoming an expectation that we're going to be
22 expected to be on all the 0 sites.

1 If someone calls and says, "I've got a
2 meeting 500 miles away, come and tell us what's
3 going on at the NOSB", it just seems like there's
4 a potential expectation/burden that is -- could be
5 placed on from this wording that I'm a little
6 concerned with. We're volunteers and we're
7 putting in all the time, sometimes more time than
8 we can afford now.

9 CHAIRMAN DELGADO: Response.

10 MEMBER KARREMAN: I think I can answer
11 that, Dan. The intent of that was not that. The
12 intent is that to make full use of the internet,
13 snail mail, all kinds of communication that way
14 such that farmers that are not on the internet
15 will be apprised of information. Wasn't that what
16 we were talking about?

17 CHAIRMAN DELGADO: I believe that was
18 the intent. Correct me if I'm wrong, Mr.
19 Chairman.

20 MEMBER FLANN: No, that is correct. We
21 wanted to make sure that as we go more and more in
22 the internet communication, that we did not forget

1 about people that were not so connected, that we
2 provide information to them also and it was felt
3 that we -- I guess we never thought about it the
4 way you're describing as putting a burden on it.
5 We just wanted to make sure we had a policy of
6 getting information out to all the stakeholders
7 and all the publics we deal with and they receive
8 this information in a timely manner, that it's
9 meaningful and what they were doing. And it's --
10 and I think we feel that that is a role, an
11 important role of the Board is the communication
12 with the public. And we just -- we're trying to
13 strengthen that a little bit in the manual.

14 CHAIRMAN DELGADO: Any clarifications
15 that you would like to submit then? Was that a
16 clear explanation?

17 MEMBER GIACOMINI: It's a clear
18 explanation of your intent. I just -- I'm not
19 sure that that's -- you know, a year down the road
20 when someone is reading that, I'm not sure that
21 that's going to be the same as what their
22 expectation is going to be from reading that

1 statement.

2 CHAIRMAN DELGADO: Okay, thank you.

3 Jeff.

4 VICE-CHAIR MOYER: Thank you, Mr.

5 Chairman. Hu, I've got a question for you

6 regarding that same topic because you do tend to

7 work with a lot of non-internet connected folks in

8 your practice. Are they made aware of these

9 meetings? Do they know they exist? Do they know

10 they can make public comment? Do they choose not

11 to? I know we did see one letter that was scanned

12 into the system but is that something that they

13 know they can do currently, since everything is

14 posted on regulations.gov, which is not within

15 their purview?

16 MEMBER KARREMAN: Since you asked about

17 my farmers, let's say, my clients that I work

18 with, I would say that in my personal

19 communication with them out in the barns, they

20 know a meeting is about to happen or has happened.

21 They want to know what's going on. I would say

22 you know, we had our meeting in State College,

1 which is about as close to Lancaster County where
2 I'm from, as it will ever be. Well, Baltimore is
3 pretty close, too, and they weren't really there.
4 So I think that's not because there's not
5 communication of meetings coming up. I'm not so
6 sure that they have time to get away or they have
7 the absolute interest that others may. But I
8 think they should not be neglected as far as
9 communication channels. Does that help?

10 I mean, that was the intent basically.

11 VICE-CHAIR MOYER: Well, just I'm a
12 little concerned, you know, with Dan's comment and
13 thinking about like what Valerie might have to do.
14 You're going to have to put a notice in the mail
15 of all these things? I mean, how are you going to
16 -- we don't have their addresses.

17 MEMBER KARREMAN: Well, I think what we
18 were -- the discussion, if I remember right, was
19 mainly talking about the internet and the
20 hyperlinks and it was kind of -- and I said,
21 "Whoa, whoa, whoa, hold on, you know, my farmers
22 don't use that", and that's why we came up with a

1 more inclusive statement rather than just kind of
2 quick internet, you know, expression of the news
3 or hyperlinks.

4 CHAIRMAN DELGADO: Is that clear?
5 Kevin.

6 MEMBER ENGELBERT: Yes, if I understand
7 this recommendation properly, the only changes
8 that are made are the underlying words "timely",
9 and "making full use of communication channels".
10 The italicized that aren't underlined were already
11 part of the recommendation. So there's no real
12 huge change as far as what's required. It's just
13 the emphasis on using all means to communicate.

14 VICE-CHAIR MOYER: That was the intent.

15 CHAIRMAN DELGADO: Good clarification.
16 Any other comments, questions? Very well. Well,
17 thank you very much. That was a clear
18 presentation, lively discussion. Appreciate that
19 and we can move onto the next topic which involved
20 the Materials Committee and I will yield to my
21 colleague, Mr. Dan Giacomini.

22 MEMBER GIACOMINI: Thank you, Mr.

1 Chairman. The presentation from the Materials
2 Committee, we do not have a voting action item
3 under discussion today for this meeting but this
4 portion of the meeting will be a tag-team between
5 myself and some members of -- the co-chairs of the
6 Materials Working Group and so within our time
7 frame, we're trying to devote as much time toward
8 the discussion of that document as possible.

9 As a result, I'm going to give a short
10 presentation, hopefully short presentation on the
11 materials, an update on the material status of
12 things, but it's not as complete as I've given in
13 the past and I will -- I could possibly go over
14 some things fairly quickly that are even on the
15 slides purely as an essence of time, not a matter
16 of trying to get around any information.

17 But we've gotten back in the habit of
18 doing this on a regular basis at meetings and you
19 can go back to prior meetings and look at those
20 presentation documents for a more full explanation
21 of things.

22 So to move onto that, we'll have a

1 brief discussion of the National List of Allowed
2 and Proved Substances Petitioned and Sunset Review
3 Items, the material view process, national list
4 criteria, sunset review criteria and some final
5 notes. Next slide.

6 The National List of Allowed and Proved
7 Substances is broken down into crops, livestock
8 and handling, Section 601, synthetic -- for crops
9 it's synthetic allowed, 602 is non-synthetics
10 prohibited. For livestock, Section 603 is
11 synthetics allowed, 604 non-synthetics prohibited.
12 For handling Section 605 is non-agricultural, non-
13 organic substances allowed. Section A is non-
14 synthetics and Section B is synthetic materials.
15 So all non-agricultural, non-organic in processing
16 as opposed to livestock and crops must be on the
17 National List.

18 606 for handling non-organically
19 produced agricultural products allowed as
20 ingredients in or on processed products labeled
21 inorganic. The petitioned items and sunset review
22 items for this meeting, status at the time of this

1 meeting, we have recommendations for 601 with
2 three items as listed. 603 has two items as
3 listed, one of those having two separate
4 recommendations. We have no 605 item
5 recommendations being considered at this meeting.

6 Section 606, we have, I believe it is
7 20 items being considered at this meeting. Sunset
8 items at this meeting, we have tartaric acid being
9 reviewed for sunset, for its listing both on 605A
10 and 605B and we will be reaffirming -- voting to
11 reaffirm or not the sunset recommendations from
12 the fall 2000 meeting, so that we are following
13 the proper governmental guidelines that we give --
14 in case there was any consideration,
15 reconsideration due to additional public comment
16 that was allowed in the timing from the posting of
17 the Federal Register Notice on sunset.

18 At the time of this meeting, in the
19 NOSB pipeline, that's our pipeline not the NOP's
20 pipeline, we have the substances listed by the
21 sections shown. And you'll see underneath 606 is
22 asterisk next to yeast, that is a petition to

1 consider the transferring of yeast from 605 to
2 606.

3 And the material review process, it is
4 a minimum time frame for the National Review
5 Materials' review of 145 days being an absolutely
6 minimum. That's not necessarily what happens, but
7 that is the minimum. Under the material review
8 process a minimum of 14 working days for the
9 petition to be received by the NOP and reviewed
10 for completeness and upon determination of
11 completeness by the NOP, the petition is forwarded
12 to the NOSB materials chair. That is the optimal
13 situation if the petition is perfect at its
14 original submission. This could take much longer
15 as communication goes back and forth between the
16 program and the petitioner. Once the material is
17 passed on, the petition is passed onto the NOSB
18 and the materials chair, the materials chair
19 forwards the petition to chairman of the
20 designated NOSB committee, crops, livestock or
21 handling that would be handling and evaluating
22 that petition substance. The petition is re-

1 evaluated for completeness, determination of
2 requesting a TAP and that information is passed
3 back to the program.

4 So that is the time frame at the
5 beginning of the process. At the end of the
6 process, 60 days prior to the NOSB meeting, the
7 TAPs have been received by the program and sent
8 back to the -- they're sent onto the NOSB. The
9 TAP is reviewed. It's posted on the NOP website
10 for review and public comment. Committee
11 recommendations are posted and within 45 days
12 prior to the meeting, public comment is accepted
13 by the NOP and posted on the website. So we have
14 a beginning time line and an end time line. Do
15 not assume that those two time lines that we're
16 talking about are necessarily touching. There
17 could be -- there's constant work on the
18 petitions, but it does take time and that's why
19 we're talking a minimum of 145 days.

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

1 comments are taken into consideration, and action
2 is taken by the full Board regarding the committee
3 recommendation. During the entire process, we
4 need to remind everyone that all communication
5 between petitioners and the NOSB should go through
6 the National Organic Program.

7 CHAIRMAN DELGADO: Okay, just a
8 reminder, and excuse me. Let's make sure we have
9 our phones off and we do have someone paying for
10 drinks tonight. We'll take care of recording the
11 name later. Please continue.

12 MEMBER GIACOMINI: National List
13 criteria, and for all general substances, petition
14 -- the potential of such substance for detrimental
15 chemical interactions with other materials using
16 organic farming, the toxicity and mode of action
17 of the substance and of its breakdown products.
18 Number 3, probability of environmental
19 contamination from use or misuse and the effect of
20 the substance on human health, and number 5, the
21 effect of the substance on biological and chemical
22 interactions in the agro-eco system.

1 Number 6, alternatives used to using
2 the substance and the compatibility with a system
3 of sustainable agriculture. The one section that
4 I did cut severely from previous documents is
5 discussed in the processing age and age events,
6 since we had none of those being discussed on the
7 National List at this meeting, for the matter of
8 time, I deleted that section and please refer to
9 the Fall 2007 Meeting Materials Presentation for
10 reference.

11 For 606 which is agriculture and
12 potential commercial unavailability or potential
13 fragility of supply, NOSB will consider why the
14 substance should be permitted in the production or
15 handling of organic product. Current industry
16 information regarding availability and history of
17 unavailability of the organic form and the
18 appropriate form quality or quantity of the
19 substance. The industry information includes but
20 is not limited to region of production and the
21 number of suppliers and amount produced.

22 Current and historical supplies related

1 to weather is also considered. Trade related
2 issues and any other issues that may be present --
3 that may present a challenge to consistent supply.
4 The sunset review criteria taken from OFPA, no
5 exemption or prohibition contained in the National
6 List shall be valid unless the National Organics
7 Standards Board has reviewed such exemption or
8 prohibition as provided in this section within
9 five years of such exemption or prohibition being
10 adopted or reviewed by the Secretary has renewed -
11 - and the Secretary has renewed each exemption or
12 prohibition. So everything needs to be reviewed
13 by five years, reasserted by the program, by the
14 Board in order for relisting.

15 The sunset process is not used to
16 petition a new item or substance of the National
17 List and it is not used to change an existing
18 annotation. Now, the sunset review criteria, the
19 NOSB must solicit information and comments to re-
20 evaluate substances against the same criteria used
21 for National List posting. New evidence must be
22 presented to overturn a prior Board's decision and

1 remove an item from the National List. Exemptions
2 were accepted because the evidence allowed showed
3 substances were found to be not harmful to human
4 health or the environment. The substances were
5 necessary because of the unavailability of
6 synthetic alternatives and/or the substances were
7 consistent and compatible with organic practices.

8 Final note, all public comments are
9 currently handled through regulations.gov website,
10 handled according to the appropriate Federal
11 Register docket and governmental agency. The new
12 process sets deadlines for having public comment
13 posted prior to the meeting and all public comment
14 received by the NOP will be made available and is
15 made available to the NOSB members for review in
16 advance of the respective vote whenever possible.

17 And finally, a listing of relevant
18 websites for the National Organic Program,
19 National Organic Standards Board and
20 regulations.gov. Thank you, Mr. Chairman.

21 CHAIRMAN DELGADO: You're welcome. Any
22 questions? Julie?

1 MEMBER WEISMAN: Hello?

2 CHAIRMAN DELGADO: It is working.

3 MEMBER WEISMAN: Okay. I just -- I am
4 very reluctant to take any time away from the
5 second part of the materials presentation this
6 morning. However, in terms of 606 and in light of
7 some issues that have been raised during the
8 written public comment period and the spoken
9 public comment period yesterday, I wanted to
10 acknowledge two situations.

11 One, the slide that was up there had a
12 little note at the bottom that no TAP reviews for
13 606 items. And while that is the case currently,
14 there was public -- there -- it has come to light
15 through very thoughtful public comment in the last
16 few months that some of the items on -- that
17 notation assumed that single agricultural
18 products, raw or processed, were what were being
19 petitioned and that was a common sense notation,
20 that those should not be TAP reviews. It has been
21 pointed out that a number of the color materials
22 that were petitioned at the last meeting are

1 formulated products and do need to be looked at
2 further. So I just want to say that I think that,
3 that -- not that there will be whole TAP reviews
4 but it is understood that those materials need to
5 be looked at more carefully, not just assumed that
6 it's all agricultural product in there.

7 CHAIRMAN DELGADO: Just as a
8 clarification, so you'll be treating each case on
9 a case-by-case basis?

10 MEMBER WEISMAN: Well, I don't even --
11 you know, I think that we haven't even really --
12 we haven't had a full and depth of discussion as
13 a committee even, the Handling Committee or enough
14 discussion with the program yet about how to
15 respond, but I did want to acknowledge these very
16 well thought out comments were made and that was
17 not ignorant of them.

18 The second thing that has come up
19 during comment is that you read a list of the
20 evaluation criteria for 606 items, and I also
21 wanted to point out that more than one comment has
22 been made in recent weeks about which of -- we put

1 a lot of work recently into the evaluation
2 criteria that are specific to 606 in terms of
3 evaluating the supply and the fragility of the
4 supply. But there are other criteria, evaluation
5 criteria, that do apply to 606 items just like 605
6 A and B items not the same ones, and many of them
7 are not applicable and it may -- we will also need
8 to look and make that more consistent and have it
9 be very clear which ones are -- very clear, you
10 know, like question by question by question and
11 that that is also something that we are not --
12 we're not ignoring.

13 CHAIRMAN DELGADO: Dan.

14 MEMBER GIACOMINI: The development of
15 the TAP process has evolved a bit. It's a fairly
16 new development that I don't have a full grasp of
17 but there was discussion at the program level with
18 other branches of the government or other offices,
19 I guess is the more proper term, regarding the TAP
20 status of the 606 items that we did pass.

21 The absolute -- as I understand -- do
22 you want me to deal with this, Barbara, or do you

1 want to try and attack this?

2 CHAIRMAN DELGADO: Barbara, can you
3 clarify it, please?

4 MS. ROBINSON: The Board is the -- you
5 are a technical advisory panel. You can do that
6 TAPs on 606.

7 CHAIRMAN DELGADO: Dan, do you have -
8 - was that clear enough? Do you want to comment
9 some more?

10 MEMBER GIACOMINI: No, I mean, that's
11 the status from the program and you know, there -
12 - I think it's going to be an evolving situation.
13 We'll just see how it goes, what does need to be
14 further outside review.

15 CHAIRMAN DELGADO: And why way of
16 clarification, we've discussed this at the
17 Executive Committee level and we are in the
18 process of redefining when to deal with the
19 specific TAP, whether we need to farm it out to
20 third parties or use our own resources within the
21 program, because as pointed out, we have our in-
22 house expertise and we can always tap into that.

1 Yes, Julie.

2 MEMBER WEISMAN: Well, also I wanted to
3 introduce the language that -- of a technical
4 review is a word that we've been using which is a
5 bigger concept than just a TAP which is a very
6 specific thing that we normally and historically
7 have associated with outside contractors. Is that
8 a fair distinction?

9 MS. ROBINSON: What's your question,
10 Julie?

11 MEMBER WEISMAN: The technical review,
12 as we have been discussing it lately as distinct
13 from what we have historically farmed out to
14 subcontractors which were always called TAPs.

15 MS. ROBINSON: Correct.

16 MEMBER WEISMAN: Okay.

17 CHAIRMAN DELGADO: And also the Policy
18 Committee has part of their work plan to help out
19 and develop the procedures as to -- to identify
20 when to use those different resources, outside or
21 inside resources. Any other questions? First of
22 all, have you concluded? Okay, do you wish to

1 proceed with some other item?

2 MEMBER GIACOMINI: Yes. The next item
3 under the material section for this morning is a
4 presentation from the Materials Working Group. I
5 believe Kim and Gwendolyn are going to offer up
6 that presentation, if they would come up, please.

7 MS. DIETZ: Good morning. We practiced
8 but we didn't figure out who was going to stand or
9 sit. We're going to dance, too. Okay, good
10 morning. My name is Kim Dietz and most of you
11 know me but for the new member, I'm a past NOSB
12 member, five years. I chaired the Materials
13 Handling Group and was a Handler Representative.
14 So at the last meeting, I kindly volunteered to
15 handle something called -- or to form something
16 called the Materials Working Group. And Gwendolyn
17 and I co-chair that group.

18 I just want to read to you the summary.
19 And you've all received a copy of our paper. On
20 the last page, "The members of the Materials
21 Working Group represent a broad spectrum of
22 backgrounds and segments of the industry. All of

1 us have strong opinions about the subject with
2 extensive implications for the meaning of an
3 organic label and its potential for application to
4 all aspects of food and agriculture, including a
5 host of other consumer goods that were not
6 considered with OFPA was drafted.

7 We recognize that it would not be easy
8 to resolve many issues surrounding the definition
9 of non-agricultural substances and its impacts on
10 what products may or may not eventually be able to
11 be organically produced." There's 22 individuals
12 on this working group. Most of us have been in
13 the industry for a very long time and to say the
14 least, our conversations were heated many times,
15 but I think we're working very good and
16 functioning very well together.

17 I'd just like to take a moment to tell
18 you that the group is independent. We're not an
19 affiliation of a task force of the NOSB. We're
20 not an organic trade association working group.
21 We are individuals and the purpose of that was so
22 that everybody could be welcome and we encourage

1 everybody to participate. So anybody out there
2 who wants to join our group, please come see
3 Gwendolyn and I at some point.

4 The other thing, I'd like to thank OTA
5 because they did offer us to use their conference
6 line weekly. Twenty-two people on a weekly basis
7 was very expensive, I'm sure. So thank you, OTA.
8 And they also volunteered Grace because she needs
9 time to draft the documents. We couldn't have
10 done it without Grace, so Grace, thank you as
11 well.

12 With that, I'm going to just turn it
13 over to Gwendolyn. We're going to kind of tag-
14 team this a little bit. We want to get right into
15 the meat of it because there was a lot of
16 questions about the working group and the
17 different alternatives, so Gwendolyn.

18 MS. WYARD: Okay, quite the topic for
19 this early morning. Valerie, I'll just give you
20 the key there when to turn over. I want to jump
21 right into the definition of non-agricultural.
22 This is the little bugger that's put us into this

1 fine mess. The definition is ambiguous. The
2 first part of the definition, it has a couple
3 examples. Mineral, minerals have gone largely
4 uncontested. Bacterial cultures, on the other
5 hand, that's really been the stumbling block for
6 three plus years now. We haven't really moved the
7 discussion forward.

8 The very important discussion that
9 we've been having but it's been whether yeast and
10 other micro-organisms that are cultured on organic
11 substrate can be considered agricultural. That's
12 really where the focus of the discussion has been.
13 The second half of this definition is even more
14 complicated. The idea expressed is that a
15 fraction of an agricultural product can be non-
16 agricultural if the agricultural identity is no
17 longer recognizable. But how do we quantify or
18 qualify words like "identity" or "unrecognizable"?
19 Is it how it looks, how it tastes, how it smells?
20 Is it DNA analysis? Is it memory? How do we
21 recognize something? And if a picture tells 1,000
22 words, up in the left-hand, top left-hand corner

1 that's a quar plant and on the top right-hand
2 corner is a pile of white powder. I can't tell
3 what agricultural product that pile of white
4 powder came from but it is in fact, quar gum. And
5 gums are provided as an example as a non-
6 agricultural product. However, quar gum is listed
7 on 606 as an agricultural product.

8 Xanthan gum, however, is listed as a
9 non-agricultural synthetic in 605. That's an
10 orange down in the left-hand corner and you can't
11 see it, but that's a little bowl of kind of an
12 oily yellow substance. That's essential oil. I
13 can't tell that it came from an orange, but I know
14 that it came from an orange and natural flavors
15 are listed on 605 as a non-agricultural product.
16 Essential oils meet the FDA definition of a
17 natural flavor, readily available in organic form,
18 but certifiers do not require people to use
19 organic essential oil because they're listed on
20 605 as non-agricultural.

21 So the current fine mess, as I put it,
22 derives from the presumption that a substance

1 categorized as a non-agricultural substance
2 product, cannot be organically produced since
3 Section 205-102 requires that only an agricultural
4 product can be labeled as organic. However,
5 substances listed as non-agricultural are
6 available in organic form because they're either
7 derived from an agricultural product which fits
8 the definition of non-agricultural, or and this is
9 very important, they're manufactured using at
10 least 95 percent agricultural material by weight
11 or volume at formulation.

12 So one or more of their components, 95
13 percent are agricultural. The whole kit and
14 caboodle is not agricultural but it can be organic
15 as long as the rest of the five percent complies
16 with the composition requirements. So examples
17 that we have are natural flavors, yeast,
18 glycerine, that was the case with colors when they
19 were on 605. So the status of a substance becomes
20 hot to touch, because it determines its placement
21 on the national list, its legibility for
22 certification and whether it's subject to

1 commercial availability.

2 Another central and complicating factor
3 in this discussion is that some of the substances
4 listed on 605 and 606 such as kelp, yeast,
5 bacteria, are permitted as non-synthetic additives
6 and supplements in livestock feed. If they're
7 classified as agricultural, processors can use
8 them when they're commercially available in
9 organic form, while livestock producers must use
10 organic if they're agricultural, regardless of
11 their availability in the right quantity, quality
12 or form. So the composition requirements are
13 different between processed products for humans
14 versus the livestock composition requirement. It
15 creates an inequity if you have processors allowed
16 for commercial availability but livestock
17 producers would have to use the organic form.

18 So that's the problem in a nutshell.
19 This is the problem that this group tried to
20 tackle and Kim's going to provide you with
21 additional background on where we've come from.
22 So next slide, please, thank you. And I forgot to

1 do that next slide, but I already said all that,
2 so good morning, all right.

3 MS. DIETZ: Okay, very quickly, the
4 background for this. The Materials Working Group,
5 when we first started this, we took about a month
6 to put together a binder, and Gwendolyn has a copy
7 of that binder right there. It's a huge binder,
8 but we felt was important that we had all the
9 historical background on all of the issues
10 regarding ag and non-ag. So we went back and
11 gathered definitions. We went back and took past
12 recommendations from the Board.

13 So we really wanted to make sure
14 everybody started with the same foundation. Then
15 we took and became what brought forward to you
16 this paper. So just from a background from an
17 NOSB perspective, in July 2005, there was some
18 guidance on the definition of agricultural based
19 on taxonomy. At that time, yeast was classified
20 as a non-agricultural and not having any fruiting
21 bodies. So this issue even goes back before that
22 because I think Gwendolyn even through organ till

1 had brought up a discussion paper in 2003 or 2004.
2 So this is an ongoing issue.

3 In September 2006, public comment
4 demonstrated that yeast fit under livestock and
5 the recommendation at that time recognized yeast
6 to be agricultural. In October 2007, we had the
7 new paradigm, continuum approach and public
8 comment denoted that the past NOSB work was not
9 incorporated, so thus, we have the Materials
10 Working Group to help you so that you can fold in
11 all aspects. We know that we need to have a new
12 paradigm, but we also don't want to lose sight of
13 the past work that the Board has done.

14 And another one of the issues we have
15 is that this seemed to be focused around yeast,
16 when it's really not -- it is the problem but the
17 bigger problem is just the definition of
18 agricultural and non-agricultural. Next slide,
19 please.

20 Okay, from -- when we started this
21 project, we actually took that last paradigm
22 recommendation and we wanted to globally look at

1 synthetic, non-synthetic, ag, non-ag and a lot of
2 the other issues that needed to be resolved.
3 However, in the sake of time and focus, Dan and I
4 and the group said let's just work on ag and non-
5 ag right now.

6 So what we did is we focused the group,
7 we tried to develop a definition of agricultural
8 that would enable everything else to be non-
9 agricultural. So in the book or in the packet
10 that you have, there's a great appendices of the
11 different definitions of agricultural and Rich
12 Stewart did a great job of putting that together
13 for us.

14 Some of the discussion on if or how to
15 eliminate the need to distinguish between
16 agricultural and non-agricultural, and those are
17 the options that Gwendolyn is going to go through
18 in just a minute with you. We did have a lot of
19 disagreement on whether an agricultural product
20 must be produced on a soil-based farm which is
21 also going on in some other discussions in other
22 areas as well. And we also had ongoing

1 disagreement about whether all life is
2 agricultural if managed by persons for human or
3 livestock consumptions.

4 There's also included in our paper a
5 list of questions that need further clarification
6 and a lot of this discussion is -- will be vetted
7 out in those questions and the group is committed
8 to taking this the whole way and any other issues
9 that you want us to help you vet out as well.

10 So our next slide is options to
11 consider and we've put a chart together to help go
12 through all of these different options. We don't
13 have B plus or triple D or option F or organ tills
14 on there. We stopped at a point which we knew you
15 needed a recommendation or a paper to talk about
16 but we will take everything that's based out of
17 this meeting and take it back to the group and
18 come forward again with probably just a couple
19 options so that we don't have so many to consider.

20 MS. WYARD: Could you go back to A?
21 There we go. Okay, I'm going to run through A, B,
22 C, D, E and F, try to give you just the focus on

1 how it would effect commercial availability, the
2 definition of non-agricultural micro-organisms and
3 then the effect on livestock so that we can kind
4 of compare and contrast and get you comfortable
5 with what these options represent. But first, I
6 really want to drive home that these are ideas
7 that were discussed by the group as possible
8 scenarios. They're avenues to be explored.
9 They're not recommended actions. They're not
10 comprehensive and they're in no order of
11 preference, so there's the disclaimer. And also,
12 you know, additional analysis is needed in a huge
13 way on the potential impact of each of these on
14 the industry.

15 So this is really just to get
16 everybody's juices flowing, start looking at some
17 different solutions, possible solutions, some
18 working within the box, some outside the box. So
19 A is status quo. This is the current situation
20 that we're in. You know, it's been going on for
21 three plus years now. Most people don't really
22 find the current situation, the current definition

1 of non-agricultural to be acceptable. As we
2 worked through all the various options and worked
3 through our discussion, I think there were some
4 people that said, "Actually status quo is not so
5 bad, let's figure out a way to work this out
6 through guidance documents, other discussion.
7 Let's just keep it as it is," but, you know, we're
8 in a situation where the materials that are on 605
9 and 606 don't represent definitions. They don't
10 represent what's available out there in organic
11 form. So I think that most people agree that
12 there is going to need to be some regulation
13 change. We don't want to touch OFPA but we think
14 that there's going to need to be some regulation
15 change.

16 So with Option B, Option B drops non-
17 agricultural from the regulation all together.
18 Okay, it removes the definition and it also
19 removes the word "non-agricultural" from the
20 heading of 605. Commercial availability would
21 apply to all items listed on 605 and 606. Micro-
22 organisms would be retained on 605 unless they're

1 viewed as clearly agricultural. We still are
2 retaining the word, "agricultural" in 606 but
3 removing non-agricultural from 605. So basically,
4 it leaves everything listed on 605 as ambiguous.
5 We're not identifying it as being either
6 agricultural or non-agricultural.

7 The -- so it still leaves us needing to
8 determine what is clearly agricultural, which is
9 a potential problem, and it also is a potential
10 problem is if you don't clearly identify something
11 as agricultural, if it was on 605, could it be
12 organic, since 205-102 requires agricultural
13 products to be organic. And then as far as how it
14 affects livestock, it depends on you know, whether
15 the substance in question is listed on 605 or 606,
16 so that one wasn't really clear.

17 In C, the definition of non-
18 agricultural is retained, but it's changed to drop
19 bacterial culture. So mineral would be included.
20 The whole second half of the definition, the
21 problematic one that talks about isolated
22 extracted, that whole part is lopped off.

1 Bacterial culture is dropped, mineral is retained
2 as the only example.

3 So commercial availability, no change.
4 It applies to 606 listings, and then micro-
5 organisms would be petitioned for listing on 606,
6 because bacterial culture, the idea here,
7 bacterial culture would be dropped, so they would
8 be able to be petitioned to 606. And then, in
9 that case, it would require organic yeast to be
10 used in feed, and I put that asterisk there
11 because there's some question as to the
12 interpretation of whether or not supplements need,
13 in livestock, need to be organic.

14 There's clarification on the NOP Q&A
15 website that supplements do not need to be
16 organic, but there's also clarification that any
17 agricultural component of the feed needs to be
18 organic. So an example is a lick bucket. The
19 lick bucket, the mineral part of it wouldn't need
20 to be organic, but the molasses in there would
21 need to be organic. So, if you're requiring the
22 agricultural carrier in a supplement or a mineral

1 to be organic, one would presume that, if you
2 classify the supplement itself as agricultural,
3 that would also need to be organic. But there is
4 some question about that interpretation. So, and
5 if there was a clarification that supplements are
6 just either synthetic or non-synthetic, than this
7 whole question of livestock supplements,
8 agricultural yeast needing to be used, would go
9 away.

10 Okay, next slide. Option D, Option D
11 changes the definition of non-agricultural. It
12 retains mineral and bacterial cultural. It
13 applies -- commercial availability, then, would
14 apply to 606, but not to 605. And the definition
15 would be a substance that's not a product of
16 agriculture, such as a mineral, or a bacterial
17 culture. Micro-organisms would stay on 605, as
18 per the guidance on the agricultural definition.
19 So this Option D adopts the NOSB guidance on the
20 definition of agricultural. This is guidance
21 only. It's not a change to the OFPA definition on
22 an agricultural product. It's just guidance that

1 talks about agricultural products being something
2 that are managed by humans, and then it goes on to
3 describe the types of organisms.

4 It breaks out, it looks at what
5 organisms photosynthesize, which ones have
6 fruiting bodies. So this is the guidance that
7 basically draws a line between fruiting bodies and
8 non-fruiting bodies, and it separates out, it
9 basically draws the line as yeast as being non-
10 agricultural, because they don't have fruiting
11 bodies.

12 Micro-organisms, and then the effect on
13 livestock; there would be no effect if they're
14 viewed as non-agricultural, and listed on 605.
15 So 605 items, they could be used in products that
16 are going to be organic, but items listed on 605
17 wouldn't have to be sourced in organic form.

18 E adds a definition of an agricultural
19 system. It adds a definition of an agricultural
20 system, and it adds a definition for a non-
21 agricultural system. The idea here is that, in
22 considering public policy, and the intention of

1 Congress, it becomes necessary to further define
2 the systems of agriculture that express the
3 principles of organic farming. So for this
4 reason, a definition of agricultural systems would
5 be added, and this change would effectively remove
6 the issue of what is agricultural, and it would
7 focus on which products could be produced by an
8 organic system.

9 The definition of an agricultural
10 system would then determine the environments where
11 organic integrity could be established, and
12 further, this definition prevents the unrelenting
13 expansion of organic into systems in which the
14 regulation has not provided standards for. This
15 option that is presented, the definition, in this
16 one, is that it's a land-based system that
17 cultivates soil-producing crops, livestock or
18 poultry. So this option would only remove the
19 issue of what is agricultural if everyone would
20 agree that an agricultural system is a land-based
21 system that cultivates soil producing crops,
22 livestock, or poultry.

1 Micro-organisms, in this case, would
2 remain on 605 unless they're raised in an
3 agricultural system, and non-organic micro-
4 organisms would be allowed in feed, again, unless
5 they're from an agricultural system. In F, we are
6 merging 605 and 606. We're removing commercial
7 availability from the regulation entirely, gone.
8 It's either organic, or it's on the list.

9 Micro-organisms would be allowed as
10 non-organic. They could be petitioned for removal
11 specific to -- they could be petitioned for
12 removal specific to available -- if they're
13 available as organic, and then micro-organisms
14 would remain on 605, 606, allowed as non-organic,
15 removed, and if they were removed, the impact is
16 not entirely clear.

17 So the idea here is that we're living
18 in a world where, you know, our economy is based
19 on supply and demand, and commercial availability
20 doesn't work. So if you're using, either an
21 organic ingredient, or something that's on the
22 National List, and if the item on the National

1 List becomes available, then you petition to
2 remove it, and we improve the system and the
3 process for removing items from the National List
4 once they become available in organic form.

5 So that's an overview of the options,
6 and I want to -- as far as, at the end, with
7 questions about these options, we want to invite
8 members of our group up to address the various
9 questions, because, you know, we all collectively
10 had a hand in creating these different options,
11 and certain individuals are going to be able to
12 explain them much better than I can. So once we
13 get to that point, all of you Material Working
14 Group people out there, be ready, we might bring
15 you on up here.

16 MS. DIETZ: Next slide. So in summary,
17 you can see this is a very confusing issue.
18 Clarification is crucial, and the list needs to be
19 cleaned up accordingly. And that, as you can see
20 by all the different options, and definitions and
21 list requirements should encourage the development
22 of organic food ingredients and feed. Changes to

1 the regulation should be minimized, and resolution
2 must be consistent with OFPA.

3 And this is for you folks; the NOSB
4 needs to address the discussion questions, and
5 further explore the impacts of the options
6 presented, and explore additional options, and we
7 certainly are there to help you with that, but our
8 vision, I guess, is that we take the fact, we
9 summarize even more so a couple of options, and
10 work closely with the NOSB to help guide us on
11 what you need from us next. And we're certainly
12 willing to do that.

13 So with that, the discussion questions,
14 and I know, just based for time, you get Nancy.
15 Dan?

16 CHAIRMAN DELGADO: Any questions? Dan?

17 MEMBER GIACOMINI: Yes. I, fortunately
18 or unfortunately, I'd like you to touch on one of
19 the sections of the document that you didn't
20 discuss that's outside of the options. One of the
21 debates that we had at the last meeting was the
22 concept of agricultural synthetic. I know, as a

1 member of the committee, and from reading the
2 document, it looks like a product can lose its
3 agricultural nature, and that an agricultural
4 product can become a synthetic, according to this
5 data, where it fits in our definitions.

6 Would -- could you, like, discuss that,
7 and would you say whether -- is that a -- sort of
8 the mind of the majority of the people, members on
9 the committee, after that document was prepared?

10 MS. DIETZ: Would you just go to the
11 next slide, because that is one of the questions
12 that we do need to clarify. So if you look down
13 on the third one, Can agricultural product also be
14 synthetic, if so, can it also be certified
15 organic? So yes, we did discuss that in length.
16 I don't -- unless there's somebody else here, I
17 don't think we actually came up with a definite
18 answer. This was a question that we do need to
19 answer to move forward, and I can't say whether or
20 not we had a majority that felt that it could or
21 couldn't. By the time we got to these questions,
22 we were on some of the last calls. So I would say

1 that we'll take that back, and we will answer
2 these questions, as well, and hopefully, that's
3 good enough. Go ahead.

4 MS. WYARD: I don't have an answer, but
5 I just want to point to a little bit more of our
6 discussion, and also to a committee working draft,
7 an NOSB committee working draft document that
8 you'll receive in your notebook. And it goes back
9 to, it's the processing, handling and labeling
10 committee working draft from 1993 on the
11 organization, the setup of the National List, why
12 things were placed where they were placed, and the
13 thinking behind agricultural, non-agricultural,
14 synthetic, and non-synthetic.

15 And one of the ideas in that document,
16 which I just misplaced underneath of everything -
17 that was clever of me. Here we go. This is
18 verbatim from that document. It says, the term
19 synthetic should not include the effects of normal
20 food processing activities. In other words, the
21 term synthetic should not be applied to an
22 otherwise non-synthetic substance that's

1 formulated or manufactured by processing, as
2 processing is defined in the Act. In this
3 respect, there's no such thing as a synthetic --
4 wait, that stopped.

5 Okay, now I go on and say, "in this
6 respect, taking that into consideration, there
7 would be no such thing as a synthetic agricultural
8 product, but a processed agricultural product.

9 So, we have to keep in mind that, you know, that
10 second part of the definition of non-agricultural
11 is very, very important. If you decide to remove
12 that second part, you're basically -- unless you
13 provide guidance elsewhere, you're saying
14 something starts out as agricultural, it's never
15 going to lose its agricultural status. That
16 second part is the part that you would want to
17 point to and, you know, maybe work on further
18 defining words like recognizable and identity.
19 Can the agricultural ever be processed out of the
20 agriculture?

21 And with the definition of processing
22 that we have, lopping, chopping, mechanical, I

1 mean, it goes on and on and on, and ends up with
2 saying, and otherwise manufacturing, we don't put
3 any restrictions on processing. Some practices,
4 yes, but generally speaking, you know, you can
5 process the beegeeges out of something, and call
6 it organic. So we have to be really careful if
7 you -- you know, if you say something is
8 synthetic, and it's organic. So, and I've always
9 said, it's a processed agricultural product,
10 versus a synthetic, because you have chemical
11 changes.

12 If you look at the definition of
13 synthetic, chemical changes occur, whether you're
14 talking about the Maylard reaction, you know,
15 cleaving of your -- if you're taking triglyceride,
16 and, you know, breaking your fatty acids from your
17 glycerine backbone, chemical change happens. It's
18 my new bumper sticker. So I mean, that's just
19 some food for thought in all of that.

20 CHAIRMAN DELGADO: All right, thank
21 you. Any questions? We have the Secretary,
22 followed by the Vice Chair.

1 SECRETARY HEINZE: I do not have a
2 question, but I do have a thank you. Having
3 participated on most of your calls, the amount of
4 work contributed by everyone on the Material
5 Working Group is astounding. I mean, you met for
6 months every week. Everyone brought everything to
7 those calls, and you had hefty debate. So it is
8 greatly appreciated, and we're looking forward to
9 partnering with you as we, hopefully, wrap this up
10 sooner rather than later. So thank you.

11 MS. DIETZ: You're welcome.

12 CHAIRMAN DELGADO: Jeff.

13 VICE-CHAIR MOYER: I do have a
14 question, Kim, but before I give you the question,
15 I'd like to second what Katrina said. Having not
16 been on any of these calls, but knowing the vast
17 amount of work that these calls take, I also
18 appreciate, along with the rest of the board, all
19 the work you've done. But my question is really,
20 I guess, for Gwen. Yesterday, you talked about
21 the Tilth option, which was sort of a D plus, and
22 somebody, I think it was Emily, talked about a B

1 plus version. How do those things change what you
2 have in this summary chart, or what other things
3 are in there that we might consider looking at?

4 MS. DIETZ: And we'll actually take
5 those options back, as well, and add them on, and
6 delete some off on these options, so that it's
7 clear as a group recommendation, because we didn't
8 look at the Tilth option, or the D plus, or the B
9 as a group, so just out of process, we'll take
10 that back, as well.

11 MS. WYARD: Okay, Valerie, can you go
12 to the next slide for Option D? As far as
13 addressing Emily's B plus, I would call Emily up
14 here to cover that one. So Option Tilth is a
15 variation of D. And the major changes is that we
16 -- Option D adopts the 2005 clarification on the
17 definition of agricultural, and that it goes on to
18 split hairs, in my opinion, between the -- you
19 know, basically looks at the taxonomy, and says,
20 you know, this one photosynthesizes, and has
21 fruiting bodies, therefore, it's agricultural, and
22 this one does not, therefore, it's non-

1 agricultural. So we did not accept that entire
2 guidance on the definition of agricultural.

3 The part that we did adopt, and again,
4 this was guidance, and I think there might have
5 been a misunderstanding yesterday. We're not
6 suggesting a change to the definition of
7 agricultural product at all. We're simply
8 adopting guidance that would further explain that
9 agricultural product, raw or processed, intended
10 for human or livestock consumption, there's the
11 OFPA definition. We're saying, further guidance
12 would say that agricultural products are those
13 that are managed by humans, and managed by humans
14 is the intentional act of gathering, producing,
15 raising, growing domestically in designated wild
16 harvest areas by persons for human or livestock
17 consumption. So that's the first changes that we
18 have lopped off part of that guidance.

19 We've also changed the definition of
20 non-agricultural in Option Tilth, and that
21 definition was a substance that's not raised in or
22 derived from an agricultural system, such as a

1 mineral, or an atmospheric gas, and then we've
2 gone on, and we've said, for the purposes of this
3 part, an non-agricultural ingredient is also
4 anything technically impossible to be organically
5 produced. That's the same definition that Emily
6 has in B plus, but in Option D, we're still
7 retaining -- we're removing the word non-
8 agricultural from the 605 heading, so 605 become
9 just non-organic ingredients; 606 are agricultural
10 products.

11 We have a definition for non-
12 agricultural. 605 is for ingredients, substances
13 that cannot be organic. So in that list, you
14 would have minerals, atmospheric gas, things that
15 would be clearly non-agricultural. You also may
16 have items that are not agricultural, but perhaps
17 they could be organic, so citric acid. Because
18 currently, now in time, it's not technically
19 possible to have organic citric acid. People are
20 working on it, but it requires the use of
21 materials that aren't on the National List. So
22 that would be an example of something that

1 technically can't be -- you know, be produced in
2 organic form, now in time, but that could change.
3 So then citric acid would go over to 606 once it
4 becomes available in organic form.

5 Option B plus just applies commercial
6 availability to both 605 and 606. And Emily, did
7 you want to -- Emily?

8 CHAIRMAN DELGADO: Before we --
9 Katrina, you had a question for Gwen.

10 SECRETARY HEINZE: I have a question
11 about Option Tilth.

12 MS. WYARD: Okay.

13 SECRETARY HEINZE: So, if I understood
14 what you just described correctly, would that mean
15 that some of the items that we've recently put on
16 606 might better be on the --

17 MS. WYARD: 605?

18 SECRETARY HEINZE: -- the reclarified
19 605, so, for example, like, I'd have to think
20 through some of the materials, but maybe something
21 that couldn't be processed, and I'm going to make
22 this up, so this may be factually incorrect, but

1 I'm hypothetical here, maybe like the soy protein
2 concentrate, right, that starts as an
3 agricultural, goes through some processing, cannot
4 today be certified organic, but one could imagine
5 in the future that it might be.

6 MS. WYARD: That's not --

7 SECRETARY HEINZE: Under Option Tilth,
8 might that better exist under 605?

9 MS. WYARD: Yes, that's the idea, and
10 it's an interesting discussion, because there are
11 some people that feel that 606 items, they're --
12 they're just agricultural. Whether or not they
13 can, you know, maybe they're not available at all,
14 because they can't be. For example, fish oil.
15 The standards aren't there.

16 SECRETARY HEINZE: Right.

17 MS. WYARD: Or they're available, but
18 not in the quantity, quality or form. So there
19 are some people that, it's an agricultural
20 product, it goes on 606, period. But there's
21 another school of thought that you can't put --
22 that anything that's on 606, it should be able to

1 be available in organic form. It should be able
2 to make or source it in organic form.

3 If you're requiring operators to source
4 it, well, there are no standards for it. If it's
5 not out there as organic, it shouldn't be on
6 there. So those are some --

7 SECRETARY HEINZE: But certainly some
8 of the recent comments we've had about, maybe
9 there's some processing aids, for lack of a better
10 word, that are used to make some of those 606
11 items, those might better belong on 605. It's an
12 interesting option.

13 MS. WYARD: Yes, that's what we were
14 getting at. So, fish oil, for example, would be
15 on --

16 SECRETARY HEINZE: That's lots to
17 debate.

18 MS. WYARD: Yes, yes.

19 CHAIRMAN DELGADO: We appear to have
20 two more questions, and I'd just remind you of the
21 time. It's 9:25 at the moment, and please be
22 brief. We'll start with --

1 MALE PARTICIPANT: I can wait till
2 after.

3 CHAIRMAN DELGADO: Very good. Hu?

4 MEMBER KARREMAN: I was just wondering
5 if it's possible to hear from Brian Baker from
6 OMRI, because they review a lot of materials. Do
7 you have any input?

8 CHAIRMAN DELGADO: Can we have a
9 specific question, Hu?

10 MEMBER KARREMAN: Well, which option
11 would you go for? If you want to hold off on --

12 CHAIRMAN DELGADO: Brian, excuse me.
13 Brian, I think we can skip on that. This is a
14 discussion item, and we would need a precise
15 question to address that. So I apologize for
16 that, and I would like to go for that. I'm sorry,
17 we're moving forward with --

18 MEMBER KARREMAN: I did ask the
19 question, actually.

20 CHAIRMAN DELGADO: Let's go ahead,
21 please.

22 MR. BAKER: The answer is real short.

1 OMRI sent it to the Advisory Council; we're
2 discussing it. We're not -- we are open to all
3 the options, and even those that are not put
4 forward today.

5 CHAIRMAN DELGADO: Great, appreciate
6 that shortness. Okay, we'll proceed with --

7 MS. BROWN-ROSEN: So you wanted me to
8 say what was different about B plus compared to
9 the --

10 CHAIRMAN DELGADO: Yes.

11 MS. BROWN-ROSEN: It's very similar,
12 it's very similar. The only difference really is
13 that commercial availability applies to 605 -- did
14 I lose you? You're scrolling up on the chart,
15 okay -- on B, so basically, it's the same as B,
16 you drop the title non-agricultural. So 605 is
17 non-organic substances. We apply commercial
18 availability to 605 and 606. So to me, what that
19 does, I mean, it does all the benefits of what
20 Gwendolyn was trying to promote there, same
21 definition, but you don't have this crisis of,
22 does it belong in 605 or 606. It's not as hard a

1 decision for the Board in the sense that, you
2 know, wherever it is, if there's organic sources
3 available, it has to be used.

4 And the fact that it's not clearly
5 identified as agricultural, non-agricultural in
6 605, I don't think that's a big problem. Mr.
7 Siegel thinks it's a problem, because he thinks
8 that use must be identified as agricultural in
9 order for it to be sold as organic, but with the
10 proposed definition, I think it works. I mean,
11 you have -- if it can be made organically,
12 technically possible, then actually we would be
13 considering it agricultural.

14 So, I mean, you know, not everything in
15 the world is on 606, and yet we certify all these
16 things. So, I think it's got flexibility. We
17 probably need lawyers to look at this, but I just
18 think it makes the decision making easier, and it
19 -- we also did do these decision trees, which we
20 can revise to show these new options. I would
21 encourage you to go back to look at those. I
22 think it will become much easier to work through

1 those once we've cleaned up this type of
2 definition.

3 CHAIRMAN DELGADO: Thank you. Follow-
4 up question. Yes, Joe?

5 MEMBER SMILLIE: It's a general
6 question to the group, and I'm sure you guys
7 thought of this, but did anybody consider --
8 because again, organic is like, considered a soil
9 base, but yet, you can do things organically for
10 some of these things that are not considered
11 agriculture.

12 Did anybody consider going beyond 607,
13 and creating a 608 for non-soil based, possibly
14 organically certified or grown products, such as
15 the infamous yeast, and many others?

16 MS. GERSHUNY: Well, we didn't discuss
17 that specifically, although Gwendolyn did make it
18 clear, I think in her, you know, not technically
19 possible discussion that some things, we might
20 say, are not technically possible, because we
21 don't know how they make bacteria or, you know,
22 what all the ingredients are. There might need to

1 be standards developed, you know, we might
2 decide, or you might decide this is, actually,
3 something we want to support or not, so I mean,
4 that's where you could put new standards. You
5 know, you could develop other sections, or in the
6 body of the processing rule, too, if it was felt
7 to be within the scope.

8 I mean, you know, we have seen a huge
9 expansion of scope in, you know, cosmetics,
10 shampoo, you know, all this stuff. So, I mean, if
11 we had standards, and if there was agreement, that
12 would be technically possible.

13 CHAIRMAN DELGADO: Okay, any other
14 questions? I just want to say that also I'm
15 really grateful for your participation to the
16 group, Kim, Gwen, the OTA as well. This is a
17 fantastic example of how the public can come in
18 and provide constructive, synthesized input, and
19 we're looking forward to the summary of the three
20 solutions so we can review those. Thank you. Any
21 other comments on your part, Mr. Chair?

22 MEMBER GIACOMINI: Materials is

1 complete at this time.

2 CHAIRMAN DELGADO: Thank you very much.
3 Okay, we move onto the next topic, and that
4 involves the Compliance, Accreditation and
5 Certification Committee, and Mr. Smillie?

6 MEMBER SMILLIE: Well, in that vein,
7 again, the public input to NOSB is the fuel on
8 which we run. I mean, basically, we can sit as a
9 group, and come up with our discussion papers and
10 recommendations, but it's the input, that's the
11 purpose of this meeting, and in that vein, that's
12 where we are in the Certification, Accreditation
13 and Compliance Committee's discussion paper.

14 And I just make sure everybody
15 realizes, it's a discussion paper, not a
16 recommendation yet, because we are seeking to
17 build a public record on this very important and
18 complex issue. We want to hear all the voices,
19 and even though we really want to get to a place
20 to make a recommendation, we don't want to rush.
21 We want to make sure that all the voices that are
22 out there are heard, and given time, because it is

1 a global issue. I think it's one of the things
2 that really affects the global organic
3 agriculture, not just the U.S.

4 So we want to hear that, and basically,
5 where we are at in the process is we are really
6 getting fabulous input. We believe that the first
7 discussion paper was presented. The overwhelming
8 response that we heard was that we want more
9 detail. We want to hear more -- you know, we
10 don't understand some of the terms used. We don't
11 understand some of the concepts, such as a single
12 OSP, and an internal control system, and we want
13 more detail on that.

14 So the committee, especially the lead
15 author, Tracy, who will take over this
16 presentation in a second, basically went back and
17 provided our second discussion paper, which is
18 part of -- it's Part 2 of the overall approach,
19 and basically, we had a very robust discussion
20 within our Certification Committee, which consists
21 of six people. I won't go through it all, but
22 it's listed, and we said, you know, there's also

1 a lot of discussion on a lot of these issues, and
2 what we want to do is go back, and be really
3 specific about which questions we want the
4 community, you know, the global community to
5 answer. So we created a list of questions that's
6 part of this document that we are seeking feedback
7 on.

8 So we are, once again, looking for the
9 public to give back to us direction, and we want
10 to continue that dialogue. So now I think I'll
11 let Tracy take over. Tracy is the principal
12 author, and has done enormous amounts of work, and
13 looking into globally, again, all of the people
14 who have -- whether it's ISO documents, or, you
15 know, years of work that IFPO has done on this
16 issue, and what she'll do now is present this
17 document once again, and we are seeking input on
18 it.

19 MEMBER MIEDEMA: Thank you very much,
20 Joe. Mr. Chair, my colleagues on the Board, and
21 members of the audience, I wanted to first start
22 out by thanking the people here who have submitted

1 comments, both written, and have come up to the
2 podium to present their comments. There was a lot
3 of commentary unrelated to the specific content of
4 the guidance document, and I wanted to address
5 that first. The guidance document itself is quite
6 lengthy. It's highly detailed. We really tried
7 to get into the nuts and bolts of how these
8 internal control systems work.

9 There's a lot of question marks around
10 whether or not adequate organic certification can
11 be achieved through some sort of sampling
12 protocol. And that's what this document gets
13 into, and I want to take time here, with my
14 colleagues on the Board, to walk you through that,
15 but it's important, first, that I acknowledge some
16 very strong opinions that are coming to us over
17 these couple days, and I expect to continue to
18 flow in.

19 First of all, I want to thank the OTA
20 task force. I've been participating with that
21 group as a non-voting member for about a year now,
22 and Grace Gershuny, Kim Dietz, and Tom Hutcheson

1 are really leading up that effort, and I expect
2 they'll be submitting their comments tomorrow, and
3 the work that this task force is doing.

4 And I'll tell you, you know, I've
5 really been working lock step with them. They've
6 been willing to take our questions from the
7 committee, and draw on the strength of 20 people
8 to flesh out those questions. Something -- you
9 know, for instance, how do we address conflict of
10 interest in an internal control system. And so
11 you'll see some strong similarities between what
12 appears here in the discussion documents, and, for
13 instance, the OTA task force.

14 Many others, you know, like I said,
15 about 20 people on that group. I wanted to thank
16 Jim Riddle for his comments. You know, there is
17 a characterization that this idea of looking at
18 this issue as a multi-site certification is
19 somehow a justification -- I think you said, a
20 justification for one certifier's insistence on
21 retailer certification. And you know, Jim, it's
22 just -- that's just not the truth. That's just

1 not where this is coming from. You know, what was
2 put on trial in October, 2006 with the appeal
3 decision, was whether an internal control system,
4 you know, could serve as some sort of proxy for
5 inspection. And it turned out, when that appeal
6 decision came down, that there were stakeholders
7 affected throughout the industry.

8 And, you know, grower groups, it turns
9 out they were on shaky legal ground. It turned
10 out retailers that were using this construct were
11 on shaky ground, and out of basic fairness, these
12 multiple stakeholder groups need -- you know, need
13 to be looked at. So, you know, there's just no
14 hidden agenda. And I want to dispel that right up
15 front.

16 I want to thank the work of the
17 National Organic Coalition. Leanne, Joe Mendelson,
18 Lynn Cody, I have felt like your following of this
19 issue has been very thoughtful, very regulatory
20 based, and I just know that we're reading those
21 comments very closely.

22 Harriet, you continue to stay really

1 locked into this discussion, and I have followed
2 your comments even before this came up. As a
3 committee, you had given a comment. You were, I
4 think, the very first person to comment, and I did
5 want to respond to one thing you said about the
6 high turnover rate among retailers, and that
7 somehow being a barrier that's unique, and could
8 pose problems for a sampling protocol, or an
9 internal control system. And just, you know,
10 somebody who works at a farm, and sees seasonal
11 labor, and an organic farm, a certified organic
12 farm, I see an awful lot of turnover every year
13 with seasonal employees coming through, so I don't
14 know if there's data to support that, but if you
15 have it, I'd be happy to take a look at it.

16 CCOF, and Peggy Miars, again, a group
17 that's been really engaged in this, and generally
18 speaking, is not amenable to grower groups. I
19 think yesterday, you characterized CCOF's position
20 as wanting to phase out the concept of grower
21 groups. Sam Welch, my takeaway is that you're of
22 a similar mind, that they're just -- it would be

1 better if there was always direct independent
2 third party inspection of the smallest divisible
3 unit, which -- well, you're shaking your head, so
4 I want to make sure I don't mischaracterize your
5 position there, and I'll let you speak for
6 yourself later.

7 I found, of course, an extremely
8 important stakeholder in this discussion. They
9 represent more of these grower groups than any
10 other organization around the world. They have
11 been the leaders, bar none, in the development of
12 internal control systems, and really, you know,
13 people getting together, clustering together under
14 very rigorous criteria, and bringing organic to
15 the marketplace.

16 Some others that have also weighed in,
17 Pennsylvania Certified Organic, yesterday, I
18 wanted to respond to one comment, which was, you
19 know, the idea of the 36-month phase-in, and
20 really, that was to allow folks to comply with the
21 clustering of production -- of members, and of
22 production units. The status quo can't go on.

1 You know, there are some problems out there in the
2 way grower groups are run, and I'm going to get
3 into that in a second.

4 But, you know, it's also, we don't want
5 to yank the rug out from people. We've seen that.
6 It happened. There was a big uproar. We're not
7 going to take that strategy. So that's simply to
8 allow a smooth assimilation of new standards, or
9 new guidance. Accredited Certifiers Association,
10 I know you're staying really close to this issue,
11 and have very strong opinions about who should
12 have access to an internal control system as a
13 means of organic certification.

14 Lastly, Marty Mesh, I will be very
15 disappointed if I don't get to hear a comment from
16 you. You and I have had lots of very interesting
17 conversations, so I look forward to continuing
18 that. All right, well, so getting into the
19 document itself, the idea of disadvantaged small
20 holders having -- being the only ones to be able
21 to get together as a group and get certified,
22 flies in the face of rigorous organic standards.

1 I absolutely believe we should be
2 promoting people around the world who are
3 disadvantaged, and/or small holders being grower
4 groups, but not because they're small or
5 disadvantaged, but because they're organic. And
6 if others can use that same construct, and still
7 be organic, than the construct works. So what we
8 have on the screen up there is a big fat table of
9 contents of what this document goes through, and
10 what have we got here, maybe 10 minutes left?

11 CHAIRMAN DELGADO: We have five
12 minutes.

13 MEMBER MIEDEMA: Five minutes, okay.
14 So let me just highlight some areas of the
15 document that, you know, where there was some real
16 depth of thinking. The first is, you know, what
17 conditions have to be in place before you can even
18 consider multi-site operation, you know, to seek
19 USDA certification. So at the beginning there,
20 you know, you must be organized as a person
21 according to 7 CFR 205.2.

22 So if you have a bunch of disparate

1 parts, first of all, you've got to legally be one.
2 Second, you need to be seeking certification with
3 a certification body that can actually handle the
4 job. We've kicked around different ideas for how
5 to get there, you know, should it be a separate
6 category of certification. That idea has been
7 tossed out there, and I've heard the program isn't
8 necessarily amenable to that for some sound
9 reasons, but we know it's got to be a certifier
10 that knows how to peer into complex organizations,
11 and they have to be able to demonstrate that to
12 the NOP. The practices of these multi-site
13 operations must be uniform, and reflect a
14 consistent process or methodology using the same
15 inputs and processes.

16 For growers, participation in the
17 multi-site operation is limited to those growers
18 who sell all of their organic production through
19 the group. Multi-site operations must use
20 centralized processing distribution, marketing
21 facilities and systems, and one last item here
22 that's important; record keeping protocols must be

1 consistent. You can't have the record-keeping
2 look different from place, to place, to place,
3 because you're going to have one outside
4 inspector. Your internal surveillance and review
5 is going to happen through the internal control
6 system, and consistency is going to be really
7 important.

8 Okay, the next part of the paper really
9 talks about the organization within the multi-site
10 certification and, you know, I threw in this term
11 clustering, so the clustering of members or
12 subunits in the production unit. And what we did
13 is we came up with quite an exhaustive list of
14 what it takes to get together. You must be bound
15 by a shared training regimen, for instance. You
16 must operate under the single organic system plan,
17 and that particular section that relates to your
18 piece of the puzzle.

19 Now, that's going to require an
20 adjustment to the status quo where members might
21 be acting as autonomous members under a single
22 OSP. You know, going forward, members are really

1 going to need to organize into production units to
2 share best practices. And, you know, I know there
3 was a feeling on the part of IFPO that maybe the
4 training regimen we proposed was overly
5 burdensome. I would push back on that, because I
6 think training is really fundamental to this
7 working.

8 Next, we go into the facility or site,
9 and an area that I heard everyone on this board,
10 in our comments and discussions we've had in the
11 hall, et cetera, and I heard members of the
12 audience say, there's not enough detail around
13 retailer certification. The section that deals
14 specifically with retailers is quite brief in this
15 document. It's found on page 4. Grower groups
16 have had 20 years to flesh this stuff out.
17 Retailers have had about four years. So yes,
18 there's history that's going to need to be drawn
19 on for grower groups, and there's going to be
20 criteria that are going to continue to need to be
21 fleshed out.

22 OTA has volunteered to pull together a

1 task force in that regard. So, you know, we know
2 we've got additional resources. Just moving
3 through quickly a few other highlights; we're
4 proposing that, in year one, this is looking at
5 sampling protocol. I'm jumping ahead to now, year
6 one, 100 percent inspection rate of all production
7 units, sites or facilities. And that's giving
8 credence to the importance of an extremely
9 thorough audit off the bat, and an understanding
10 of how much risk there is, because, you know,
11 later, and I spent a lot of pages talking about --
12 a lot of information here talking about risk
13 factors.

14 We need to get to those, and the only
15 way to do that is to look at all the parts right
16 off the bat. Segueing in there, moving into risk
17 analysis, I believe it's 19 points we called out
18 that help guide inspection. Inspection cannot
19 just be a random scatter-shot thing. We need to
20 focus our attention on hot spots, but it's not
21 enough to just pinpoint. We do need a random --
22 we need to keep people on their toes. And people

1 need to know that, at any given year, you might
2 get randomly selected. So, you know, the idea
3 there was that, of the people selected for
4 inspection, 25 percent would be random.

5 Another area the program asks for more
6 help with, and fleshing out, was the role of
7 conflict of interest, and so we exhaustively went
8 into that. Jim, I know that was something that
9 you said you wanted to see more data on, and I
10 just -- I want to direct you to, you know, pages
11 8 and 9. There's a lot of information in there.

12 And then lastly, we gave some pending
13 issues that reflect some of our internal
14 discussion that we were having in committee, and
15 some unresolved questions among committee members
16 that we continue to invite the public to respond
17 to.

18 CHAIRMAN DELGADO: Okay, any questions
19 from the Board? Yes, Jennifer?

20 MEMBER HALL: First, I'd like to thank
21 Tracy. She did an exhaustive search, and real
22 outsourcing to get a lot of information and input

1 to compile this guidance document. But I'd also
2 like to represent a faction of the committee that
3 did have a different voice, and as a result of us
4 not being unified, that is why the pending issues
5 are reflected here instead of kind of more
6 traditional minority opinion.

7 I would say that all of us -- and I
8 don't want to speak for everybody, but I think
9 that there is a half of the committee that
10 definitely sees the value in grower groups, and
11 sees the strength of a really good internal
12 control system, and Tracy did a great job of
13 really adding merit to that risk assessment, and
14 all the different components of that.

15 So we decided, instead of doing a
16 minority opinion, to try and get feedback on the
17 components that a variety of us, for different
18 reasons, had different questions about, and to
19 solicit those in a question format to try and get
20 specific feedback. So I just kind of wanted to
21 put that out there that, as a committee, like Joe
22 said, there was a lot of robust discussion, and I

1 feel good about what's put out here, but I'm also
2 very genuinely thankful for the feedback that
3 we've gotten that will help direct us to our next
4 phase.

5 CHAIRMAN DELGADO: Any other questions
6 from the Board?

7 MEMBER FLANN: I'd just like to
8 comment.

9 CHAIRMAN DELGADO: Barry, please.

10 MEMBER FLANN: I just want to echo what
11 Jennifer just said, since I'm part of that half
12 that she just described.

13 CHAIRMAN DELGADO: Very well. Tracy?

14 MEMBER MIEDEMA: Just one last note, I
15 forgot to thank Oregon Tilth, and I thought it was
16 noteworthy in yesterday's comments that both Tilth
17 and IFOAM are not uncomfortable with the strength
18 of an internal control system's role in other
19 sectors of the organic world. They believe --
20 seem to believe that it's rigorous enough to stand
21 up in different sectors of the industry, and
22 happen to be the two organizations here who,

1 correct me if I'm wrong out there, represent the
2 most grower groups. I just wanted to add that.

3 CHAIRMAN DELGADO: Okay, any other
4 questions? Katrina, followed by Dan.

5 SECRETARY HEINZE: I haven't been part
6 of your discussions, but I did want to weigh in as
7 someone who is very familiar with internal control
8 systems. It's obviously something that a large
9 food processor, like the company I work for, uses
10 to manage our food safety programs, which,
11 arguably, are very critical. And I have a great
12 belief in the construct. It allows us to have
13 very firm control over the foods we produce. So,
14 from that perspective, I very much support the
15 effort that the committee has made in support of
16 that type of construct.

17 I am concerned about how the expansion,
18 outside of grower groups, would be viewed by our
19 organic community. Certainly, that is not a
20 technical, you know, perspective, but I think it
21 is a factor that we need to weigh as we make a
22 recommendation, because ultimately, we are a

1 marketing program, and we get judged by the
2 comfort our consumers have in what we do.

3 And I recognize that that's perhaps an
4 unresolvable problem, right? That it's a
5 construct I very much believe in. I think it can
6 work. I think it can work for all the different
7 types of groups that you've talked about, right?
8 Grower groups, retailers. It can absolutely work
9 in all those cases. I'm just not sure our
10 community will accept it in all those cases.

11 So I just wanted to get that
12 perspective out, because I do think that factor
13 weighs in the recommendation that we make, much as
14 we might get frustrated by that.

15 CHAIRMAN DELGADO: Do you have a
16 response?

17 MEMBER MIEDEMA: Yes, I do. It's an
18 important question, it's a worthwhile question,
19 and frankly, it can be looked at now. This is not
20 a future thing we're talking about. There are
21 retailers today certified using this construct.
22 So we don't have to wait until the future to find

1 out, you know, through some sort of survey.

2 Lots of us have done informal surveys.

3 Sam, I know you have your own -- you've talked to

4 people, and believe that consumers are not at all

5 friendly to the idea. I have found there -- I

6 have had absolutely different findings at trade

7 shows. I've just used those opportunities

8 interacting with people to pose a question. So,

9 you know, if somebody has formal data, independent

10 third party data, that helps us get to that

11 answer, I think that would be great to bring to

12 bear.

13 CHAIRMAN DELGADO: Dan.

14 MEMBER GIACOMINI: Thank you. And

15 again, thank you, committee, for all the work

16 you've done on this. But I think, and I'll try to

17 be extremely -- extra brief, because I think I'm

18 sort of echoing Katrina's comments. But to say it

19 slightly differently, I think, for me, this comes

20 down to two questions, and it comes down to a

21 question of concept, and it comes down to a

22 question of scope.

1 I think it's one thing -- the ICS, as
2 you discuss, is sort of the means that you're
3 using to get there, but are we -- do we have
4 agreement within the organic community, consumers,
5 producers, stakeholders, regulations, and
6 everything else, that a -- that a farmer that
7 makes \$5,001 in the United States has to pay for
8 an annual inspection to get the benefits of being
9 organic, but yet, I don't even know if they exist,
10 Fair Trade Coffee in South America gets a bit of
11 an exemption. And how are we going to handle that
12 structure?

13 And we've had a lot of debate, and
14 we've had guidance documents and things. I think,
15 then, to take that to the next phase on a scope
16 level, it is the same ICS format, but it's a
17 different question, and different refinement, and
18 really getting into the meat of the issue of how
19 to make sure that it's going to work, and be
20 accepted, just to pick another company, and I know
21 they do exist, that how this thing will allow
22 Whole Foods not to have to have every store

1 inspected annually.

2 I think there's a difference between
3 the concept and the scope. We had public comment
4 yesterday asking us to just -- the committee to
5 just go back, finish off the grower groups, and
6 then bring up multi-site, and I'm not so sure that
7 I see a lot of -- that I see a problem in going
8 that route.

9 CHAIRMAN DELGADO: Joe, followed by
10 Jennifer.

11 MEMBER MIEDEMA: I just first wanted to
12 respond to the 5,000 hurdle that you threw out.
13 You know, what we're talking about here is the
14 exemption for a producer that produces less than
15 5,000, and that gets thrown around a lot as sort
16 of the, let's just limit this to producers that
17 grow less than 5,000. And, you know, let's just
18 return to why that exists here in our program.

19 That's to promote market entry, and to
20 get people up and running. You could be a
21 bagillionaire, and only sell \$5,000 worth of
22 organic, and still receive the exemption. It's

1 not a disadvantaged help out program, per se, and
2 that's how it kind of gets framed as being used,
3 and how it should get used internationally.

4 It's -- you know, this is agriculture
5 marketing service, and this really promotes the
6 marketing. So I am concerned about that number
7 getting used as sort of the, you're no longer
8 disadvantaged now, and you shouldn't get to be
9 part of a group number.

10 MEMBER GIACOMINI: I don't see that number
11 as a disadvantaged number; I see it as a number of
12 a level of participation. And if, at that level
13 of participation, which is not even adjusted for
14 inflation, it doesn't matter how much money the
15 guy has anywhere else, but if that's his
16 participation in the organic industry, according
17 to the regulation, if he's in this country, he has
18 to pay for an annual inspection. It doesn't
19 matter if the annual inspection is a burden for
20 him or not, but he has to pay for it. Whereas, a
21 grower group in some other part of the world, each
22 guy doesn't have to pay it, regardless of how big

1 they might be individually.

2 CHAIRMAN DELGADO: Please wait to be
3 recognized. We have Jennifer, followed by Joe.
4 You yielded to -- okay, Joe.

5 MEMBER SMILLIE: Just to follow-up on
6 that, there's two -- the direction that the
7 committee is going is clear. We're very much
8 hoping that OTA and/or others will convene, you
9 know, a working group for retailers to discuss --
10 to flesh out more of the supposed, you know,
11 probable differences between the approaches.

12 And the word retailers has come to the
13 fore because it seems to us, at this point in
14 time, that they're the only other sector group
15 that could fit the rigorous criteria that we've
16 set down. Katrina mentioned, you know, that her
17 system is for their processing facilities, and
18 that's true. Processing facilities, everywhere
19 between the producer and the retailer, have
20 internal control systems quality, but there's also
21 other criteria that I believe would eliminate them
22 from consideration.

1 You know, the single OSP, that's -- and
2 other factors that, if you go down through the
3 criteria, I think, and I want to be pointed out if
4 I'm incorrect, that everybody in between a
5 retailer and a producer, just, I do not believe,
6 with what we've set out, they could fit at all.
7 The single OSP is a very sharp razor that will
8 slice them out.

9 It just so happens, through whatever it
10 is that's in intelligent design, that retailers
11 and producers seem to be the ones that can fit
12 these criteria. Our next task, as a committee, is
13 to continue our work with this document, and to
14 start to explore the retailers section with the
15 help of OTA and/or others, individuals and groups,
16 that will contribute to the discussion, and to see
17 whether, indeed, the community will accept the
18 proposition that - and I'll limit it to retailers
19 in my discussion - will accept the proposition
20 that retailers can function under a multi-site
21 document or not. That will be our next step.
22 That's where we'll go, and hopefully, we'll come

1 back with more information and erudition in
2 November, not necessarily with a recommendation.

3 CHAIRMAN DELGADO: I like that
4 clarification. Jennifer?

5 MEMBER HALL: There's been some
6 discussion about scale neutral, and sector
7 neutral, and I look at this a little bit
8 differently. I don't question the merit of an
9 internal control system, one that's good, and has
10 a good background to it, and execution to it.
11 However, I do see the rule, as published, as the
12 bar that we aspire to, and that being independent
13 operations, getting annual inspections, and I see
14 it more analogous to when we allow a material with
15 an annotation.

16 It's solving a specific problem with a
17 specific solution, and so I see the application of
18 grower groups as doing a similar thing, that, due
19 to real issues with supply of certain products,
20 that this is -- the grower groups is a potential
21 solution to that specific problem. So that's
22 where the scope of applying it -- otherwise, I

1 have challenges with that.

2 CHAIRMAN DELGADO: Any other
3 comments? Any other comments from the chair,
4 chairman of the -- thank you. We conclude
5 that section. I appreciate that, and I
6 encourage the chairman of the committee, and
7 the members of the committee, to take the
8 public input from the -- input from the Board,
9 and incorporate that into the next step of
10 your process.

11 Right, we are due for a break, and
12 at the same time, we're running late, so let's
13 break for five minutes. I know that's brief,
14 but I want to get us back on schedule. So
15 we'll see you here in five minutes.

16 (Whereupon, the above-entitled
17 matter went off the record at 10:02 a.m. and
18 resumed at 10:11 a.m.)

19 CHAIRMAN DELGADO: Board members,
20 please take your places. Calling Board
21 members, take your places, please. We will
22 resume our meeting right now and it is the

1 turn of the Joint Crops and Compliance
2 Committee to come and discuss their document
3 on Commercial Availability of Seeds.

4 MEMBER KARREMAN: Rigo, I'm going
5 to cede that to Gerry, that discussion, I
6 mean, but he's not here right now. Okay.

7 CHAIRMAN DELGADO: Mr. Davis? All
8 right, we have both committee chairs for the
9 CACC and the Crops Committee. I'm assuming
10 Mr. Davis will start with a presentation on
11 the Commercial Availability Guidance for
12 Seeds. Mr. Smillie.

13 MEMBER SMILLIE: Yes, I little
14 history. It's a joint committee
15 recommendation and that's because the
16 Certification, Accreditation and Compliance
17 Committee submitted a recommendation on
18 commercial availability that included both
19 seed and 606 items. The public feedback was
20 clear and precise. They wanted us to
21 bifurcate that recommendation, that's a fancy
22 word. They wanted us to split that

1 recommendation and have separate
2 recommendations. So listening to the public
3 as we do, we said, yes, that's a reasonable
4 request, so the CAC committee basically put
5 forward and passed their recommendation on
6 commercial availability and then passed the
7 work that we had done up to that point on
8 seeds to Gerry and the Crops Committee.

9 So, in a certain sense, Mr. Chair,
10 we have -- our committee sort of done our work
11 on it and passed it down to the Crops
12 Committee and they were going to take their
13 expertise in the agricultural realm and craft
14 the recommendation for commercial availability
15 on seeds.

16 CHAIRMAN DELGADO: Mr. Davis.

17 MEMBER DAVIS: Thank you, Mr.
18 Chair. This is a complicated issue as we all
19 know and I wanted to start the discussion by
20 pointing out one of the -- a part of the
21 discussion that was in the written
22 recommendation. The Crops Committee and I,

1 myself in particular, don't feel that leaving
2 this situation as it stands right now in
3 status quo in many -- in several sectors of
4 the seed availability issue, leaving it as it
5 is will perpetuate the current situation which
6 is that in certain sectors, like vegetable
7 seed, there is little movement in the
8 direction of increased supply of more organic
9 seed.

10 And a lot of that in hearing from
11 the organic seed industry at previous
12 meetings, last fall and previous, was that
13 this is because growers aren't telling their
14 seed suppliers that, "I've got to have organic
15 seed". They're just relying on the loophole
16 and shuffling some papers to make it happen.

17 I acknowledge the many comments
18 from several certifiers that say they see
19 really good movement in increased organic seed
20 availability for their growers that they're
21 certifying. No doubt there probably is a lot
22 of movement in the right direction with

1 agronomic crops such as soybeans, corn, the
2 larger field crop type things that are more
3 clear-cut and maybe less specialized on the
4 requirements of what seed is required. But
5 being a California grower and working in that
6 realm with vegetables, the farm I work for, we
7 do 30 different vegetables. It's probably up
8 to more by now, and all kinds of different
9 varieties within each individual vegetable.

10 The seed industry has -- I believe,
11 has to have a clear call to want to produce
12 more seed and if the loophole is in place,
13 it's a big obstacle, and that's my opinion.
14 The committee wanted to highlight that the
15 further development of the organic seed
16 industry is the key to increasing the
17 commercial availability.

18 The goal is to promote the
19 continued growth and improvement in organic
20 seed production and subsequent usage by
21 organic growers without hurting or putting
22 undo burdens on those growers. Achieving the

1 goal of the healthy, viable organic seed
2 industry is important, not just so we can
3 comply with the regulation but it's important
4 when considering that the pathway of the
5 conventional seed industry is more and more
6 geared towards genetically modified
7 biotechnology, you know, developments that
8 will continue to develop and progress and
9 evolve to a much different type of seed
10 program and breeding emphasis than organic
11 growers need or will need for the long term.
12 We would not -- the organically grown movement
13 will not benefit from allowing the organic
14 seed production industry to stagnate in the
15 current situation in some sectors, vegetable
16 seed, for example, to allow them to stagnate
17 while the conventional seed production sector
18 moves on to the likely future situation in
19 which traditionally bred and produced seed is
20 only an after-thought, sort of relic of bygone
21 days, that they don't put much emphasis on and
22 eventually, it could -- unforeseen things

1 could happen where we really jeopardize the
2 organic movement seed supply.

3 A vibrant organic seed industry
4 would be expected to be the best guardian of
5 proven traditional seed varieties and methods
6 as well as the likely source of new
7 innovations in organic growing methods that
8 will result in excellent quality seed, in
9 sufficient quantities to supply the market
10 need at reasonable cost. I understand in many
11 ways that's not the case right now but I think
12 as an advisory board, the NOSB should take the
13 pulpit in some ways to nudge, help nudge the
14 situation in a positive direction. And our
15 approach that we took for this further
16 guidance was to heavily suggest that giving
17 the organic seed industry market information
18 that they need to develop and help make it
19 happen is a key step.

20 Some of the comments that were
21 received that I think are especially relevant
22 to the situation. Another key factor is

1 making an even playing field for certifiers to
2 be making sure that they review growers'
3 commercial availability searches for seeds the
4 same way, that we don't have a situation where
5 many of you certifier representatives who have
6 stepped up and say, "Well, we see improvement.
7 We're pushing our growers to improve on more
8 and more organic seed", but there may be other
9 agencies, certifying agencies that don't take
10 that tact at all and they're just shuffling a
11 little bit of paper and saying, "Okay, you
12 satisfied the requirement of proving that you
13 couldn't get organic seed".

14 So but I think we -- how do I say
15 this -- for the program I don't know if
16 implementing enough ACA training consistently
17 enough would really realistically change that
18 situation where you have some certifiers
19 actively involved in encouraging their growers
20 to use more organic seeds and you have others
21 who see no real enforcement issues, no problem
22 off of their -- you know, coming from the

1 program as far as accreditation problems for
2 their certifying agency. So they -- the
3 squeaky wheel doesn't get any -- the non-
4 squeaky wheel doesn't get any grease if they
5 don't think it's a big issue that's being
6 thrown at them from the program, that they
7 need to make sure growers are showing an
8 improvement in how much seed they're accessing
9 if they're not already doing that.

10 Some of the -- I think this is kind
11 of a work in progress. Some of the
12 problematic points that I wanted to make sure
13 that I'm hearing correctly from members of the
14 industry who have provided written or oral
15 comments. One was that in the document, we
16 mentioned that there needs to be written
17 responses from seed suppliers to the producers
18 in response to their list that they supplied
19 to them and that more than one said that
20 getting written responses from seed suppliers
21 is not really dependable.

22 The grower can't count on that

1 supplier answering. You know, a small grower
2 can use the catalog itself to show the
3 response but there may be growers who don't
4 order from catalogs but also don't get a
5 response from their seed supplier showing that
6 certain varieties weren't available
7 organically.

8 I take note of the comments also on
9 growers' concern that their confidentiality of
10 the varieties that they want to use, if they
11 feel their confidential and they don't want to
12 make that public knowledge, that they have
13 that right to not have it made public
14 knowledge.

15 Another good point, I thought, was
16 several of the certifiers saying that --
17 asking for all this grower and certifier
18 commitment of effort to gather these lists for
19 the grower to first make the list and put it
20 down in a form that is readable to someone
21 else and the supplying it to the certifier.
22 The certifier passing it onto whoever it's

1 going to go to, to commit to that effort
2 before a tabulation and publication vehicle
3 even exists is probably asking for too much
4 and I hear that comment.

5 Another good point was the need for
6 standardized list format, if we're going to go
7 there. We're requiring growers to do a list.
8 The tabulation of the data base of the organic
9 seed need would really be stumbled by not
10 having a standardized list format. And also
11 how do we create a uniform database,
12 harmonized database. I want to turn that back
13 to Joe Smillie to comment on that.

14 MEMBER SMILLIE: Yes, that's one of
15 the things that's come up and our
16 recommendation was criticized for being rather
17 fuzzy, throwing it out there to some
18 organization as unspecified. And I think we
19 need to do some work on that. To me, I would
20 like to see the NOP take some leadership on
21 that one and come up with a solution as how
22 they'd like to see that database created.

1 That doesn't mean the NOP has to run the
2 database but I think that the NOP in concert
3 with some of the organizations that have
4 already stepped forward, either one or a
5 combination of OMRI, ASA and OSGATA or
6 whatever it is, Woody, OSGATA.

7 I mean, we've got the expertise in
8 the community to put that together and I think
9 that that's what we want to encourage. And I
10 would just point out not being derogatory of
11 the US's efforts but the Eu has this
12 organized. It's not perfect in the UE and I
13 think we can learn from what they've done and
14 learn some of the mistakes they've made in
15 doing this, because there have been some flaws
16 in the EU regulation, but in the EU each
17 member state has that database and it's a
18 fairly active one and our colleagues, our USDA
19 accredited certification colleagues in Europe,
20 don't have such the problem that we do. So I
21 think that through some combination which the
22 NOSB encourages, but doesn't necessarily want

1 to format, we would encourage the NOP to take
2 a leadership role in working with some of our
3 organizations to create a harmonized, unified,
4 you know, seed -- organic seed availability
5 and demand database, because what was pointed
6 out yesterday is the information has to flow
7 both ways.

8 It's not just good enough to say,
9 "That's what's in Johnny's catalog". I mean,
10 Johnny might want to know, you know, what they
11 should be -- where they should be heading
12 also. So I think that that's one of the key
13 factors that we want to promote. I'm not sure
14 what role the NOSB will play in that but
15 that's one of the things that we want to bring
16 to the NOP's attention.

17 CHAIRMAN DELGADO: Jeff.

18 VICE-CHAIR MOYER: Thanks, Gerry
19 and Joe. I think you did a great job of
20 pulling that together. Having sat on that
21 committee, I know there was a lot of
22 discussion and it was difficult discussion on

1 how we're going to spread the burden around
2 because I think clearly we all agreed that we
3 wanted to give greater movement and faster
4 movement in the acceptance of using organic
5 seed and as a farmer, you know, the idea of
6 the burden that we were talking about placing
7 on farmers to collect those lists came up and
8 was discussed. But I know from talking to
9 other farmers that clearly they don't believe
10 that they really need to use organic seed and
11 we have to change that perspective. So we
12 needed to come up with some sort of a tool
13 that would allow us to do that. We also, in
14 terms of spreading the burden around, you
15 know, we were trying to put some of the burden
16 on the program both in terms of sort of giving
17 the input to the certifiers that this is an
18 important issue. We heard yesterday that many
19 of the certifiers felt like it's not part of
20 the audit trail. It's not part of what's
21 really discussed at training overly, and so
22 there's not a lot of great importance put on

1 that and so they don't see it pushing that
2 onto the farmers.

3 So I think that, you know, we put
4 some of the burden on the program for that and
5 as you heard, Joe suggests, you know, we're
6 asking the program to take up the challenge
7 and figure out some way of directing the
8 management of that list, whether you manage it
9 yourself or have somebody else do that, we try
10 to do that.

11 We also put some of the burden on
12 the certifiers by saying, "You need to make an
13 impact, an impression on your farmers so that
14 -- on your producers so that they are giving
15 you this seed list", and I think we're forcing
16 farmers to take up some of the burden by
17 creating that list.

18 I think farmers, the farmers I
19 talked to, are willing to do that if they felt
20 that their confidentiality was protected and
21 that the list actually went somewhere, meant
22 something, and did something. If it's just

1 another piece of paperwork and that they --
2 and energy that they have to expend to send a
3 list out into the black hole of data that they
4 never get a response from or have access to
5 use for, then I think it becomes a sad point
6 for them.

7 And by the same token, we're trying
8 to put some of the burden onto the seed
9 suppliers, forcing them to connect with that
10 list and with the farmers so that you know,
11 while I don't agree with everything in this
12 recommendation, it seemed to be the best tool
13 that we could come up with, with spreading the
14 burden uniformly across everybody and getting
15 off the dime and moving forward.

16 CHAIRMAN DELGADO: Any other
17 questions? Kevin?

18 MEMBER ENGELBERT: Yes, I'd like to
19 second that also and make people aware that we
20 just simply deny that there is still a
21 problem. It's disappointing that the seed
22 growth hasn't increased like it should,

1 organic seed usage, and it's a tremendous
2 investment for these seed growers to develop
3 and grow this seed and unlike conventional
4 growers that can simply take leftover seed,
5 retreat it, put it up for sale again next
6 year, organic seed can't be treated and a lot
7 of it goes bad.

8 So we just thought, we have to do
9 something to move this industry forward. And
10 like Jeff said, spread the burden around and
11 get this moving. And again, farmers that use
12 organic seed aren't going to be faced with any
13 additional paperwork, any additional problems.
14 It's only those that are trying to get around
15 this regulation or these -- the intent of
16 these rules that will have to really do more
17 work to prove that they actually cannot get
18 certified organic seed.

19 CHAIRMAN DELGADO: Jennifer.

20 MEMBER HALL: I kind of want to
21 restate a little bit of what I said yesterday
22 and I would -- my preference would be not to

1 institute more paperwork to solve the issue,
2 that there were some comments, I think from
3 Pat yesterday saying that certifiers should
4 not be in the position of being a promoter or
5 a marketer of organic seed and I fully agree
6 with that. However, I do think they are there
7 to enforce the regulations, and that as a
8 certifier, they do need to make sure that the
9 grower is following the letter of the law and
10 it's clearly stipulated that every effort
11 needs to be made to find organic seed.

12 So I do think that the burden of
13 proof is on the grower to do that and that it
14 would only take a couple of times for the
15 certifier to say, "You're not doing this and
16 there is organic seed available and I'm sorry
17 that it's in the ground already," but it's
18 quite readily available and that certain item
19 can't be sold as organic this year, which does
20 not disband your entire production, but that
21 it would just take one or two instances of
22 that to overcome what's concerning to me that

1 growers don't -- I mean, in your words
2 necessarily, see it as their number one
3 concern, that it's something that they need to
4 be really aware of and making sure they're
5 doing their due diligence about.

6 And that, for me, it's tied
7 together then with enforcement, that there are
8 certainly a host of other things that this
9 rule stipulates that are never questioned as
10 important and they are very strongly enforced.

11 CHAIRMAN DELGADO: Yes, Tina.

12 MEMBER MIEDEMA: I have to say I
13 had a lot of reservations about this
14 recommendation but it was the three people on
15 the committee who would actually be effected
16 by this recommendation, that we're very much
17 for it and thought that they could -- that the
18 investment of their time would be worth the
19 result that tipped my hand toward voting for
20 it on the committee.

21 CHAIRMAN DELGADO: Julie.

22 MEMBER WEISMAN: Yes. Not being a

1 farmer or on the Crops Committee, I am struck
2 by the similarity between the struggles around
3 this issue and some of the questions that we
4 keep wrestling with and hearing about in the
5 handling community on issues around 606. And
6 it sounds to me like -- I guess I'm asking
7 this as a question to the rest of my fellow
8 board member; I hear two separate issues. One
9 is the question of seed that's available and
10 how to require people to use what's available.

11 But the second one is that in many
12 cases there is nothing available and there's
13 this question which is also critical in 606,
14 how does the supplier community become
15 incentivized to supply these items? And I
16 guess one thing that I'm not clear about is
17 like what percentage of crops are currently
18 being grown from organic seed right now, like
19 what is -- what percentage is available is
20 organic? Like, how far -- what additional has
21 to be created that's not there right now?

22 CHAIRMAN DELGADO: That's a fair

1 question. Gerry.

2 MEMBER DAVIS: I'll respond to it.

3 I would base it on comments received yesterday
4 from the public on the amount that it is, you
5 know, various certifiers said, "We see good
6 progress in corn, soy beans, so on and so
7 forth", whereas there's a fairly high
8 percentage of those growers that grow those
9 crops using organic seed.

10 A comment from CCUF from California
11 that deals with a lot of vegetable growers
12 that they're thinking it's probably only two
13 or three percent of that market is organic
14 seed, and they see it, it's doubled, I think
15 the comment was over the last couple years,
16 but it's gone from one or two percent to two
17 or three and I know speaking for our farm, we
18 access -- we already do something like this
19 where we submit a list to our seed suppliers,
20 and being a large farm, we get a response and
21 they say what they can find for us organically
22 and many of the varieties we use are organic

1 but a lot of the hybrid varieties is a big
2 problem.

3 There's kind of a bit of a gridlock
4 in vegetable seed hybrids on being organically
5 produced, that of sufficient quality and
6 quantity.

7 MEMBER DAVIS: Was that clear?

8 MEMBER WEISMAN: Yes, thank you.

9 CHAIRMAN DELGADO: Any other
10 questions? Okay. Well, thank you very much,
11 both of you. Then we can move onto the next
12 topic which is again, the Crops Committee.
13 Before that, I want to remind the public, if
14 you have signed up for public comment today or
15 tomorrow please go back and make sure that
16 your signature appears on those sign-up
17 sheets. And if your kind enough -- just the
18 registration, I stand corrected.

19 Go back, make sure that your
20 signature appears in the registration, is that
21 correct? Okay.

22 SECRETARY HEINZE: For each day

1 that you're here. We need a count of every
2 day we have to report who is here.

3 CHAIRMAN DELGADO: Thank you for
4 that clarification. Okay, back to Mr. Davis
5 to talk about Crops Committee.

6 MEMBER DAVIS: Okay, for out
7 petition materials for this meeting, we have
8 three, tetracycline, cheesewax and Dextrin and
9 I'd like to start with tetracycline. The
10 petition is for adding tetracycline which is
11 specifically oxytetracycline hydrochloride as
12 plant disease control for all diseases on the
13 crops registered by the US EPA on the National
14 List, adding it to 601, Item I-10 and with a
15 note we put in which would effectively remove
16 the current annotation if we were to do so, I
17 believe, but that is probably up to
18 discussion, but the committee voted six no,
19 zero yes, one absent to reject that petition
20 based on we felt that particularly with
21 reference to adding all crops which
22 effectively would add peaches and nectarines

1 to the crop list that could use these
2 materials. In reference to that we felt it
3 was not necessary. The reason tetracycline is
4 on the list for apples and pears even though
5 it's very contentious material, many, many
6 people in the industry and consumers probably
7 alike, shudder at the thought of antibiotics
8 being sprayed on organic crops. So there's a
9 lot of problems with -- a lot of resistance to
10 the use of materials like this in organic.

11 So for that reason, we did not feel
12 that for peaches and nectarines it was so
13 needed that it could overcome the basic
14 incompatibility and consistency with the
15 rule. Apples and pears, the reason they're on
16 there, as I started to say was that the damage
17 from fire blight in pears specifically, is so
18 devastating that entire orchards can be lost
19 and the previous board that looked at this
20 material last in Sunset a couple years ago,
21 had a split decision, it was a very close vote
22 and allowed it to stay on the list mainly

1 because of the dire need that pear growers
2 particularly have for the material. Otherwise
3 it would not have been relisted in my opinion
4 because I was there.

5 This material, we rejected it
6 basically because we did not want to add it to
7 more crops. The petitioner is here and made
8 comments yesterday that they would be willing
9 to represent the material for just apples and
10 pears and to change their petition. In trying
11 to analyze this on the fly here at the
12 meeting, I'm not exactly sure of the proper
13 policy and the way it should be, but the best
14 I can tell, probably if that is the
15 petitioner's wish, they should come forward
16 and state that for public record what their
17 intent now is and we can decide what to do
18 with the material.

19 CHAIRMAN DELGADO: Would the
20 petitioner of tetracycline come up to the
21 forum and state their intention for the
22 petition, please? And if you can state your

1 name and your rank and file.

2 MR. RICHARDSON: Yes, Taw

3 Richardson, President of AgriSource.

4 CHAIRMAN DELGADO: Can you get
5 closer to the microphone, so our recorder can
6 -- and if you would, spell your name, please.

7 MR. RICHARDSON: T-a-w, Taw
8 Richardson, and yes, as stated, we are willing
9 to withdraw the portion of our petition that
10 deals with peaches and nectarines and limit it
11 to pears and apples to facilitate a decision
12 on the part of the Board related to the
13 component.

14 CHAIRMAN DELGADO: Thank you. Any
15 questions for the presenter? Mr. Davis?

16 MEMBER DAVIS: I have no further
17 questions for Mr. Richardson.

18 CHAIRMAN DELGADO: Thank you very
19 much.

20 MR. RICHARDSON: Thank you.

21 MEMBER DAVIS: I believe the proper
22 thing to do would for the Crops Committee to

1 convene at this meeting, perhaps this evening
2 and this afternoon, and discuss this
3 development and decide whether we proceed with
4 a vote on the recommendation as it stands or
5 possibly defer it for the fall meeting.

6 CHAIRMAN DELGADO: Very good.
7 Questions no that specific topic? We have
8 Tina first followed by Jeff.

9 MEMBER ELLOR: Well, while the
10 whole group is here, our options are probably
11 several. We could send it back for TAP
12 because it is a different chemical, correct,
13 or not a TAP, a Technical Review.

14 CHAIRMAN DELGADO: Technical
15 review.

16 MEMBER ELLOR: Or is it possible to
17 add it to the current listing rather than make
18 a separate listing, either of those two
19 possibilities.

20 CHAIRMAN DELGADO: Gerry, can you
21 clarify that? What is the intent of --

22 MEMBER DAVIS: You're absolutely

1 correct. There have been statements made that
2 even though the EPA considers and regulates
3 tetracyclines, you know, the current one
4 that's on the list is Oxytetracycline calcium.
5 This one is Oxytetracycline hydrochloride.
6 The EPA considers them as the same and the
7 petitioner in written public comment went at
8 great length to explain all of that. But
9 there have been several comments saying that
10 this should have a technical review done in it
11 because it is a different material. I don't
12 have a comment on what's the right thing
13 there. It's beyond my expertise to say what
14 is right.

15 CHAIRMAN DELGADO: Very good, so
16 again, you will take that back to your
17 committee and make a decision by tomorrow.

18 MEMBER DAVIS: Right.

19 CHAIRMAN DELGADO: Jeff?

20 VICE-CHAIR MOYER: Yes, the other
21 question that the committee had really needs
22 to probably addressed by the program which was

1 if we do reconsider this material, obviously,
2 we are going to do that, and put it on the
3 list, given the fact that at the last Sunset
4 process tetracycline barely passed by I
5 believe it was a six to five vote if my memory
6 serves me correctly. Would this necessitate
7 or put this on the list for a five-year period
8 at Sunset or would it simply be an addition of
9 the new chemical compound name on this
10 existing list in which case it would Sunset in
11 only two and a half years along with the
12 existing tetracycline?

13 CHAIRMAN DELGADO: That is a
14 question for --

15 VICE-CHAIR MOYER: Does that make
16 a difference in how the Board views this
17 material? It would be nice to get a comment
18 on that.

19 CHAIRMAN DELGADO: Can we have a
20 comment from members of the program, please?

21 MR. POOLER: This is Bob Pooler,
22 NOP. This essentially is a new material.

1 It's different from the calcium complex that's
2 currently on the list, so it would have to be
3 a separate material at this point.

4 CHAIRMAN DELGADO: So it is a
5 separate material and the count will start
6 again, correct, five years? Thank you for
7 that. It does not effect the old one, that's
8 correct. Next is Katrina. She passes and we
9 have Dan.

10 MEMBER GIACOMINI: Gerry, for those
11 of us that are not crops folks, on the list
12 currently, could you give -- just clarify the
13 way these two annotations are listed. We have
14 streptomycin for fireblight control in apples
15 and pears only and then we have tetracycline
16 Oxy-Tech, calcium for fireblight control only.
17 If we're putting the tetracycline, the new
18 tetracycline in the -- sort of under the
19 category of the existing Tet, what's the
20 difference in those two annotations?

21 MEMBER DAVIS: They sound different
22 but effectively, they aren't different because

1 fireblight only exists on apples and pears.

2 CHAIRMAN DELGADO: Right, any other
3 questions?

4 MEMBER KARREMAN: I would think --
5 you were talking about the options you can
6 take today, either having a committee meeting
7 at some point, and I'm not on your committee,
8 I realize that, but -- and maybe changing the
9 annotation to what the petitioner wants, or
10 deferring it. I would suggest we vote on it,
11 vote on the material at this meeting and not
12 defer it.

13 I don't think a TAP needs to be
14 done. If the other Oxytetracycline is already
15 on the list, functionally it's the same. And
16 you know, I'd say we should vote on it, at
17 this meeting.

18 CHAIRMAN DELGADO: Any other
19 comments? Jeff?

20 VICE-CHAIR MOYER: Although that
21 being said, Hu, we just heard from the program
22 that it is a different material and is going

1 to be viewed within the program as a different
2 material and it does have a different CAS
3 number with the EPA.

4 MEMBER DAVIS: So that's an
5 interesting quandary we're placed in with
6 exactly what to do.

7 CHAIRMAN DELGADO: Again, that's a
8 question for the committee to resolve. Any
9 other questions from the Board? Okay.

10 MEMBER DAVIS: Moving onto the next
11 material, Cheesewax, in response to some of
12 the public comment received yesterday,
13 specifically referring to some of the -- on
14 the recommendation form, the responses, the
15 documentation responses, the committee
16 acknowledges that some of the comments made
17 perhaps, should have been deleted and we are
18 going to also convene on this and remove some
19 items.

20 But I jumped ahead a little bit,
21 excuse me. The petition is for inclusion of
22 micro-crystalline Cheesewax and the CAS

1 numbers mentioned are three CAS numbers
2 because it's three different wax-type
3 materials, paraffin, a couple other things,
4 that account for those CAS numbers. And it's
5 added to the National List as a production aid
6 in log grown mushroom culture and with the
7 stipulation made without either ethylene,
8 propylene, co-polymer or synthetic colors.

9 We voted as a committee to put this
10 material on the list. It's very small usage
11 but effects dramatically a small segment of
12 the organic producer community. They are
13 asking for help on this because they are stuck
14 because they don't feel they have another
15 option. Some of the comments that we made in
16 the documentation section referring to
17 petroleum or crude oil that the petition
18 itself had some opinions about crude oil and
19 petroleum as semi or natural material and we
20 did not intend to construe that we agree with
21 that petitioner's position on that by our
22 responses in the documentation section.

1 So we will work on removing some of
2 those specific things that don't change our
3 answers specifically. They're just part of
4 the documentation and the backup. So we will
5 expunge those and show them at the meeting
6 tomorrow before the vote.

7 The next material is -- oh,
8 discussion, I'm sorry.

9 CHAIRMAN DELGADO: Yes, are there
10 any questions from the Board? We have Tina
11 followed by Steve, yes.

12 MEMBER ELLOR: I'd just like to
13 say, I've looked at this petition
14 exhaustively. I am in the mushroom industry.
15 I work for a mushroom farm. We don't use this
16 material. We don't grow mushrooms this way.
17 This is used by a very small, very small
18 growers, very small segment of the industry
19 and they did a huge amount of work on this
20 petition, and I have to say there was no
21 obfuscation, however you pronounce that, on
22 this petition. It was very straightforward.

1 They provided a tremendous amount of
2 information. It just turned out to be a lot
3 more complicated than I ever could have
4 anticipated from such a simple-sounding
5 substance. So I think with going through it
6 thoroughly, looking thoroughly at all the CAS
7 numbers that, you know, I feel pretty good
8 that -- and I went out and talked to some of
9 these small producers and mostly on their own,
10 they don't use colored Cheesewax, but it would
11 be good to eliminate that possibility.

12 CHAIRMAN DELGADO: Okay, Steve.

13 MEMBER DeMURI: Tina just answered
14 my question. I was going to ask her
15 specifically as a mushroom producer, for her
16 opinion on this material and she just gave it,
17 so --

18 CHAIRMAN DELGADO: Thank you.
19 Katrina?

20 SECRETARY HEINZE: I can't find it
21 exactly right now, but there was one written
22 public comment that gave a lot of detail on

1 this material and had questions about whether
2 the CAS numbers were accurate. I was
3 wondering, could you speak to the public
4 comment? I'm rifling through my binder. If
5 I find it, I'll be more helpful.

6 MEMBER ELLOR: Yes, I went through
7 the petition and there was, I don't know, 180
8 pages of it or something, and picked out every
9 CAS number I could find and looked it up, so
10 that's how we got the information that we
11 have. If I missed a CAS number, then, you
12 know, certainly I'd like to know that, but we
13 listed specifically only three CAS numbers
14 that we're going to allow on here and as far
15 as I know, I took those out of the petition.
16 I looked them up and if we made a mistake
17 there, then you know, whoever made that
18 comment maybe could come and see us.

19 CHAIRMAN DELGADO: Any other
20 questions? Okay, thank you. We can proceed
21 to the next one.

22 MEMBER DAVIS: Thank you. The next

1 material is for Dextrin petitioned to be used
2 as a binder in seed coatings with placement on
3 the National List 205601N as seed
4 preparations. One change that I think the
5 committee will agree to, we may have to vote
6 on it, but it's a small one. In Section B
7 there for substance fails criteria category,
8 the sentence, "Non-synthetic starches", I
9 wanted to changed that to "Binders".

10 And there was one other place in
11 the documentation in further pages that says
12 the same sentence essentially. What seed
13 coating companies use for their binders and
14 their materials in their process, I've learned
15 from talking to several of them, are quite
16 secret and they really won't give you
17 specifics of what they are very much. So for
18 us to say they're starches, I can't say I know
19 that for sure. So we'll use a more generic
20 term of binders.

21 We voted as a committee four no,
22 zero yes to reject this petition in that we

1 felt that it failed criteria category 2 and 3,
2 that it wasn't essential for producing
3 organically approved seed coatings and that it
4 -- for Category 3, it was not compatible with
5 and consistent with organic regulations in
6 that adding synthetics to the list when there
7 is available options is not compatible with
8 the rule.

9 And one -- there are currently a
10 couple examples of organically approved seed
11 coatings from two different companies that are
12 on the market and although they were not
13 willing to state what they are using, the --
14 and because of certifier confidentiality, the
15 certifier that certifies that as organic can't
16 tell us that either, but we are sure that they
17 are all using organically approved materials.

18 So, the committee voted to reject
19 this because there are other seed coatings
20 using organically approved binders, not
21 Dextrin. Any questions?

22 CHAIRMAN DELGADO: Questions from

1 the Board? Dan.

2 MEMBER GIACOMINI: In your notes on
3 the material, you referred to hydrochloric
4 acid as a source of a ph change or stabilizer.
5 They refer to food acids. I'm not sure that -
6 - or food approved, I forget their exact
7 terminology. Can you address the issue of
8 whether this is going in as a ph stabilizer or
9 is it initiating a chemical change?

10 MEMBER DAVIS: From reading the
11 petition and which I believe the petition does
12 not say hydrochloric acid, I believe that was
13 from an internet search that I did, but
14 regardless of the acid, the acid itself is not
15 a problem. It's the statement that the
16 petition made that the acid is sprayed on the
17 natural starch and a polymerization process is
18 initiated by that acid treatment. So it's not
19 a ph adjuster. It is actually the material
20 that stimulates a chemical change.

21 And I guess we could receive
22 comment if that is incorrect but I don't think

1 that's been put forth.

2 CHAIRMAN DELGADO: Okay, any other
3 questions? Very good, thank you and I
4 appreciate the work of all the members of the
5 committee. I know you went out of your way to
6 contact suppliers and talk to producers and
7 did a thorough investigation. Right, moving
8 on and also including Gerry, we have Dr.
9 Karreman with Joint Crops and Livestock
10 Committee.

11 Sunset material, I'm sorry, I was
12 getting over-excited, thinking that we were
13 ahead of the schedule. So my apologies. Back
14 to you, Gerry.

15 MEMBER DAVIS: I was wondering what
16 you were doing.

17 CHAIRMAN DELGADO: Yes, I tell you
18 I have no excuse this time.

19 MEMBER DAVIS: For the Sunset
20 material questions, there was additional
21 public comment received after the November
22 meeting vote on these materials, so we needed

1 as a committee to reaffirm that we had looked
2 at those public comments and that they did not
3 effect in any way the outcome of our vote. So
4 we -- that's what this item is about.

5 Just to say that in response to the
6 additional comments received after the
7 November 2007 NOSB meeting and vote, the
8 committee reaffirms its recommendation of
9 November 2007 for the relisting of the
10 following substances in these use categories
11 as published in the final rule; copper
12 sulfate, ozone gas, parasitic acid. EPA lists
13 three inerts for use in passive pheromone
14 dispensers and calcium chloride. Any
15 questions?

16 CHAIRMAN DELGADO: Questions from
17 the Board? Okay. None. Very good. We'll
18 proceed.

19 MEMBER DAVIS: Onto the next item,
20 we have a discussion document. The
21 hydroponics issue has been on the Crops
22 Committee work plan since I believe 2001 and

1 probably because of the complexity and -- of
2 the issue and it's not common knowledge with
3 a lot of people. It's kind of sat there with
4 some work being done on it, so we felt that we
5 should begin the discussion again and move
6 towards an eventual recommendation.

7 We -- the main -- and there were a
8 lot of public comments received regarding this
9 document. And I thought I should address
10 those quickly, first of all. We -- it is not
11 the committee's intent to certify as organic
12 liquid-based hydroponic growth culture of
13 terrestrial plants. So almost all the
14 comments were addressing that topic that no,
15 you can't go there, you can't go there, and we
16 just wanted to say that through out discussion
17 of it, that is not our intent to go to
18 suggesting certifying terrestrial plants grown
19 in truly liquid culture.

20 So the intent of this discussion
21 item was to reopen the issue and get public
22 comment from the industry on -- so we can

1 proceed forward with the proper determinations
2 on should liquid-based, you know, terrestrial
3 plant culture be allowed. I've already
4 addressed that. What systems can be allowed,
5 soilless systems, kind of dispensing with the
6 hydroponic term because it's -- I think the
7 committee feels that it's truly specific to
8 liquid culture of terrestrial plants.

9 So what other soilless growing
10 systems are possible? What can be certified
11 as organic? I wanted to receive comment on
12 that. In the hydroponic issue, there will
13 need to be guidelines around such things as
14 growing spiraling, you know, plants that are
15 normally aquatic plants, other higher plants
16 that are naturally water -- naturally aquatic
17 species, things like that.

18 So really the whole intent of this
19 was to stir the pot a little bit and it speaks
20 for itself and just to get the issue opened
21 back up again and start moving in a direction
22 of some guidelines. The Europeans already

1 have guidelines on this subject. The
2 Canadians are moving towards -- they already
3 have some greenhouse guidelines that touch
4 upon these topics and I'm told that they are
5 moving towards adoption of standards in the
6 not too distant future, so we felt it was
7 timely for the US system to address the topic
8 and move towards recommendations also. Any
9 questions? Steve.

10 CHAIRMAN DELGADO: Steve.

11 MEMBER DeMURI: Do you know what
12 they're doing in Europe? Can you briefly
13 describe what the standards are there?

14 MEMBER DAVIS: I'm not sure. It
15 would take a little time to really spell it
16 out. There are some differences between what
17 the Canadians currently allow and what the
18 Europeans, and there's differences within what
19 the EU system overall says versus what
20 individual member states allow. It's a pretty
21 confusing situation. There was one public
22 comment, written comment submitted from

1 someone in the Netherlands that pointed out
2 that currently in the EU overall system that
3 it has -- the terrestrial plants have to be
4 grown in soil but I'm told from investigating
5 it, that that's not necessarily true in all
6 member states. So I don't know where you go
7 with that.

8 CHAIRMAN DELGADO: Joe?

9 MEMBER SMILLIE: I just wanted to
10 be sure. You didn't touch on sprouts at all.
11 This was not part of your consideration.

12 MEMBER DAVIS: No.

13 CHAIRMAN DELGADO: Any other
14 questions? Okay, well, thank you very much.
15 This time we can move onto to the Joint Crops
16 and Livestock Committee report on the aquatic
17 plants recommendations and Jeff, you'll be
18 participating in that.

19 VICE-CHAIR MOYER: I will, thank
20 you, Mr. Chairman. The reason that this
21 particular item was handled by a Joint
22 Committee of Crops and Livestock is that often

1 aquatic plants are grown strictly for the use
2 in -- to sell directly for human consumption.
3 The other use, of course, is for a feed source
4 for fish or fish-type creatures, so that's why
5 it was in a Joint Committee.

6 If you -- I'll direct your
7 attention to either the board, the visual
8 board, or your notebook item number 8.

9 Basically what we did was we treated aquatic
10 plants just as if they were any other crop, so
11 they fall specifically under Section
12 205.258(c) in that they have to follow all the
13 rules and regulations that any other crop
14 would have to follow with the exceptions, and
15 that's why I direct your attention to Section
16 A and eventually Section B.

17 Under Section A you'll see that we
18 are directing aquatic plants to be treated a
19 little bit different. In Section A we're
20 talking about a closed containment system.
21 This would be a pond, a pond-type system that
22 has, for the most part, a soil base. So if

1 you look at A1, you'll see that any pond with
2 soil from which aquatic plants are intended to
3 be represented as organic, must have no
4 prohibitive substances as listed in 205.201
5 for at least 36 months, again, treating it
6 just like we would a field crop because it is
7 a soil-based pond.

8 However, if the container or the
9 containment system is more like a greenhouse
10 in that it is a pool or a channel or some sort
11 of raceway, we are growing these plants, we
12 have indicated that you can have an approved
13 clean-out procedure to prevent contact or
14 contamination with prohibited materials, just
15 like you would in a greenhouse.

16 You don't have the three-year
17 transition period there because you're not
18 against the soil. Section A2 aquatic plants
19 may be provided dissolved macro nutrients and
20 micro nutrients including trace minerals and
21 vitamins listed in 205.601, just like any
22 other crop would. However, the dissolved

1 amounts shall not exceed those necessary for
2 the healthy growth of the plants and such a
3 culture medium shall be disposed of in any
4 manner that does not adversely impact the
5 environment.

6 And in Section 3, a pond or a
7 containment vessel must have a berm elevation
8 to protect any -- basically, it's a buffer
9 zone, just like you would in a field to
10 protect any run-off from the surrounding area
11 to come into the pond, and then item 4, and
12 this is an important one. We felt that often
13 times there's a pond or the pond might be
14 drained to collect the fish out of the pond.
15 You could not use that time of harvest as a
16 mechanism to dump the water into a receiving
17 waterway as a mechanism of purging the pond of
18 any collected environmental hazardous material
19 or dissolved fertilizers.

20 So if you are going to dump the
21 pond, you must -- the pond must -- the water
22 coming out of the pond must meet the standards

1 based on the total maximum daily load
2 requirement of the receiving waterway as
3 provided by the current state code. That
4 deals mainly with US based operations where
5 you would have TMDL.

6 In cases where there is no TMDL
7 metrics, if you look at Item 4(ii) you'll see
8 that we have listed there based on EPA
9 guidelines, a secondary treatment that's
10 listed as 30 milligrams per liter BOD, total
11 suspended solids where 85 percent removal of
12 the BOT is attained. Again, giving some
13 guidance to anybody who wants to grow aquatic
14 plants under this system, some idea of what
15 they can discharge into a waterway.

16 And my understanding from the EPA
17 folks is that this is sort of the lowest
18 common denominator that they accept anywhere
19 and again, we would want foreign certifiers to
20 adhere to that as well.

21 Section A5, talking about manure,
22 we're saying that in this recommendation that

1 manure from terrestrial animals may be used to
2 fertilize aquatic plants intended to feed
3 organic fish in aquaculture ponds for organic
4 production systems provided the manure is
5 composted in compliance with 205.203, which we
6 had approved at an earlier date.

7 Aquatic plants may be grown in open
8 water systems. This would be different from
9 what we had just previously talked about with
10 containment systems, in that they can be grown
11 in open water but here you would not be able
12 to use manure-based fertilizers because we
13 don't want people just randomly going out
14 there and dumping manure into open waterways
15 that would have access to non-contained
16 systems.

17 That, Mr. Chairman, is our
18 recommendation.

19 CHAIRMAN DELGADO: Okay, questions?
20 Joe?

21 MEMBER SMILLIE: Yes, I'm thinking
22 about the B part. Was consideration of other

1 examples, like in open water, like nori
2 culture for example. In 606 we're working
3 with a lot of wild harvested aquatic plants
4 but I'm presuming in the very near future
5 we're going to be looking at you know, farmed
6 aquatic plants, and I can think of nori for
7 one, perhaps clorella, you know, I think is on
8 our work plan also.

9 How does this recommendation --
10 does that interface with that type of open
11 water organic farmed aquaculture, aquatic
12 plants?

13 VICE-CHAIR MOYER: Well, I think it
14 does. I mean, our main stipulation was when
15 you are in open water system, you have very
16 little control of the movement of the water
17 and we wanted to make sure that people weren't
18 somehow dumping manure-based fertilizers into
19 this open water, because that just -- I don't
20 even think even if we approved it, it would
21 not be approved by any other agency. You just
22 cannot do that.

1 I mean, Dan brought that up in your
2 conversations during the meeting that putting
3 manure in water to begin with is a touchy
4 subject, and that's why we said it has to be
5 composted but --

6 MEMBER SMILLIE: I don't mean that
7 there's anything wrong with what you've said,
8 it's just that we're going to need a bigger
9 framework with a lot more points of, you know,
10 open water contamination, all sorts of other
11 things if we start to look at, I'll just use
12 nori as an example, nori culture which has
13 been practiced in Maine as well as Japan.
14 Those are open water -- those are farm
15 systems.

16 They hang out nets, they've got
17 specifications on the culture and how they
18 collect and harvest it. So it is farmed.
19 It's not wild harvested and there will be, I
20 think, other considerations.

21 VICE-CHAIR MOYER: Are they
22 fertilizing those systems?

1 MEMBER SMILLIE: No, as far as I
2 know, not.

3 VICE-CHAIR MOYER: We have not come
4 across any point where they were but I don't
5 know everything, obviously, on the subject.

6 MEMBER SMILLIE: But like the whole
7 background contamination issues and that sort
8 of thing. I just -- it's a big topic, farmed
9 aquatic plants and there's a number of
10 cultures that don't seem to fit into this
11 recommendation.

12 VICE-CHAIR MOYER: Well, obviously,
13 like with all of our documents, you know, this
14 guidance document is a living document.

15 MEMBER SMILLIE: Yes.

16 VICE-CHAIR MOYER: And as issues
17 come up, we would certainly be prepared as a
18 Joint Committee to introduce those items for
19 further discussion and recommendation.

20 MEMBER SMILLIE: Well, in our work
21 plan, clorella is there and that is -- that's
22 wild harvest, though, I guess. We don't know.

1 We'll find out.

2 MEMBER WEISMAN: There's two
3 algae, one is --

4 CHAIRMAN DELGADO: Wait to be
5 recognized.

6 MEMBER WEISMAN: There are two
7 algae on our work plan. One is wild
8 harvested and one is close containment and I
9 forget which is which but there is definitely
10 one that is wild harvested, so it will become
11 an issue.

12 CHAIRMAN DELGADO: Again, I will
13 ask you to be recognized first before you
14 address the Board. No problem. We'll go with
15 Dan and followed by Gerry.

16 MEMBER GIACOMINI: Thank you, Mr.
17 Chairman. In A5, you're talking about manure
18 and then qualifying it as composted. In B all
19 you're talking about is manure. I would be
20 comfortable and would it not be appropriate to
21 include both manure and composted manure in B?

22 VICE-CHAIR MOYER: It would be and

1 we have no problem adding that. We thought we
2 covered that by saying "in any form." So we
3 were saying manure, whether it's composted,
4 raw. Any way you look at it, it could not be
5 applied, but if the Board felt more
6 comfortable adding the word "compost" there,
7 I don't think the Joint Committee would have
8 problems with that, but I put that to the
9 Board.

10 CHAIRMAN DELGADO: Okay, Gerry?
11 Okay, any other questions? All right, well,
12 thank you very much, both of you. And we move
13 on to -- we're on schedule, fantastic, ahead
14 of schedule in fact. We move onto the
15 Livestock Committee with Dr. Karreman.

16 MEMBER KARREMAN: All right, thank
17 you, Rigo. Our first material for discussion
18 is one that -- well, it's Fenbendazole and
19 that we -- let's see the Board had looked at
20 Fenbendazole as a wormer for ruminants back in
21 the late '90s in kind of a little trio of
22 compounds, Ivermectin, Levamisole and

1 Fenbendazole and I don't know the whole
2 history of it except that Ivermectin passed at
3 that point and Fenbendazole didn't. But
4 regardless, a TAP review was done back then
5 and we relied on that TAP review because at
6 least nothing has changed to Fenbendazole that
7 I know of just as a clinician but -- and I
8 think that is accurate in general. The
9 formulation hasn't changed.

10 So what we recommended after going
11 through the checklist and everything, we did
12 recommend to allow it in a vote of five in
13 favor and zero opposed, two were absent, but
14 also to maintain the annotation which is a
15 paragraph long, I heard some resistance to
16 those long annotations yesterday, but to keep
17 the annotation as Ivermectin has it right now.
18 Should I read that because -- okay, there is
19 a slight addition to it, okay, right in the
20 beginning.

21 And the beginning part that I added
22 just from my experience being a farm vet, the

1 annotation would be for "Fenbendazole only to
2 be used upon a written diagnosis of clinical
3 infestation by a veterinarian," that's the new
4 part. And then it goes on to say, "Prohibited
5 in slaughter stock, allowed in emergency
6 treatment for dairy and breeder stock when
7 organic system plan approved preventive
8 management does not prevent infestation. Milk
9 or milk products from a treated animal cannot
10 be labeled as provided in Subpart D of this
11 part for 90 days following treatment and
12 breeder stock treatment cannot occur during
13 the last third of gestation of the progeny
14 will be sold as organic and must not be used
15 during the lactation period for breeding
16 stock."

17 This -- we didn't -- we had
18 discussion on this and it seemed to be pretty
19 straight up. I guess the Committee was
20 somewhat relying on my input being that I'm in
21 contact with that realm quite a bit and I can
22 say that it's -- one, it's better than

1 Ivermectin in the sense that I like that it's
2 a more narrow spectrum. It's got a different
3 mechanism of action. It doesn't affect the
4 dung beetles in the manure. It only --
5 Fenbendazole only works during the grazing
6 season and that's kind of good. You can't
7 just use it on and on throughout the year but
8 even so, you wouldn't be doing that in
9 organics, but it's just a more limited type
10 use of this compound for specifically gastro-
11 intestinal worms, whereas like Ivermectin you
12 can use it for skin-type mange and lice and
13 whatnot.

14 It's given orally. It's not given
15 by injection or pour-on. There's no long-
16 acting formulation. There's been no
17 resistance to it even in regular conventional
18 agriculture that's been noted. Very low
19 toxicity due to the mechanism of action so
20 it's a pretty safe compound. So anyway,
21 that's the way we discussed it and there were
22 no negative public comments. If anything, I

1 don't know how many, but they were all in
2 favor of us recommending it.

3 CHAIRMAN DELGADO: Okay, any
4 questions? Dan?

5 MEMBER GIACOMINI: As a member of
6 the Committee, it's not a question, but just
7 to make the statement that I don't think
8 anyone on the Committee would want this to
9 have the appearance that we're trying to
10 continually add more parasiticides on the
11 National List for dairy and breeder stock. I
12 think the goal of the Committee is to get the
13 best one. I think it's pretty universal
14 within the industry that we're not -- the
15 organic community and the livestock group
16 Committee or part of that is not happy with
17 Ivermectin.

18 The Board has passed Moxidectrin in
19 past. It originally met resistance with the
20 program as a macrolite antibiotic which is
21 more a structural definition than an activity
22 definition, and there seems to be some

1 movement there but how that will proceed is
2 out of our hands.

3 So the Committee in looking at this
4 wanted to -- decided to proceed with it and
5 sort of when all the dust settles, will look
6 and see what's on the list and hopefully then
7 the community will come back and will look at
8 taking off all but the best one, the best
9 option we would have.

10 CHAIRMAN DELGADO: Comments to add?

11 MEMBER KARREMAN: Yes, that's
12 correct.

13 CHAIRMAN DELGADO: Okay, Gerry.

14 MEMBER DAVIS: My question for Hu,
15 commonly what is the circumstance when a
16 material like this would be used? I hear all
17 the restrictions of when it can't be used.
18 What's the reality of how it is used?

19 MEMBER KARREMAN: Generally, I find
20 the weakest link in livestock husbandry and
21 organics and I do work with conventional herds
22 still but not too many, is the young stock

1 that are weaned that are about one to two
2 months away from weaning or that have been
3 weaned and they're one or two months beyond
4 that up to about 10 to 12 months old. Their
5 natural immune competency is not up to snuff
6 yet, their IGE to live in balance with worm
7 challenge like adult cows can, and so as well,
8 many times, I mean, a lot of farms, you know,
9 the young stock, different batches of young
10 stock go in the same area and parasites love
11 that when animals are in the same area all the
12 time.

13 And so that's the group that really
14 needs it, really truly, and you know, I take
15 manure samples, look under the microscope for
16 the eggs, see how many eggs there are and if
17 there's only very few and the animals look
18 good, I say, "Don't even worm right now with
19 Ivermectin," but if they look bad and they're
20 heavily infested, I say, "Let's use the
21 Ivermectin," and then start correcting things
22 again in an organic manner. So it's for the

1 young stock.

2 MEMBER DAVIS: Thank you.

3 CHAIRMAN DELGADO: Jeff?

4 VICE-CHAIR MOYER: Yes, just one

5 last comment, I wanted to second what Dan said

6 in that we would hope that the community after

7 this, assuming it does get approved, would

8 petition the Board to either remove other

9 substances or through the Sunset process get

10 those other materials off so the goal is not

11 to add more materials to the list, but to find

12 the best product out there that fits with the

13 organic production systems.

14 CHAIRMAN DELGADO: Good comment.

15 Dan.

16 MEMBER GIACOMINI: Yes, it's just

17 that that can't happen until it's on the list.

18 It's not -- it can't happen just based on our

19 recommendation. It has to be based on post-

20 final rule.

21 CHAIRMAN DELGADO: Good comment.

22 Steve.

1 MEMBER DeMURI: This is for Hu.
2 Not having a livestock background, this seems
3 to be a fairly complicated annotation to me.
4 Do you anticipate that any producers would
5 have trouble maintaining documentation to
6 prove these conditions were met?

7 MEMBER KARREMAN: The annotation,
8 the bulk of the annotation there has been in
9 place for the last -- well, since Ivermectin
10 got on, whenever that was, and the program got
11 started. So producers know that. They truly
12 know that they can't give it to beef stock,
13 beef animals that are going to be slaughtered
14 as beef and they can't give it within 90 days
15 of lactation. Okay.

16 The only thing that's added on here
17 is that it's got -- the use has to be
18 predicated on a written diagnosis by the
19 veterinarian. You can say, "Well, it's given
20 me work," but you know, honestly, it is an
21 over-the-counter type product, as is
22 Ivermectin, but I really think it's needed

1 only sometimes and I really think that the
2 healthcare provider really should write down
3 what they found, that they are infested and
4 they need it.

5 CHAIRMAN DELGADO: All right,
6 Barbara, I believe you had a comment.

7 MR. MATTHEWS: I have one concern.
8 I recognize that we already say this in
9 Ivermectin about when organic system plan
10 improved preventive management does not
11 prevent infestation. Now we're talking of
12 putting that into a second annotation. That
13 part of the annotation is totally unnecessary.
14 And the reason why I say that is that we
15 already have a regulation at 205.238(b) that
16 says when preventive practices and veterinary
17 biologics are inadequate to prevent sickness,
18 a producer may administer synthetic
19 medications provided that they're on 603.

20 And if anything, what the Board
21 might want to consider doing is what we've
22 already done to 601, which was at the lead-in

1 paragraph to 601, we reminded everyone, "You
2 have an obligation for fulfilling the practice
3 standards first and when all else fails, you
4 can use these materials. So rather than
5 adding it into every single material or just
6 some materials, you may want to consider
7 putting it into the lead-in paragraph because
8 this provision that you're talking about
9 putting in and which we've already got in
10 Ivermectin, is required of everything in 603.

11 MEMBER KARREMAN: I don't think
12 it's everything because they can --

13 MR. MATTHEWS: Okay, you're right.
14 It's not everything. It's for the
15 medications, yes, all medications are already
16 required that way. And so the paragraph at
17 the beginning would talk about which lettered
18 sections or lettered paragraphs within the
19 section would be applicable to following the
20 practice standards first.

21 And it's really important that
22 certifying agents be requiring that their

1 clients delineate in their organic systems
2 plan how they're going to exercise their
3 obligations for preventing sickness in
4 advance. And if it's not in the organic
5 systems plan and they're just allowing the use
6 of the materials, then they're violating the
7 regulations.

8 CHAIRMAN DELGADO: Hu?

9 MEMBER KARREMAN: That's fine.

10 We'll try to go that route. I would just say
11 that perhaps then on any medicine that's
12 listed on 603 but still just staying within
13 Fenbendazole, I would say at least for
14 Fenbendazole, only to be used upon written
15 diagnosis of clinical infestation by a
16 veterinarian. Is that an okay annotation,
17 short and sweet like that?

18 MR. MATTHEWS: Sure.

19 CHAIRMAN DELGADO: But that would
20 also imply that you need a second motion to
21 put that clarification at the top of the
22 section, if I interpret correctly. Are you

1 following that?

2 MEMBER KARREMAN: Well, I think
3 we'll have to have a Livestock Committee
4 meeting to reduce this bulky annotation here
5 and then in the next few months, probably not
6 in this meeting time, but well, okay, maybe at
7 this meeting time by those faces, we can get
8 that preamble onto 603.

9 MR. MATTHEWS: Don't get me wrong,
10 I'm not criticizing the bulkiness of the
11 annotation. What I'm clearly or trying to say
12 is that there's a redundancy here because it's
13 already required and if we feel that there
14 needs to be a reminder, the best place to put
15 it is at the beginning of the section so that
16 everybody knows in advance where it's supposed
17 to be.

18 I have no problem with saying you
19 can't use it in slaughter stock. That needs
20 to be clear. I have no problem with saying
21 that it has to have a withdrawal period for
22 dairy animals. That needs to be stated. So

1 it's not so much that I have a problem with
2 the length of the annotation. It's the
3 redundancy.

4 CHAIRMAN DELGADO: Very good. So
5 that will be an action item for your Committee
6 and you'll decide and tell us tomorrow. I
7 believe there's another question, participant,
8 Dan. Hu, do you want to add another comment
9 to that?

10 MEMBER KARREMAN: No.

11 CHAIRMAN DELGADO: All right. If
12 that's the case, we can proceed onto the next
13 material.

14 MEMBER KARREMAN: All right, the
15 next material, let me get that up here for a
16 second, is Methionine. Methionine has an
17 interesting history with the Board. I think
18 it's the only livestock material that's been
19 added since 2002, except for this last batch
20 in December. It was renewed -- let's see the
21 first time it came on and perhaps there's
22 institutional history here but the first time

1 it came on, it had a three-year time limit put
2 on it, from 2002 to 2005 in the hopes that
3 there would be research to show that there
4 could be non-synthetic Methionine available.

5 When that time was coming around
6 there was a petition to extend it and right
7 now, we've living under that time line and it
8 would expire October of this year, 2008. So
9 the petitioners requested that the time limit
10 or -- it's not a Sunset but I don't know what
11 you'd call it, just a removal date would just
12 be --

13 CHAIRMAN DELGADO: Expiration,
14 expiration date.

15 MEMBER KARREMAN: Expiration date,
16 yes, would be deleted, that's it, so there's
17 no expiration date on synthetic Methionine for
18 use in poultry and I want to specify that it
19 is only allowed in poultry and organic
20 livestock, no other species.

21 The Committee voted five opposed to
22 that and zero in favor of that action to

1 remove the deadline date. And we immediately,
2 however, and believe me, we had a lot of
3 discussion on this material, and we can get
4 into that more, but we immediately came up
5 with a new proposal or proposed removal date,
6 expiration date of October 2010 to allow two
7 more years of synthetic Methionine to be used
8 in rations for certified organic poultry.

9 The reason we went for two years
10 and not just taking the expiration date off
11 totally is because of some work that has been
12 happening and I went to the Upper Midwest
13 Organic Framing Conference this past February
14 and I sat in at Dr. Walter Goldstein's really
15 informative talk on the agronomy of
16 Methionine and high Methionine corn and from
17 what I could glean from that talk, there's
18 high Methionine corn, if everything is ideal
19 commercially available in quantity hopefully
20 within about three year's time. And so I took
21 that into account and I shared that with our
22 Livestock Committee.

1 And then also during the
2 Aquaculture Symposium, there was a fellow
3 from South Carolina, I forget the company, I
4 apologize, but he talked about insect meal and
5 that kind of thing and showed the analyses and
6 there was Methionine in there and then I think
7 there's some work having been done on
8 fermentation to derive Methionine that way but
9 there's not any hard data from what I
10 understand but there's work on that.

11 Then, of course, the other way to
12 look at Methionine is that the birds, you
13 know, traditionally, I guess you could say,
14 you know, get their Methionine from pecking at
15 the ground for grubs and insects and whatnot.

16 So taking in those four factors, I
17 think is why we decided not to allow the
18 extent or the expiration date to just vanish,
19 but to give two more years to hope that the
20 industry, you know, can get over that hump
21 that I think we're kind of almost at the top
22 at from what I'm understanding and so that's

1 our reasoning on that.

2 CHAIRMAN DELGADO: Any questions?

3 Gerry?

4 MEMBER DAVIS: Hu, the talk that
5 you listened to on the high Methionine corn,
6 I remember getting some information off the
7 internet two years ago on the high Methionine
8 corn and it was probably from the supplier or
9 the breeder of that particular variety or
10 varieties. And they were asking for people to
11 grow this corn so it would be more universally
12 available for organic growers to use for
13 poultry.

14 Did that talk address what's taking
15 them -- you know, two years down the road, you
16 would think there would be good development so
17 far on that.

18 MEMBER KARREMAN: Dr. Goldstein is
19 in the room. We can ask him to come up and
20 address that briefly in a moment. I guess,
21 you know, I'm just -- that question, you know,
22 regarding, okay, if you're allowed to use

1 synthetic Methionine or if there is a loophole
2 to get non-organic seed or other kind of
3 little loopholes that kind of don't, you know,
4 give the full stimulation of organic, you
5 know, progress, I think we as a Board, like
6 you're saying, somewhat are incumbent to maybe
7 move the industry forward and so I think there
8 may not be that many growers but I want to
9 hear that from Dr. Goldstein first, or there
10 may be, but if we don't have them at -- yes,
11 that we have Methionine public comment. Yes,
12 I know, there's a lot of folks here. So we'll
13 hear from them, but to answer his question,
14 perhaps Dr. Goldstein should --

15 CHAIRMAN DELGADO: Absolutely, I
16 would like to call Dr. Goldstein to the podium
17 if he is present.

18 DR. GOLDSTEIN: I'm Dr. Goldstein.

19 CHAIRMAN DELGADO: Thank you for
20 responding. We have specific questions for
21 you and as I recall correctly, the question
22 is, do we have enough sources of Methionine

1 coming up in the near future?

2 MEMBER DAVIS: Yes, two years ago
3 there was a call from this developer of the
4 high Methionine corn to you know, we need to
5 get this out here and grow the supply of this
6 corn, so it can be available. What's happened
7 in the last few years that makes it still in
8 the status of not fully developed, I guess, as
9 far as supply?

10 DR. GOLDSTEIN: Well, we have been
11 moving forward in terms of trying to get seed
12 for growers and we have produced seed, for
13 example in Chile, with help from the
14 Methionine task force this last winter. It's
15 just arrived and we're about to get it out to
16 farmers and to different people who will test
17 it.

18 We are on a learning curve and a
19 developmental curve with high Methionine corn
20 and the learning not only is agronomic, it's
21 also developmental in terms of getting farmers
22 interested in it, getting seed growers

1 interested in it, getting the Methionine end
2 user, the poultry producer, to invest in it.
3 So it's bringing along the whole gamut of
4 players that is, perhaps, the most difficult
5 part of the whole thing.

6 MEMBER DAVIS: And your affiliation
7 is?

8 DR. GOLDSTEIN: I work for Michael
9 Fields Agricultural Institute. We're a non-
10 governmental organization in Southeastern
11 Wisconsin for sustainable and organic farming,
12 and we've been breeding corn. Our project is
13 a team project together with the USDA and --

14 MEMBER DAVIS: So your organization
15 is the holder or the breeder of this type of
16 corn.

17 DR. GOLDSTEIN: Right, we breed
18 corn and we also use corn from our
19 cooperators.

20 MEMBER DAVIS: Thank you.

21 CHAIRMAN DELGADO: All right, we
22 have a question for the doctor from Katrina

1 followed by -- Katrina.

2 SECRETARY HEINZE: Could you just
3 repeat your affiliation so I can get it down?

4 DR. GOLDSTEIN: Michael Fields
5 Agricultural Institute.

6 SECRETARY HEINZE: Thank you.

7 CHAIRMAN DELGADO: Any other
8 questions?

9 MEMBER KARREMAN: I have one
10 question.

11 CHAIRMAN DELGADO: Hu.

12 MEMBER KARREMAN: I think, you
13 know, with the expiration date, if we give two
14 years now, we're recommending that, will that
15 stimulate these growers that might be growing
16 it or you know, is it just going to kind of
17 keep kind of -- I don't know -- spinning
18 wheels in a sense? I hate to put it that way
19 but we want the high Methionine corn to come
20 in as well as other methods of feeding the
21 birds hopefully, in an organic way, so what's
22 your feeling on, you know, the stimulus for

1 those corn growers to do that?

2 DR. GOLDSTEIN: I think the two
3 years is certainly a stimulus. It's also a
4 time in which we could, with the full backing
5 of the industry, the poultry industry, we
6 would be able to get quite a bit of seed
7 produced, perhaps not sufficient for everyone
8 but getting closer. And I have some figures
9 that I'll present later at my presentation on
10 that.

11 I think the whole thing has to be
12 industry driven. There has to be buy-in from
13 the poultry companies and I'm seeing that
14 happening with the activity of the Methionine
15 task force. I'm very excited about their
16 inputs at this point.

17 CHAIRMAN DELGADO: Joe, followed by
18 Tracy.

19 MEMBER SMILLIE: It's both for
20 Walter and Hu. When I heard two years, I
21 thought, you know, that's a short period of
22 time. That's two growing seasons and I'm just

1 wondering why you picked two years, Hu, and
2 Dr. Goldstein, whether you think that that's
3 an adequate amount of time.

4 CHAIRMAN DELGADO: Hu?

5 MEMBER KARREMAN: I think the
6 reason we picked two years partially was based
7 on hearing your talk out in Wisconsin that in
8 three years' time if there's ideal conditions,
9 you have in Hawaii there's corn coming on and
10 there would be commercially available in
11 sufficient amounts. That was part of it, if
12 I remember that right. And that would be in
13 three years.

14 But then we also want to see -- I
15 guess, you know, representing the organic
16 community, I guess you know, we want to
17 hopefully see a diversity in diet and not just
18 -- you know, I mean poultry are omnivorous
19 animals. They're not herbivores and a lot of
20 the -- I think the organic birds are perhaps
21 being fed a fairly herbivorous diet with the
22 synthetic Methionine. And I think we need to

1 let the animals express their natural behavior
2 more and perhaps have a more diversified diet
3 and therefore, we put two years instead of
4 three so that some of these other factors that
5 I mentioned of those four would play in.

6 CHAIRMAN DELGADO: Do you want to
7 complement that answer, Kevin?

8 MEMBER ENGELBERT: Yes.

9 CHAIRMAN DELGADO: Please go ahead.

10 MEMBER ENGELBERT: Also, Joe, as
11 simple as it seems, the last time it was put
12 on was just for three years and we decided
13 that two would make it a full five for the
14 normal Sunset process and let that be the --

15 MEMBER SMILLIE: But this isn't a
16 Sunset process.

17 CHAIRMAN DELGADO: No, no, it's
18 not.

19 MEMBER SMILLIE: And I am a little
20 confused. Maybe I'll wait until tomorrow but
21 I'm not quite sure what we're going to be
22 voting on tomorrow but you'll fill us in on

1 that because this document simply is rejecting
2 the removal of the time limit.

3 MEMBER ENGELBERT: Yes, but then we
4 -- there's a second document we voted on
5 immediately afterwards, and I'm -- literally
6 immediately for a two-year extension after all
7 our discussions.

8 CHAIRMAN DELGADO: Okay, so there's
9 two motions, just to clarify. One is to
10 reject the petition and the other one is to
11 extend it two more years.

12 MEMBER SMILLIE: And I still would
13 like to get Dr. Goldstein's opinion on the two
14 years for seed development.

15 CHAIRMAN DELGADO: That's right,
16 that's pending. Please, can you answer that
17 question?

18 DR. GOLDSTEIN: Well, we're doing
19 somewhat of a rush job. We're taking the best
20 corn that we have, we're making trials on it
21 in different states. We're analyzing it.
22 We're doing the best we can to get the seed

1 out within the two years. Three years would
2 be more comfortable. The problem is that we
3 need to make some fundamental changes and
4 fundamental things have to come into place.

5 We have a new product. We have a
6 price issue, what's it going to cost? There
7 has to be relationships established between
8 seed companies and the poultry companies that
9 aren't there in place right now. There has to
10 be incentives for farmers to grow it, so the
11 farmers are the other link that has to be
12 worked out. Two years, we certainly could
13 have quite a bit of seed there, particularly
14 if industry was willing to invest in growing
15 seed in Chile for a winter period, we probably
16 would have sufficient seed.

17 So there's all these different
18 factors that are in play here.

19 CHAIRMAN DELGADO: Okay. Tracy,
20 followed by Jennifer.

21 MEMBER MIEDEMA: If we get it wrong
22 in our prediction that there will be non-

1 synthetic alternatives available by October
2 2010, what will start happening and how soon
3 to the chickens, the eggs, the organic egg
4 industry?

5 MEMBER KARREMAN: Well, that's
6 definitely why we didn't take the -- that's
7 why we didn't allow the expiration date to
8 actually take effect this October, okay,
9 because we don't want to see just a disruption
10 in the industry.

11 But we certainly want to have the
12 stimulus to look for alternatives and this has
13 been discussed twice before by two Boards and
14 here we're discussing it again and Dr.
15 Goldstein and others are trying to do as good
16 a research as they can. But I'd like to --
17 Dan, do you mind if I -- you know, Tracy's
18 question was regarding the health of the birds
19 and whatnot and the nutrition. Do you have
20 some thoughts on that?

21 CHAIRMAN DELGADO: Before we
22 continue, do we have any more questions for

1 Dr. Goldstein. I want to make sure that's the
2 case. Jennifer.

3 MEMBER HALL: Thank you. Dr.
4 Goldstein, mine is similar and I'm curious in
5 your trials, if it's strictly the growing of
6 the corn or if it is -- if it does include
7 trials on the impact of what I see as the end
8 user which is the bird?

9 DR. GOLDSTEIN: Both. Agronomic
10 trials to find out what the yield penalty
11 might be for growing these corns relative to
12 growing normal hybrids, but also feeding
13 trials together with our colleagues from
14 University of Minnesota, Organic Valley, we've
15 done both broiler and layer trials with our
16 corn, with quite favorable results.

17 CHAIRMAN DELGADO: Okay, any other
18 questions for Dr. Goldstein? Tracy, are you
19 satisfied with the answer so far?

20 MEMBER MIEDEMA: I don't know that
21 I got an answer to, you know, how soon would
22 we start seeing effects and what are the

1 effects, I mean, just in lay terms of someone
2 not very familiar with what the benefits are
3 of Methionine to eggs and to the birds? What
4 would start happening, you know, say, two
5 months in?

6 CHAIRMAN DELGADO: I believe, Dr.
7 Goldstein, could you answer that and then --

8 DR. GOLDSTEIN: I believe my
9 colleagues, who are going to give testimony a
10 little bit later on will answer that. I think
11 they're quite prepared in that direction.

12 MEMBER MIEDEMA: Okay, that's fine,
13 thanks.

14 CHAIRMAN DELGADO: Okay, in that
15 case, thank you very much for addressing our
16 group. You have a comment, please proceed.

17 MEMBER GIACOMINI: Okay, the
18 evolution of this petition was ongoing and
19 rigorous, I think, and there was a minority
20 opinion that's expressed and in the
21 recommendation and I would just like to make
22 a few points that led to that point as the one

1 no vote on the Livestock Committee and the
2 writer of that document, that part of the
3 document.

4 It was very disturbing to me,
5 number one, for the petition to be saying that
6 we're very close to an alternative but the
7 solution that we want you to deal with right
8 now is to take off the incentive and the push
9 to -- of any expiration date at all. That
10 didn't seem to make a lot of sense to me.

11 One person I was talking to
12 yesterday said that that was based on the
13 advice of an attorney and I guess all I'll say
14 for that is maybe sometimes you should talk to
15 another attorney because that does not go --
16 did not go over well with the Committee.

17 The second part of that, as we
18 looked at the data that was presented with the
19 document, and the possibility of looking at a
20 two-year expiration date, three year, whatever
21 we were going to look at, I'll repeat what I
22 said at the last meeting, that I would be --

1 I would never want to see a loss of the
2 poultry industry or any part of it because of
3 such a restriction and a loss of such a small
4 amount of the diet as what we're doing with
5 Methionine.

6 But that being said, we have to
7 really need it, and the data that was
8 presented with the petition was essentially --
9 it did discuss the theoretical pure diet type
10 effects of having no Methionine; health,
11 immunity, feathers, cannibalism, all sorts of
12 things. But when the data was presented that
13 looked at specific trials with additional --
14 the additional Methionine removed from the
15 treatment, the only data that was presented
16 was less growth. There was no immunity, there
17 was no health issues presented.

18 And being someone who works in the
19 industry and the livestock sector of this, the
20 ability to match conventional performance
21 rates is not a justification to add synthetic
22 substances to the National List in my mind and

1 I don't think we do that in other sectors. So
2 I'm more than welcome and I hope we have some
3 presentation of some real health issues, not
4 just theoretical of pure diets where no
5 Methionine was present, but based on current
6 diets with current feeds, modern feedstuffs,
7 where we're looking at what that difference
8 would be and I'm not even saying that it would
9 take a lot.

10 There was one public testimony that
11 was handwritten and scanned in where it was
12 simply a gentleman saying, you know, "I raise
13 birds, and birds will die." That's almost
14 enough because it's a real testimony and it's
15 not just theoretical. But if we are going to
16 give a performance exemption on this product
17 and we are going to go put it on in two years,
18 simply for consistency and there's parts of
19 the industry that will want to tear me apart
20 on this, but simply for consistency I don't
21 see limiting it to poultry. If we're going to
22 -- if all the presentation that they can make

1 is performance, we've got aquaculture coming
2 up, we've got pet food issues, we've got other
3 things that will probably be coming up before
4 this two-year expiration date is done and
5 giving this exemption only for one small
6 sector of the industry when the only data
7 presented is performance, I don't think is
8 consistent. But I would more than welcome and
9 hope that we see some real health data
10 presented.

11 CHAIRMAN DELGADO: Thank you for
12 that comment. Any other questions related to
13 the proposal? Okay, should we --

14 MEMBER KARREMAN: That's it for the
15 livestock presentation right now.

16 CHAIRMAN DELGADO: Okay, thank you
17 very much. It is now 10 before 12:00 o'clock
18 which is very good. I appreciate the fact
19 that we are ahead of schedule. The next item
20 on the agenda is the welcome lunch period. So
21 we'll recess for lunch and come back here
22 exactly at 1:00 o'clock if you will, 1:10, so

1 we can continue with the scheduled agenda.

2 Thank you.

3 (Whereupon, a luncheon recess was
4 taken at 11:51 a.m.)

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17 A-F-T-E-R-N-O-O-N S-E-S-S-I-O-N

18 (1:05 p.m.)

19 CHAIR DELGADO: Okay. We have a
20 quorum and we're back in session. We'll
21 continue with the second part of our agenda
22 for today, and that includes Livestock

1 Committee with Dr. Karreman talking about
2 aquaculture.

3 DR. KARREMAN: All right. Thank
4 you, Rigo. So we're going to talk about our
5 recommendation, proposed recommendation for
6 the use of fish meal and fish oil in the
7 proposed aquaculture standards. It's posted
8 up there on the screen.

9 So, basically, we needed to clarify
10 the fish meal/fish oil issue since we put that
11 on hold since last spring as a contentious
12 issue that has to be kind of balanced within
13 the organic community. And we had our
14 symposium last November, which I think we all
15 still feel was a very good educational day,
16 and we learned a lot from that. And so then
17 we, as Livestock Committee, re-huddled over
18 many phone calls, definitely the vast majority
19 of all our phone calls since December until
20 early April about fish meal and fish oil, and
21 taking into account what the Aquaculture
22 Working Group had proposed, and came up with,

1 based on very sound science from their
2 producers and Ph.D. nutritionists, as well as
3 the symposium panelists, as well as, for sure,
4 public comment, the following points kind of
5 helped come up with this recommendation that
6 we posted, which has been posted already on
7 the site.

8 So while respecting current
9 knowledge of the nutritional needs of aquatic
10 animals for fish and fish oil, there are
11 potentially certifiable organic alternatives
12 becoming available, but to what extent is an
13 open question. Certified organic fish meal
14 and fish oil would be expected to become
15 increasingly available as the aquaculture
16 industry would grow. To insure that the diets
17 are nutritionally complete at the beginning of
18 any aquaculture program that might start, we
19 propose that the aquatic products of other
20 certification systems be allowed via 7 USC
21 6505, Section 2106(b).

22 By doing this, we would reduce the

1 depletion of existing wild caught fisheries as
2 a direct feed to any industry that would start
3 here, as well as promote aquatic products from
4 organically managed and, hence, sustainable
5 systems that are already elsewhere
6 established, like with the Soil Association
7 and Tourland, and that's what we're kind of --
8 that was our thinking there. This will allow
9 the nascent USDA certified aquaculture
10 industry the needed time to establish enough
11 basic feed for itself.

12 And since aquatic species are
13 considered livestock under OFPA, we should
14 also promote their natural behaviors. And
15 since many species of fish - and, honestly,
16 the Livestock Committee certainly was looking
17 at the whole spectrum of fish. I mean, not
18 that we talked about every fish species, or
19 family, or genus out there, but not one
20 specific kind of fish that guided any of our
21 thinking, it's to incorporate them all. But
22 a lot of species are piscivorous, or eating

1 other fish in the ocean, and that should be a
2 goal of nutrition in organically managed
3 animals, so that they're eating a natural
4 diet.

5 And then we talked a little bit
6 about the fish oils that the organic consumers
7 that consume fish also don't want to probably
8 have any terrestrial type of animal parts
9 being fed to organic fish. We took that into
10 account. And, also, the need for the -- if we
11 only feed plant-based feeds to the marine
12 fish, their Omega-3 content, which is
13 something that the consumers look for, might
14 not be there, or in a different kind of fatty
15 acid profile.

16 An earlier version of what the
17 Livestock Committee was talking about would
18 have included that fish meal and fish oil from
19 wild caught fish, and other wild aquatic
20 animals produced from sustainable food grade
21 fisheries, or sustainably managed foraged
22 fisheries could be allowed in the following

1 step-wise levels. No more than 12 percent
2 during year one through five, and then no more
3 than six percent during year six through
4 eight, and no more than three percent during
5 year nine through ten, with the percentages
6 being on average over the production cycle of
7 the aquatic animal life. That is still
8 retained in the Minority Report that is
9 attached to the back of this proposal.

10 We also had talked about in our
11 conference calls discussions between December
12 and April about creating a provisional-type
13 label until there would be enough fish
14 oil/fish meal harvestable from certified
15 organic fish. And that would have had a 10-
16 year life span, as well. But that did not
17 make it into our recommendation, so with all
18 that background, we would like to insert - I'm
19 going to do the aquaculture feed first, but we
20 also have .251 we'd like to insert, the Origin
21 of Aquaculture Animals, but I'm going to do
22 the Aquaculture Feed first, and that's

1 205.252. Let's see. I don't need to read
2 through all of them. Which one was that?
3 Sorry, just trying to find where -- I don't
4 have to go through all of them, do I?

5 (Off the record comments.)

6 DR. KARREMAN: Okay. Sorry. So
7 we're recommending to insert .252 A-M as
8 posted, and we voted yes, in favor, one
9 opposed, and one absent, as far as aquatic
10 feed. There was a minority opinion from the
11 one no vote, and perhaps that dissenting
12 opinion, you might want to talk about the
13 minority opinion, so if I may give it to Dan.

14 CHAIR DELGADO: Dan.

15 MEMBER GIACOMINI: Thank you, Rigo,
16 and Hugh. In reviewing this topic, and I
17 apologize to everyone, appearing as Mr.
18 Minority Opinion today, but I started looking
19 at this, trying to consider all the
20 stakeholders, and all the options, and from my
21 own background, and education, and experience.
22 And it seems to me that with the growing world

1 population, a diet of high Omega-3 fatty acids
2 is going to continue to be a positive health
3 aspect for the human population. And if we're
4 going to meet that, we want to try and do that
5 without devastating our ocean fisheries. And
6 in order -- and if there are problems in
7 conventional aquaculture, can we work with the
8 fundamental basics of the organic principles?
9 Granted, we're not dealing with soil, but can
10 we use those principles to improve on the
11 problems that we're seeing in the conventional
12 aquaculture to help us achieve these goals.
13 And so that was my framework, and where I'm
14 coming from in trying to work through this
15 information to come up with a workable
16 solution.

17 My opposition in the wording of the
18 existing report has a couple of points.
19 Number one is that I question our ability to
20 essentially tell the secretary what to do, to
21 we currently do not have any full equivalency
22 agreements on organic regulations with any

1 countries, as I understand it. Telling the
2 secretary to make it okay, and just call
3 organic, all the foreign organic fish meal and
4 fish oil seems very presumptuous to me.

5 I, also, am very uncomfortable with
6 the inequity that that puts on -- would put on
7 the U.S. Organic Aquaculture farmers part of
8 the industry; whereas, I could see fish meal
9 and fish oil being traded between the salmon
10 and the sea bass people in Chile, and the U.S.
11 farmers wouldn't have any access to it, but
12 Chile would be shipping in organic sea bass,
13 and organic salmon to our regulations.

14 When I further look at the
15 regulatory issues involved, and I look to
16 OFPA, Section -- we have the issue that we
17 keep coming back to of, if it's organic, it
18 has to have an organic diet. And the -- but
19 when I look to OFPA, it not only says that,
20 and even though in my reading it may say it a
21 little bit differently in OFPA than it says it
22 in the regulation, it also has Section 2107

1 that says that with certain consultations, the
2 Secretary shall allow wild caught to be
3 certified or labeled as organic. And with
4 those two sections in there, I guess I'm going
5 to give credit to Congress that maybe some
6 other people wouldn't necessarily want to get.
7 I think they were aware that both parts were
8 in the Bill, and that the fact that that is
9 there, maybe there is some intention of - I
10 don't know what it is - but maybe there is a
11 way through the regulatory process that this
12 can be found, a working solution to this can
13 be found. And I would like to give the
14 industry and the regulators the opportunity to
15 try and discover that, rather than just
16 presenting them with a document that does not
17 have those points.

18 Finally, I have a fundamental -- a
19 final point that makes me extremely
20 uncomfortable, on the one hand, but I think
21 it's something we need to recognize on the
22 other. We keep hearing that wild caught

1 cannot be organic because of a number of
2 reasons. Some of that is contamination, but
3 the essence of it is that they are not
4 managed, and that they are not "agricultured."
5 If wild caught fish, in my mind, are not
6 agricultured, then they should not be
7 considered livestock. And if they're not
8 considered livestock, then the fish meal and
9 fish oil from those would be viewed entirely
10 differently as being sourced from livestock,
11 and being sourced from an agricultural source.

12 So, I think that's an aspect that
13 hasn't been looked at at all. And I realize
14 that may not be a very popular idea, but I
15 think when I really sit down and look at what
16 OFPA says, the law says, that's kind of the
17 conclusion I come to. That then brings us to
18 the question of what is the definition of
19 livestock, which just lists aquatic species,
20 which seems to be a little contradictory in
21 that sense also. But I -- to come around, I
22 have a number of problems with the report,

1 with the recommendation.

2 I recommend that we go back and
3 institute the step-down, insert the step-down
4 language into the recommendation to give the
5 rule making process and the stakeholders a
6 chance to see if there's a workable solution
7 that does fit in with the way we are currently
8 looking at regulations and laws.

9 CHAIR DELGADO: Back to you, Hugh.

10 DR. KARREMAN: Thanks, Dan.

11 Certainly, those discussion items are very
12 clear in my mind still from all our calls.

13 Under OFPA, livestock definition
14 does include fish used for food, it's not just
15 aquatics, so it's difficult with OFPA. But
16 since it does say wild caught can basically be
17 considered, that's why I think we came up with
18 that foreign certified that may use live
19 caught, or wild caught, just their carcasses,
20 trimmings and whatnot could be used for fish
21 feed, but never to be sold here in the U.S. as
22 final human product, those fish, just the

1 trimmings. Because if the industry is going
2 to start, it's got to have something to start
3 with. You've got to feed the animals, and
4 after a lot of deliberations, and you were
5 part of it, we all were in Livestock, I think
6 we feel that we came up with the best possible
7 way to start the aquaculture industry, and
8 honestly not just tilapia and catfish, because
9 that could take a very, very long time. And if
10 they're farmed, they might not have the right
11 profile of essential fatty acids and whatnot,
12 that other fish that might have been fed wild
13 caught would have, that are certified organic
14 under sustainable conditions and whatnot. And
15 so that's how we came up with the foreign
16 inclusion.

17 And, also, from public comment,
18 actually, from George Lockwood and their
19 public comment, is to go back to what they
20 proposed last year, essentially. However, in
21 a way, if we would consider foreign certified
22 allowable, but also include our prohibitions

1 on the fish feed coming in as foreign
2 certified, but that that fish, carcasses,
3 viscera, and whatnot trimmings have to be from
4 animals that were not give parasiticides, and
5 not given any antibiotics. And, Joe, you
6 mentioned that yesterday, how that's very
7 limited, it sounds like. And perhaps they
8 could do that in those areas, and then we
9 would be relieved of that major hurdle with
10 the antibiotics and parasiticide use.

11 We feel that this is our best try,
12 after a lot of talking. And the minority
13 report also reflects our thoughts and
14 discussions, and we just -- I guess we need to
15 know a little bit perhaps how the Program
16 feels about looking at foreign sourced
17 certified feed for fish. We haven't really
18 gotten any feedback from the Program at all on
19 that, but the provisional label, I think we
20 got some feedback where that just probably
21 won't fly.

22 CHAIR DELGADO: Would members of

1 the Program like to comment? The answer
2 appears to be yes, but they need time to find
3 the answer. Are you ready?

4 PARTICIPANT: Not yet.

5 CHAIR DELGADO: Let's continue with
6 other questions, and then we can come back to
7 pose that. Jeff?

8 VICE CHAIR MOYER: Hugh, the other
9 point that I think was brought up, I brought
10 it up yesterday, but it was brought up a lot
11 during our discussion, was that in light of
12 the fact that we don't have a certification
13 program for aquaculture currently, foreign
14 certified fish products are being sold in the
15 supermarket today in the United States as
16 human food. And what we're talking about is
17 taking a byproduct from them, and using them
18 to feed fish that would now be certified under
19 our standards, so I think the standard that
20 we're proposing is quite a bit higher in terms
21 of the proportion of the foreign certified
22 material that would be consumed by humans in

1 this country from what it is, down to the
2 current lack of any standard.

3 CHAIR DELGADO: Good point. Okay.
4 Dan, you had a comment.

5 MEMBER GIACOMINI: I just would
6 like to clarify something that you just said
7 a second ago there, Hugh. As I remember, the
8 Aquatic Working Group said that they preferred
9 their 12 and 12, but they would accept the
10 step-down as a reasonable -

11 DR. KARREMAN: Yes. That's
12 correct. Sorry. I retract that, what I said.

13 CHAIR DELGADO: Thank you. Any
14 other comments? Joe.

15 MEMBER SMILLIE: I'd be pleased to
16 provide a gap analysis of a limited number of
17 foreign certification programs; namely, two,
18 that shows where and when they could be out of
19 compliance with our interpretation of the U.S.
20 regulations, so there's two caveats there.
21 It's just, it's an interpretation of where
22 they could be out of compliance. But we could

1 -- I could come up with that document, if that
2 -- if the path that you're headed down proves
3 fruitful, and there is some consideration of
4 allowing it, we could come up with a gap
5 analysis that showed the difference between
6 current foreign and national aquaculture
7 programs that are -- where they could possibly
8 be out of compliance with the interpretation
9 of the current regulations; namely, the
10 parasiticides and antibiotics, if that channel
11 proves fruitful.

12 CHAIR DELGADO: Any comments on
13 your part? I believe Barbara is ready to give
14 a response. Please go ahead.

15 MS. ROBINSON: Let me understand
16 this. You want the Program, or you want to say
17 that the feed which is made from the fish,
18 which is not organic, you want to accept that.
19 All right? But the fish itself, the filet,
20 you're not going to allow as food for humans.

21 DR. KARREMAN: If this proposal is
22 accepted, yes. Once that would happen, if

1 this were to take place, that foreign
2 certified organic fish can be used as chum, or
3 feed.

4 MS. ROBINSON: Correct.

5 DR. KARREMAN: Then the Program
6 here would be rolling, and there would be no
7 more foreign certified filets on the market
8 anymore, because then the -- isn't that what
9 we're talking about? They'd have to meet our
10 standards. Sorry. Once the standards here
11 would be in place, the only foreign stuff
12 coming in would be to feed USDA certifiable
13 organic fish. There would be no not tour land
14 or whatever filets on the market in Florida or
15 whatever.

16 MS. ROBINSON: This is illogical.
17 You're not being logical about this, I don't
18 think. You know, it's not good enough for us
19 to eat, but it's okay to feed to fish.

20 DR. KARREMAN: Just for regulatory
21 purposes, yes.

22 MS. ROBINSON: All right.

1 (Laughter.)

2 CHAIR DELGADO: Let's have -

3 MS. ROBINSON: And, moreover, we
4 have -- as I recall, excuse me. As I recall,
5 we lost a lawsuit over this issue.

6 VICE CHAIR MOYER: If I could
7 attempt to clarify the comment, Barbara, that
8 Hugh is making, and that this proposal is
9 making. What we are stating in this
10 recommendation is not that we take uncertified
11 product. We're taking product that is
12 currently not certified by U.S. standards,
13 because we have no U.S. standard.

14 MS. ROBINSON: Understood.

15 VICE CHAIR MOYER: And right now,
16 there's currently fish on the market today
17 that is being sold as certified organic, under
18 private label in this country.

19 MS. ROBINSON: Right.

20 VICE CHAIR MOYER: What we're
21 suggesting, the recommendation suggests is
22 that we use the trimmings from that fish, not

1 the fish itself, but the trimmings from that
2 fish to supplement, to be the portion of the
3 feed that represents the fish oil and fish
4 meal portion of the feed for fish that would
5 then be certified under U.S. standards. All
6 other portions of the feed would have to fit
7 under the U.S. standard until the point where
8 there is enough U.S. market to supply the oil
9 and meal content portion. Does that help?

10 It's very confusing, I understand.

11 DR. KARREMAN: Would it also
12 perhaps help to maybe call that, going back to
13 the term "supplement", we have like a foreign
14 certified organic fish meal and fish oil
15 supplement.

16 VICE CHAIR MOYER: Well, it is, but
17 -

18 DR. KARREMAN: Instead of like a
19 feed.

20 VICE CHAIR MOYER: It is, but at 24
21 percent of the -

22 DR. KARREMAN: I realize that.

1 VICE CHAIR MOYER: -- food, that's
2 a heck of a supplement.

3 MS. ROBINSON: Well, we need to -

4 CHAIR DELGADO: Let's make sure.

5 Barbara, are you going to answer that?

6 MS. ROBINSON: We need to think
7 about this, but it's -- because -- let us
8 think about this. You know, I'm loathe to
9 give you answers just off the top of our head.
10 We usually get into trouble here, but it's
11 just -- because I really do want to make sure
12 that there's a logic and consistency here.

13 Jeff, you raise a good point. I
14 mean, I do need to know, first of all; we need
15 to know are we just talking about the
16 supplement part of this?

17 VICE CHAIR MOYER: Yes, we are
18 talking about the 12 -- currently, what we're
19 talking about is the 12 percent fish meal, 12
20 percent fish oil, which is -- if you add that
21 up it's 24 percent, if my math is correct, so
22 it is a fair chunk of the diet. Too much to

1 actually be called a supplement, but it is
2 that portion of the feed that is unavailable
3 currently from any organic source, because we
4 have no organic standard in this country. And
5 so, taking the fish that is currently being
6 accepted by consumers as organic under private
7 label, and taking just the portion of that
8 that's not being sold here for human
9 consumption that's currently the viscera and
10 the trimmings, using that to create the oil
11 and meal portion, because it is coming from a
12 certified organic - it's not our standards, we
13 understand that - but it is currently accepted
14 by the public as certified organic, or as
15 organic. Using that portion to fill that
16 niche of that -

17 DR. KARREMAN: And we could have a
18 phase-out, as well.

19 VICE CHAIR MOYER: Right. But once
20 they want to sell fish in the U.S. to our
21 standards, all of that material would have to
22 meet our standards, so it's a very -- I mean,

1 it's hard to tell at this point what that
2 window would be until even those trimmings
3 would meet our standards. But if they intend
4 to market any of their fish product here in
5 the future, they would have to adhere to our
6 label, thereby, those trimmings would have to
7 adhere by our label, too. Gets us out of the
8 wild caught version, and it also gets us away
9 from the idea of a step-down version, which,
10 in my mind, has tremendous potential for
11 failure in the marketplace with consumers. If
12 you have a step-down process, and the industry
13 fails to meet that, by the rule, what would
14 happen is one day it would be organic, and the
15 next day it wouldn't. And consumers have a
16 hard time understanding how the product they
17 bought yesterday was certified, and the
18 product they buy today doesn't have
19 certification, because we didn't make the
20 alternate sources of fish meal and fish oil
21 available through research over the next seven
22 to ten years, whatever it works out to be.

1 That's very confusing to people in the
2 marketplace, I think. It would be to me.

3 CHAIR DELGADO: Okay.

4 MR. MATTHEWS: I would say that
5 it's probably no more confusing than when we
6 went from accepted standards worldwide to the
7 NOP. And under the NOP and the Organic Foods
8 Product Action of 1990, if you want to sell
9 label or represent in the United States as
10 organic, it has to be produced to our
11 standards. So I really am having problems
12 with producing to a different organic
13 standard, and then representing it, selling it
14 in the United States as an organic feed for
15 fish.

16 I would, if I were on the outside,
17 I would be arguing well, why can't I use
18 Germany's feed for my dairy cows? Why can't
19 I use Chile's feed for my hogs? Why can't I
20 use New Zealand's feed for my lambs? But even
21 if it is at a supplement level, I mean, it's
22 still being represented as an agricultural

1 product, so why can't I use some other
2 country's agricultural product in the
3 production of any other livestock, other than
4 an aquatic species?

5 I don't -- I'm not sure that the
6 attorneys would tell us that that is legal.
7 And I'm also suspicious that Mr. Harvey would
8 file a second lawsuit on the feeding of non-
9 organic feed to U.S. organic animals.

10 CHAIR DELGADO: Very good. Thank
11 you. The Program will respond later, it's my
12 understanding, so we'll move on to the next
13 question. We have Kevin, followed by Katrina.

14 MEMBER ENGELBERT: I'd like to try
15 to address a few of the points that are made.
16 The first is, with the feed from a foreign
17 source, this is simply trying to bring in an
18 oil that's not available in the current
19 system. We were told that a step-down system
20 would not stand up to lawyer scrutiny, that
21 wild caught would also not stand up to -- wild
22 caught fish oil and fish meal would not stand

1 up to the scrutiny of all the regulatory
2 bodies that the measure would have to be
3 approved by. So this is what we've come up
4 with.

5 And as far as the feeding for
6 dairy, cattle, or any other product, this
7 market is already established in the United
8 States, and those feeds would have to meet
9 USDA NOP program requirements. If it did, and
10 somebody thought it was cost-effective to
11 import it from a foreign country, they could.
12 But right now, we don't have those standards,
13 and this was the only thing that we could come
14 up with that would allow that to take place.

15 CHAIR DELGADO: Right. Katrina.

16 SECRETARY HEINZE: This is a
17 complicated issue, so I'm trying to understand
18 it in my simple mind. This really is for fish
19 who are piscivorous. Is that right? And as I
20 understand it, what you're trying to do is
21 find a way to kick-start that industry. And
22 so you've looked at a couple of different

1 options, wild caught was one, this foreign is
2 another, the step-down is another. And what
3 you're struggling with is, which one will pass
4 regulatory scrutiny. Am I getting it right?

5 CHAIR DELGADO: Kevin, you want to
6 respond?

7 MEMBER ENGELBERT: Yes. We've been
8 told that the foreign certified organic, they
9 don't know. Everything else we've been told
10 won't pass the scrutiny. And the one mistake
11 we've made with our recommendation we need to
12 add to, and Hugh will read it off, is under
13 (A), we assumed that everything else would
14 have to meet our standards. And we need to be
15 specific about that, and add in this one
16 section to (A) to make it perfectly clear that
17 everything else about this foreign certified
18 has to meet our standards as far as substances
19 or prohibited materials, or anything like
20 that.

21 CHAIR DELGADO: Okay. Katrina, you
22 had a question?

1 SECRETARY HEINZE: Well, I was just
2 going to follow-up with, it does seem then
3 that an NOP response would be helpful to get
4 you to how do we do that kick-start in the way
5 that's right.

6 CHAIR DELGADO: I believe that
7 Barbara wants to comment, please, and we'll
8 follow with Julie.

9 MS. ROBINSON: I just would like to
10 say, the Program has never said that - at
11 least I hope we have never conveyed to you
12 that there can be no wild caught standards.
13 We have a law that says that there can be wild
14 caught standards, and the Program has
15 certainly never issued any kind of statement
16 that said there can be no wild caught
17 standards. And if you somehow have gotten
18 that impression, that's a mistake.

19 DR. KARREMAN: Well, I apologize,
20 but we have been under the impression, maybe
21 from various other stakeholders or whatever,
22 that that just won't fly.

1 MS. ROBINSON: Well, you know -

2 DR. KARREMAN: And I've always
3 wondered about it.

4 MS. ROBINSON: We've heard that
5 some consumers may not want wild caught
6 standards, but USDA has never made that
7 statement.

8 DR. KARREMAN: Yes. You know, and
9 some of us have wondered about it, because it
10 is sitting there in OFPA that it can be
11 considered. But then, apparently, to make it
12 into regulation, we've been under the
13 impression that that just won't fly.

14 MR. MATTHEWS: Well, it's allowed
15 by -

16 CHAIR DELGADO: Please wait to be
17 recognized, please. Mr. Matthews.

18 MR. MATTHEWS: It's allowed by
19 statute, and we've had a work plan on the book
20 for years. In fact, it was just republished
21 for wild caught, and that stimulated a lot of
22 phone calls to me as to what's happening on

1 it. Well, the bottom line is nothing is
2 happening on it. It's just that we renewed
3 the work plan, and so basically a previous
4 board said no. There's a work plan that's out
5 there because after the board said no, the
6 statute was amended. So if this board wanted
7 to move forward with a different decision from
8 what the previous board did, well, then that's
9 perfectly within their right.

10 Right now, there's no wild caught
11 because there's been no recommendation by the
12 board to develop standards for it. But that
13 doesn't mean there couldn't be, so we've never
14 said you cannot do it. Only the board has
15 said you cannot do it.

16 CHAIR DELGADO: All right. Julie.

17 MEMBER WEISMAN: Yes. This may be
18 opening up a different can of worms, but what
19 is the downside of setting the standard that
20 for the moment, only herbivorous fish will
21 meet? And then those fish are being produced
22 as certified organic at some later date, there

1 will be a certified feed source available that
2 will then allow piscivorus species to then be
3 certified organic.

4 CHAIR DELGADO: Dan, do you want to
5 address that point?

6 MEMBER GIACOMINI: I believe
7 there's already enough of a recommend passed
8 that would accomplish that, once it makes it
9 through rule making, in the practical rule
10 making side. The second part of what you
11 asked there is the fact that you are what you
12 eat, to a certain extent. And those fish do
13 not eat the diet that raises their oil levels
14 high enough to achieve the kind of numbers
15 that they're going to need, that they're
16 looking at to be needing to feed the
17 piscivorus.

18 CHAIR DELGADO: Any other comments?
19 Yes, Tracy.

20 MEMBER MIEDEMA: This is just a
21 little bitty one, but we refer to these
22 trimmings as imported certified organic, and

1 I think that's a point of confusion, because
2 that makes it sounds like it's USDA certified
3 organic, and happens to be imported, and so
4 just as a clarification for language, if we
5 said organic non-USDA certified.

6 DR. KARREMAN: Sure. We can figure
7 that in.

8 CHAIR DELGADO: Okay. Joe,
9 followed by Jennifer.

10 MEMBER SMILLIE: Well, this is itty
11 bitty to the itty bitty. It shouldn't even be
12 foreign, it should be private standards.
13 That's the word you want to use.

14 DR. KARREMAN: Okay.

15 MEMBER SMILLIE: Private standards.

16 DR. KARREMAN: Very good.

17 CHAIR DELGADO: Jennifer. Any
18 other comments, questions?

19 DR. KARREMAN: I think, George, did
20 you have -- George Lockwood, did you want to
21 say something?

22 CHAIR DELGADO: Mr. Lockwood, can

1 you -- Dr. Lockwood, please approach the
2 podium and address your -- do you have a
3 specific question, Hugh, or do you want to
4 allow -

5 DR. KARREMAN: I just thought I'd
6 let Mr. Lockwood have some input here, since
7 they put so much time into this, and he's head
8 of the Aquaculture Working Group.

9 CHAIR DELGADO: Please do, sir.

10 MR. LOCKWOOD: Thank you, Mr.
11 Chairman. I'm George Lockwood, Chair of the
12 Aquaculture Working Group, your Technical
13 Advisory Panel.

14 We have a number of concerns about
15 the proposal, and hopefully, maybe some
16 comments I can make will help clarify some of
17 your thinking. We are concerned about
18 implementation under 2105(b), it's never been
19 done. When you determine an equivalent
20 standard, are you going to have to go and
21 determine that all of Natureland's standards
22 are equivalent, or just that having to do with

1 fish meal?

2 We also have concerns about whether
3 the fish that will be grown for fish meal and
4 oil will be grown to equivalent U.S.
5 standards. We have proposed to the Chair of
6 the Livestock Committee to insert that
7 actually you would grow to two standards, the
8 U.S. standard, and to the foreign certified
9 that you're going to import.

10 If, in fact, we're able to get
11 through the implementation and equivalency
12 issues, we see that there probably will be a
13 source of meal coming from very large sloppier
14 production around the world. There's already
15 one grower that is seriously considering this.
16 Sourcing oil is a major concern, because the
17 only oil, the only source of oil is the ocean,
18 practically speaking. There are no land crops
19 that produce DHA and EPA which are the Omega-3
20 fatty acids that are so important.

21 I would like to give you an example
22 here of salmon, for instance, how this would

1 apply to salmon aquaculture. Salmon is the
2 third or fourth most consumed fish species in
3 the American diet. The average American eats
4 two to two and a half pounds per capita. It's
5 a very high oil fish in nature and in culture.
6 It requires somewhere between 10 and 20
7 percent oil for a healthy diet.

8 In the regulations that you've
9 already adopted in your March 2007 meeting,
10 you adopted under 205.252(j) the prescription
11 of feeding fish the same, from the same genus.
12 In other words, salmon can't be used to feed
13 salmon. That means we would have to turn to
14 some other species for oil. The only other
15 species that will undoubtedly be grown, at
16 least initially, in any quantities are shrimp,
17 tilapia, and catfish. They are very low oil
18 producing fish. We're talking about one, two,
19 or three percent. So if we take the viscera
20 from catfish, for instance, that only has one
21 percent oil in it, we're not going to have
22 much oil in order to develop a salmon

1 industry. It just won't work.

2 Another way of doing this would be
3 to grow anchovies, for instance, for example,
4 for the sole purpose of feeding to U.S.
5 aquaculture, salmon, for instance. In other
6 words, what we would do is take wild oil in
7 Europe, grow anchovies, extract the oil and
8 send it to the United States to be used as is
9 proposed. We are, in essence, laundering the
10 oil. That's all that we would be doing. And
11 that just doesn't make sense to me.

12 As I said yesterday, upon our very
13 careful review, and from a practical point, we
14 just simply don't see how this is going to
15 work. We have made recommendations, and we
16 strongly urge that you seriously consider
17 restoring to what we had proposed, and you
18 acted on on March 27th of last year, our
19 Paragraphs B, C, D, and I. And we suggest
20 that you add Paragraph Q, which is from the
21 Livestock Committee report, that would read
22 something like the following. And I've made

1 an amendment, and I'll tell you when I get to
2 it.

3 "Fish meal and oil from carcasses,
4 viscera, and trimmings from the processing of
5 foreign certified organic aquatic animals" -
6 and I would add - "as provided under 2107(b),
7 and otherwise produced in compliance with this
8 section, will be considered organic for use in
9 fish feed only."

10 So that, basically, is what we
11 would recommend, that you support our
12 recommendations that we labored over very
13 hard, just as you have been doing. We think
14 the Act fully supports this.

15 For instance, in 2103.11, the Act
16 clearly intends for fish to qualify as
17 organic. In Section 2114(f), provides for the
18 harvesting of wild crops. Section 2107(c)
19 allows wild fish to be organic. 2103.21
20 provides for products from naturally occurring
21 biological processes. 2110(f) allows the use
22 of supplements, or at least acknowledges the

1 use of supplements.

2 In conclusion, the Act states the
3 intent for organic seafood, and provides the
4 legal structure. To effectively eliminate
5 fish oil, there will be no organic seafood.
6 In the absence of a firm standard, foreign
7 grown, foreign certified, foreign labeled
8 salmon will continue to enjoy their harvest in
9 the U.S. market for organic salmon.

10 Again, we urge the restoring of the
11 paragraphs in our original proposal, which,
12 incidentally, are in our public comment as
13 Appendix A, and the ones that were withheld,
14 they weren't deleted, they were withheld for
15 further consideration, are italicized. Thank
16 you, Mr. Chairman. Thank you.

17 CHAIR DELGADO: Any questions for
18 George? Hugh? Any questions from the Board
19 for George? Thank you very much.

20 MR. LOCKWOOD: Thank you.

21 CHAIR DELGADO: Okay. Any
22 questions for the members of the Livestock

1 Committee on the part of the Board? Very
2 good. Well, it seems to me that Chairman of
3 the Livestock Committee, you probably need to
4 do some reword, some rethinking.

5 DR. KARREMAN: Major, big time,
6 probably.

7 CHAIR DELGADO: Very good. And
8 that concludes your presentation. Do we have
9 anything else?

10 DR. KARREMAN: That does. The only
11 other thing was that discussion item on net
12 pens, and we're working still with the
13 Aquaculture Working Group on the main -- well,
14 two of the issues are siting the pens,
15 potentially. And, also, the manure nutrient
16 effluent from those pens, and so we've asked
17 the AWJ to be available to answer questions
18 regarding that from the Livestock Committee in
19 the coming months, and hopefully come up with
20 a few alternatives to each of those questions
21 that we can choose from in the public sphere.

22 CHAIR DELGADO: Very good. All

1 right. Thank you, again, and I look forward
2 to having those changes or modification
3 suggestions from the group.

4 We move on next to the Handling
5 Committee, with Mrs. Weisman.

6 MEMBER WEISMAN: Good afternoon.
7 Wow! Congratulations, Rigo, we're still on
8 schedule.

9 CHAIR DELGADO: We're on schedule,
10 yes.

11 MEMBER WEISMAN: I hope I'm not
12 going to mess it up, but there's a good chance
13 that I will.

14 (Laughter.)

15 MEMBER WEISMAN: We have on our
16 agenda two classes of things. We have
17 petition materials, and we have some sunset
18 items. I think the first thing that we have
19 on our agenda are the petition materials.

20 There were originally posted on the
21 agenda two items for 605, which have both been
22 deferred, one because we felt we did not have

1 sufficient time to -- in the case of calcium
2 derived with seaweed, we did not feel we had
3 enough time to adequately tease-out the
4 issues. There was also sodium chloride
5 acidified, and that was a late petition that
6 did not really have adequate time for the TAP
7 review that we felt was required, and for that
8 reason it was deferred.

9 For 606, out of the 20 materials
10 that are listed on the -- that are indicated
11 on the agenda, 16 -- four were deferred, and
12 actually one also was withdrawn in the weeks
13 prior to this meeting, so I think that means
14 that we have 15 petitions to present today.

15 Now, before we actually present the
16 petitions, I did want to make a couple p some
17 comments, some sort of opening comments about
18 606, in general, to attempt to address some of
19 the comments that we have received, both
20 written ahead of the meeting, and so far
21 during our public meeting.

22 The first thing that I wanted to

1 clarify, from our point of view - no, not just
2 from our point of view - I want to clarify,
3 the Handling Committee and the NOSB in
4 considering 606 petitions, is not deciding
5 commercial availability. That is the job of
6 the certifier. That's number one.

7 The second thing I wanted to
8 clarify is that when materials are deemed
9 appropriate for 606 by the Handling Committee,
10 they will be listed based on the Board's
11 finding, if either of two situations are found
12 to exist; that it is not available as organic,
13 period. Now that doesn't mean, necessarily,
14 that the raw agricultural product may not be
15 grown, but it's not available in the form
16 that's needed for a processed product. The
17 second is fragility of supply, so either it's
18 not available, or the supply is fragile. One
19 of those two situations has been found to
20 exist.

21 The second issue that has been
22 coming up very consistently is the question

1 about whether listing on 606 is an incentive
2 or a barrier to the stimulation of the
3 development of new organic materials to
4 replace the ones that are being listed on 606.
5 And the organic community, I think we have
6 seen, is sharply, and I think pretty evenly
7 divided on this issue.

8 I would like to offer a couple of
9 thoughts on this. As with many things in
10 life, the answer likely is not one or the
11 other. Both may be true, and the answer may
12 differ either case-by-case. I do appreciate
13 the comments that express concern over the
14 growth of -- the increase in items on the
15 National List, and the despair that it's only
16 going to get bigger, and it's never going to
17 get smaller. And I guess I want to remind
18 everyone that even though it feels like we've
19 been at this forever, because I think for many
20 people in the room, it's been most of your
21 adult lives, that the industry and the
22 regulation in the world of federal regulations

1 is very young. It's only been in effect for
2 five years. And I believe that the -- first
3 of all, as new products begin to understand
4 the regulation and want to participate, it is
5 natural that there are going to be materials
6 that are seen as needed, and petitioned on to
7 the list.

8 But I also think that we are going
9 to see very soon -- I think there are already
10 -- we are already hearing about petitions that
11 are being written and formed for specific
12 items. I'm not talking theoretically here.
13 I mean, there are specific items that we are
14 going to see petitioned off the list. And I
15 know that it seems like it's taking a long
16 time, but that doesn't mean that that is not
17 going to start happening with more frequency,
18 I believe.

19 The other -- there have been calls
20 in different ways for a moratorium for listing
21 any new items for a couple of reasons. One
22 that was mentioned was a concern about --

1 well, one was a suggestion that only raw
2 agricultural products should be petitioned on
3 to 606. We can certainly fully discuss all of
4 these. I don't think that that's really a
5 practical approach.

6 The other is that we refrain from
7 listing items until we have clarification on
8 what, besides the agricultural ingredient, is
9 also included in a formulated product, in a
10 multi-ingredient product. And I have two
11 thoughts about that. One is that, I was very,
12 very interested in the suggestion that Richard
13 Matthews made earlier today, when we were
14 discussing annotations on livestock. And I
15 believe that something like that in the
16 heading of 606 might help clarify what can and
17 cannot be included in a multi-ingredient
18 product on 606.

19 The second note I wanted to make is
20 that of the 16 petition, of the live petitions
21 as of today for 606, only six are going to be
22 put forward as recommendations for listing by

1 the Handling Committee, and none of them are
2 multi-ingredient products. So I believe that
3 -- I want to allay people's concerns about the
4 actual petitions that we may be considering
5 for listing at this meeting.

6 I think that's probably enough
7 opening comment. And I can move into actually
8 looking at petitions, unless there are
9 questions.

10 CHAIR DELGADO: Any questions for
11 Julie? None. Please proceed.

12 MEMBER WEISMAN: Okay. I think the
13 -- we have a list in our meeting books. It's
14 in Alphabetical order. We are -- the first
15 two items on that list are the alcohols, the
16 fortified cooking wines. And I'm actually
17 asking different members of the Handling
18 Committee to present different of these
19 petitions because there's so many of them, and
20 you'll get really tired of hearing my voice.

21 The other note I wanted to say is
22 that there was a whole group of petitions that

1 were submitted by one petitioner. They were
2 somewhat boilerplate in their presentation,
3 and they were so similar, and we pretty much,
4 I think, are treating every single -- I mean,
5 we had similar findings on all of them,
6 without exception, pretty much, so the bulk of
7 those are going to be presented by Katrina and
8 Steve, with a few stragglers. So I think
9 we'll proceed with Tracy on the cooking wines.

10 CHAIR DELGADO: Tracy.

11 MEMBER MIEDEMA: Thank you, Mr.
12 Chair. Thank you, Julie.

13 I'd like to actually start with the
14 second one. The first two petitions were
15 submitted by the same petitioner, and they
16 included a bunch of their evidence, lack of
17 supply in the fortified cooking wine sherry
18 that supports their petition for Marsala, so
19 I thought it made sense to start with that
20 one.

21 So we recommended unanimously for
22 the inclusion of fortified cooking wine sherry

1 to 205.606 to the National List. We felt that
2 it did satisfy in our evaluation criteria,
3 one, two, and four, and number three was N/A,
4 not applicable. Our Committee vote was six
5 yes, zero no. And just a little bit about the
6 petition.

7 This substance does have unique
8 flavor and fragrance characteristics that are
9 necessary for the prepared dishes that the
10 petitioner makes in their prepared foods. And
11 they were able to demonstrate that it had
12 these unique properties. They also did an
13 excellent job of thoroughly listing fortified
14 wine producers that didn't have any organic
15 available, and organic wine producers that
16 didn't have any fortified wine available. So
17 it was quite an exhaustive list of both of
18 these types of producers. And just sort of as
19 a check, we triangulate, use various means to
20 check availability. Just doing Google
21 searches, it was interesting. The only
22 organic sherry I could find when I put quotes

1 around those two words, you'd think you've get
2 15,000 hits or something, just because it's a
3 pretty typical phrase, the only hits I could
4 find was the petitioner begging the industry
5 to please produce some, so they seem to really
6 be out there doing their due diligence,
7 looking for someone to produce these two types
8 of fortified wines, so opportunity out there.
9 Hopefully, this would be one of those
10 situations that we hope happens, where 606 is
11 seen as an opportunity, and spurs an organic
12 version to be made.

13 The petition for Marsala is almost
14 identical, if I can move on to that one. The
15 only difference is just the unique flavor,
16 profile, and characteristics, some very slight
17 differences in the way the wine is produced.
18 And they use their, like I said, their
19 evidence of going to wine producers and not
20 being able to find any organic versions, going
21 to organic wine producers and not being able
22 to find those two varietals, as evidence. But

1 they only put that evidence in one petition,
2 sherry. In their Marsala petition, they
3 referred to their sherry petition, which was -
4 - procedurally, it would have been cleaner for
5 the petitioner to have went ahead and just
6 repeated that research, so it wasn't siloed
7 off. One petition referring to another just
8 isn't procedurally accurate. But we, as a
9 Committee, agreed that it was sound. And on
10 Marsala, we voted unanimously 6-0 to include
11 fortified cooking wine Marsala on 205.606.
12 Any questions?

13 CHAIR DELGADO: Any questions for
14 these two products? Jeff.

15 VICE CHAIR MOYER: Thank you, Mr.
16 Chairman. My question isn't, necessarily,
17 just for you, Tracy, but for the Handling
18 Committee, in general. And not only specific
19 for the cooking wines, because my question
20 pertains to all of the products that I see
21 listed in front of me. When you look at the
22 list of criteria for every one of them, we

1 have that it meets the criteria for impact on
2 humans and environment; yet, this is
3 conventionally produced agricultural products,
4 and so it leads me to wonder if there's no
5 human or environmental impact from
6 conventionally farmed products, why are we
7 here? It would seem like just by definition,
8 the fact that they're conventionally produced
9 in the minds of an organic person, it doesn't
10 meet those standards.

11 Whether we vote it on to the list
12 or not, in my opinion, it fails that criteria.
13 I'm not saying that's grounds to list or
14 unlist it, I'm just saying I have a problem
15 with that.

16 CHAIR DELGADO: Response from Julie
17 Weisman.

18 MEMBER WEISMAN: Yes. Well, I
19 think the -- for instance, some of the
20 questions -- I do think that there is some
21 cleaning up that has to be done, that some of
22 these have been -- I mean, I do agree that has

1 to be looked at, but I also would like to
2 point out that some of the questions, there
3 are certain questions on these Category 1, 2,
4 and 3 of the evaluation criteria checklists
5 where the notation refers to 205.600(b) and
6 various numbers under (b). And those are
7 questions that are really meant only for
8 synthetic substances. Okay?

9 Some of these questions are meant
10 for synthetic and non-synthetic substances,
11 and I think that where something that would be
12 an agricultural product that's not organic
13 needs a little clarification where that fits
14 in. And I think that they've not been
15 considered exactly the same on each petition,
16 and that may, in fact, be something that does
17 have to be cleaned up.

18 CHAIR DELGADO: Okay. Tracy.

19 MEMBER MIEDEMA: I would agree with
20 Julie, and also add that when you look through
21 that list of questions, things like is there
22 a toxic or adverse action of the material or

1 its breakdown products? We're talking about
2 what happens when that wine is in the
3 environment, not what happens during its whole
4 life span of the grapes being grown. And
5 since 606 is non-organic, it is a given that
6 we're potentially talking about conventional
7 agricultural practices, so I think it's
8 embedded in that we're talking about
9 conventional.

10 CHAIR DELGADO: That is a key. I
11 just want to clarify 606 is the allowance of
12 non-organic products, agricultural products if
13 there are no organic available, and that's
14 sufficient for now. Jennifer.

15 MEMBER HALL: In the evaluation, do
16 we consider the percentage of the composition
17 of the product that the material we're
18 allowing is? Is the Marsala or sherry 60
19 percent of -

20 MEMBER WEISMAN: This is only for
21 the -

22 CHAIR DELGADO: Julie.

1 MEMBER WEISMAN: I didn't wait.
2 Sorry for jumping the gun, Rigo. It's only 5
3 percent of a finished product, so the Marsala
4 wine at most can be 4.9 percent or something
5 like that.

6 CHAIR DELGADO: Tracy.

7 MEMBER MIEDEMA: And the last thing
8 I'll throw in here is that the petitioner
9 stated very clearly this was for a Chicken
10 Marsala product, and it really made me bristle
11 that this is non-organic Marsala in a product
12 calling itself Chicken Marsala. And my
13 colleagues on the Committee reminded me that
14 that's an enforcement issue, not within the
15 purview of this Board or our Committee.
16 However, I was really impressed by the way the
17 petitioner handles this, and they on their own
18 website say we're looking for organic Marsala
19 wine. We want everybody to know we're not
20 trying to get away with something, and so it
21 was very -- it was handled really well.

22 CHAIR DELGADO: Any other questions

1 on those two products? Thank you. Back to
2 you, Mrs. Weisman.

3 MEMBER WEISMAN: On our list, which
4 is alphabetical, the next four items that I'm
5 just going to mention briefly are deferred.
6 They are the two algae that I mentioned
7 earlier today, also black pepper extract and
8 bucholt powder, those four items have been
9 deferred.

10 I'm going to ask my colleague, Dr.
11 Heinze, I like saying doctor, to present a
12 group of petitions that were submitted by one
13 petitioner.

14 CHAIR DELGADO: Madam Secretary.

15 SECRETARY HEINZE: Okay. Thank you
16 for the Madam.

17 Okay. As Julie said, a number of
18 materials petitioned for listing on 205.606
19 were submitted by the same petitioner, so I
20 will be presenting five of them, then the rest
21 will come. So the five materials that I am
22 presenting are Chinese thistle daisy extract,

1 peony root extract, polygala root extract,
2 polygonum root extract, and tangerine peel
3 extract. On a personal note, I do thank the
4 petitioner for the education I got reviewing
5 these.

6 None of these - so kind of the top
7 line, first - none of these materials are
8 being recommended by the Handling Committee
9 for listing because of not meeting the
10 criteria for Category 4, so that's the
11 commercial supply is fragile or potentially
12 unavailable. We did not feel that the
13 petitioner made that case.

14 So a little bit of background.
15 Yes, Kevin?

16 CHAIR DELGADO: Kevin.

17 MEMBER ENGELBERT: Yes. Katrina,
18 could you please repeat what the five were
19 that you were going -

20 SECRETARY HEINZE: I'd be happy to.

21 MEMBER ENGELBERT: Thank you. I
22 was trying to find that page.

1 SECRETARY HEINZE: Okay. Chinese
2 thistle daisy extract, peony root extract,
3 polygala root extract, polygonum root extract,
4 and tangerine peel extract. See, I even made
5 Hugh chuckle. All my co-workers chuckled,
6 too, while I was working on this.

7 Okay. Are we ready?

8 CHAIR DELGADO: Please continue.

9 SECRETARY HEINZE: So a little bit
10 of background on these materials. In all
11 cases, these ingredients are intended by the
12 petitioner to be used as nutraceutical
13 ingredients in dietary supplements and foods.
14 And then, again, in all cases, a little
15 background on how they're produced. The raw
16 agricultural material, so for example the
17 Chinese thistle daisy root, is harvested,
18 dried, shipped to a processor. It's milled,
19 then extracted with water and ethanol. The
20 extracted liquid is concentrated into
21 essential oils. That will be important in a
22 minute, so it becomes an essential oil. And

1 then it's standardized, mixed with organic -
2 I can't say this word again - astragalus root
3 carrier, spray dried and ground into a powder.
4 So they're all processed the same way.

5 Okay. So now we get to the heart
6 of the matter. In all cases, the
7 justification by the petitioner for the
8 organic not being available was the same.
9 What they said, and this is a paraphrase, was
10 that the sourcing department was continuously
11 searching for the organic forms, but had been
12 unable to find them. No information was
13 provided to explain why the organic ingredient
14 could not be available, so they just said
15 we're looking for them, we can't find them,
16 we're still looking. They didn't really
17 address this fragility, like what were the
18 underlying factors that could have made the
19 organic not available, which the Handling
20 Committee felt very strongly was necessary
21 information.

22 So, as an example, I, and probably

1 many of you can buy organic tangerines at my
2 local co-op, so what are the technical hurdles
3 that would prevent that peel from the
4 tangerine being used to produce organic
5 tangerine peel extract? And the petition
6 didn't address that at all, which we felt was
7 a problem.

8 Finally, in three cases, the
9 Chinese thistle daisy, the peony root, and the
10 polygala root, fairly simple internet search
11 found organic forms of these materials. Now,
12 not in this exact form, but either as an
13 essential oil, or as the raw agricultural
14 material. So, again, just because you can
15 find it doesn't mean that it's in the right
16 form, quality, or quantity, but certainly, we
17 would have liked the petitioner to address
18 that, and help us understand, again, what the
19 technical hurdles were.

20 So to wrap that up, in each case,
21 these materials were recommended for listing
22 on 205.606 consistent with our past practice.

1 So, remember, motion to list, and then in each
2 case, the Handling Committee vote result was
3 in the negative resulting that we're not
4 recommending them for listing. Did you follow
5 that? Okay. So I am supposed to give you the
6 vote results, so by material, Chinese thistle
7 daisy extract, zero yeses, six nos; peony
8 root, zero yeses, five nos, one absent;
9 polygala root extract, zero yes, five no, one
10 absent; polygonum root extract, one yes, four
11 nos, one absent; tangerine peel extract, zero
12 yes, six no.

13 CHAIR DELGADO: Any questions on
14 these materials? Hugh.

15 DR. KARREMAN: Just a general
16 question. Did I understand you right, in that
17 they told you the process where they make the
18 extract, so that they're buying the raw
19 material and making the extract, or what?

20 SECRETARY HEINZE: I don't believe
21 that's true. They just explained how it's
22 made. I believe they're looking for the -

1 DR. KARREMAN: The final product.

2 SECRETARY HEINZE: The final
3 product. From the petition, that would be how
4 I read the petition.

5 CHAIR DELGADO: Any other
6 questions? Okay. Thank you. Back to you.

7 MEMBER WEISMAN: Okay. Now I'm
8 going to turn the mic over to Steve DeMuri,
9 who has a group of similar petitions.

10 MEMBER DeMURI: Thank you, Julie.
11 These were all petitioned by the same
12 petitioner that Katrina just had for her five,
13 and these five are as follows; Codonopsis root
14 extract, Jujube fruit extract, ligusticum root
15 extract, Poria fungus extract, and Rehmannia
16 root extract.

17 MEMBER WEISMAN: Can you do that
18 again, slower? Thanks.

19 MEMBER DeMURI: Codonopsis root
20 extract, Jujube fruit extract, ligusticum root
21 extract, Poria fungus extract, and Rehmannia
22 root extract. Everybody got those?

1 Just like the items that Katrina
2 had, these ingredients were also intended to
3 be used as nutraceutical ingredients in
4 dietary supplements and foods. So this
5 petitioner petitioned numerous items all to be
6 used for the same end-use. And like Katrina's
7 five, and these as well, the raw agricultural
8 materials harvested, dried, shipped to a
9 processor where it is milled, and then
10 extracted with water and ethanol. The
11 extracted liquid is concentrated into
12 essential oils standardized to desired
13 concentration, mixed with organic astragalus
14 root carrier, spray dried, and then ground
15 into a powder, so that's the process they
16 supplied to us.

17 And, again, in all cases, the
18 statements concerning organic non-availability
19 was the same, that the sourcing department was
20 looking for the items, but just could not find
21 them. But, again, like the previous five,
22 there is no information provided as to explain

1 why the organic ingredient cannot be available
2 in organic form. In all five of these cases
3 that I had, internet search, and also some
4 follow-up phone calls revealed that there were
5 organic forms of the raw agricultural
6 materials available in all cases, but the
7 petitions did not address the reasons or
8 conditions that made their specific process
9 forms unavailable. So for those reasons, all
10 five of these materials failed Category 4 of
11 the criteria.

12 In each case, the Handling
13 Committee vote resulted in a negative for
14 listing. And the vote results were as
15 follows: for Codonopsis root extract, zero
16 yes, six no, no absent, no abstentions; for
17 Jujube fruit, zero yes, five nos, one absent,
18 zero abstentions; for ligusticum root extract,
19 zero yes, five no, one absent, zero
20 abstentions; for Poria fungus, zero yes, four
21 no, one absent, one abstention; and for
22 Rehmannia root extract, zero yes, five no, one

1 absent. So that finishes up those five
2 petitions.

3 There's one other one that Julie
4 mentioned that I had on my list. That was oat
5 bran concentrate that does show up in your
6 list. That's the one that was withdrawn just
7 a few weeks ago, so we do not plan to take any
8 action on that. And that's it. I'll turn it
9 back over to Julie, unless there's any
10 questions.

11 CHAIR DELGADO: Are there any
12 questions on these materials? Okay. Thank
13 you. Back to you, Julie.

14 MEMBER WEISMAN: Okay. There's
15 about two more materials that were part of
16 this group from this petitioner, and Gerry is
17 going to present one of them.

18 CHAIR DELGADO: Gerry.

19 MEMBER DAVIS: Thank you. The
20 material petition that I went over was Camu-
21 camu powdered extract, and it is from a berry
22 produced in the Amazon, generally, South

1 America. And it's an extract slightly
2 different than the ones mentioned. It's
3 produced just from juicing and straining the
4 berries, which is then concentrated and spray
5 dried along with organic cassava starch.

6 The petitioner states that the
7 extract is produced from juicing and straining
8 these berries, and that it has -- the Camu
9 berry has never been available as organic.
10 The berry is harvested in remote wilderness
11 areas of the Amazon flood plain over vast
12 areas which have not been practical to manage
13 under an organic system plan. Being that none
14 of us were familiar with this type of wild
15 harvest situation in South America, one of our
16 members suggested I contact the Instituto
17 Biodinamico, IBD, in Brazil. And in
18 contacting them, they do certify wild
19 harvested Camu-camu as organic, but when asked
20 to check on it further, what they certify is
21 organic Camu-camu as an ingredient of a liquid
22 juice product, not as powdered extract form.

1 And they report that there is no domestic U.S.
2 organically certified product available at
3 this time. But since the petitioner did not
4 really address why it's not -- that this
5 organically produced Camu-camu from Brazil,
6 why it can't be used, they didn't even talk
7 about at all, they said it was not available.
8 It never has been grown, which didn't seem to
9 be accurate, versus what we found from IBD, so
10 the Committee voted that Category 4 criteria
11 was not met because the petition did not
12 address why organic Camu-camu produced in
13 Brazil cannot be used. So the vote was zero
14 yes, five no, one abstention to not include it
15 on the National List. Any questions?

16 CHAIR DELGADO: Questions on this
17 material? None. Thank you. Back to you,
18 Julie.

19 MEMBER WEISMAN: I would like to
20 ask Joe Smillie to present three materials.

21 MEMBER SMILLIE: Val, we're going
22 to do caramel first, then Kombu, then the

1 poster child okra.

2 When we were dividing up these,
3 just a little aside on this group. When we
4 were dividing up these materials, those all
5 had big names and looked hard, and so I
6 thought I took the easy ones. Boy, was I
7 wrong. But I'd also like to thank our Chair,
8 who hearing the squeals of pain from the
9 Handling Committee jumped in and brought in
10 the calvary, and Gerry kindly, and Tracy
11 joined the Handling Committee to help out with
12 the materials. So once again, the group work
13 and our wonderful Chair, we got through these
14 materials.

15 So starting off with caramel color,
16 it was a really interesting petition because
17 the petition for the conventional caramel
18 colors was actually petitioned by one of the
19 manufacturers of organic caramel color. And
20 that, right away, you don't usually see that,
21 but when we got into the petition, and, again,
22 going through Category 1 and 2, basically, in

1 Category 2 is the substance essential for
2 organic production?

3 Well, people in the U.S., at least,
4 want their colas dark colored, so whether
5 that's essential or not, I guess the
6 marketplace says it is. I don't particularly
7 feel it to be essential, but not being a cola
8 drinker, I don't have that problem. But,
9 nonetheless, we quickly got into the fact that
10 various different manufacturing -- it's
11 Category 2, number 5, is there an organic
12 substitute? And I thought yes, there's
13 organic caramel color available. There's at
14 least two companies producing it. But when we
15 got into it deeper, and the petitioner did an
16 excellent job explaining it all, every
17 different manufacturing process, and every
18 different manufacturer has various different
19 constraints, mostly to do with pH, and
20 viscosity, and oh, boy. It's food science
21 world out there on what can be used, and what
22 can't be used. And the petitioner had nothing

1 to hide. I mean, they produce organic caramel
2 color, and they're saying we can't produce
3 this color for all the needs of the organic
4 manufacturing sector.

5 So, basically, the petitioner
6 claimed that these forms were needed. We
7 checked into the other major manufacturer that
8 we knew, just to see, check the voracity of
9 the petitioner's comments. And sure enough,
10 they backed it up. They said yes, that's the
11 case. And there's a lot of manufacturers in
12 this room that know more about this than I do,
13 but all caramel colors are not created equal.

14 So we looked at it, and we were
15 open to the idea. But when it got right down
16 to it, the main barrier to the production of
17 caramel color for different uses was it was
18 cost-prohibitive. That ended up, it wasn't
19 constrained by supply, because caramel color
20 is nothing but burnt sugar, basically, more or
21 less in layman's terms, so it wasn't
22 constricted by supply or civil unrest in the

1 sugar world, or any of the usual things. It
2 was cost-prohibitive. And on that basis, we
3 voted. Again, a motion was made to list it.
4 The vote was zero yes, six no, no absent, and
5 no abstentions.

6 We felt that cost of production was
7 not a significant reason to add it to 606.
8 Okay. Thank you.

9 CHAIR DELGADO: Any questions for
10 this material? None. Continue with the next
11 one, please.

12 MEMBER SMILLIE: The second one.
13 Simply enough, Kombu seaweed. Well, on the
14 surface it's simple, but technically, it would
15 Lamanaria Japonica, Lamanaria Japonica variety
16 ochotensis, Lamanaria Angustate, Lamanaria
17 Angustata variety longissima. We also had a
18 very good public comment that said you can
19 group these varieties into what's commonly
20 called Pacific Kombu, as different from
21 Atlantic so-called Kombu, which the Japanese
22 aficionados would not call Kombu, but which

1 is called Kombu in the trade, being a type of
2 Lamanaria, but not having those unique
3 qualities of Kombu that are essential for the
4 organic production of certain products.

5 So, again, is there organic
6 substitute? The answer is there are organic
7 certified seaweeds on the market, and some of
8 them even are similar to Kombu, but they don't
9 create the Kombu-like effect, which is
10 essential for certain foods.

11 The petitioner did an excellent
12 job, once again, in describing why these
13 characteristics are needed, and why the
14 current production of Kombu at this point in
15 time cannot be certified. And, again, there
16 exists for possibilities for the certification
17 of Kombu under the wild harvest regulation,
18 but for a variety of reasons, these have not
19 been attempted as yet. And that was
20 documented very well on the reasons why, and
21 I haven't got the time to go into them all.

22 It's possible in the future, but it

1 doesn't look probable, and we shall see.
2 Because, once again, as Julie said, once a
3 supply of organic Kombu is available, that
4 supplier can petition the Board to remove
5 Kombu from the list. And that is, I believe,
6 a very effective action, and I also believe,
7 and I don't think it's been mentioned yet, but
8 that action, that petition to remove takes
9 precedence in the petition queue.

10 We followed up, and talked to five
11 or six distributors of Kombu, and kelp, and
12 seaweeds, and that thing. They all verified
13 that they could not find, even though they've
14 searched themselves, for organic Kombu. There
15 was only petitioner, but many people,
16 including some who have been certifying
17 product for many, many years using Kombu in
18 the process, even they, who are well-known for
19 their diligence in finding organic
20 ingredients, simply locate organic Kombu.

21 So the case seemed clear to us that
22 it certainly met the criteria, and the vote

1 was for five yes, zero no, and one abstention.

2 CHAIR DELGADO: Okay. Any
3 questions? Can you repeat the vote, please.

4 MEMBER SMILLIE: Oh, five yes, zero
5 no, one absent, and zero abstentions.

6 CHAIR DELGADO: Very good. Any
7 questions on this material? Okay. Can you
8 please proceed with the next one.

9 MEMBER SMILLIE: Yes. I would be
10 happy to. If you believe that, I've got
11 shares to sell you and a bridge.

12 The next petition substance is
13 okra, specifically IQF frozen okra. The
14 petition was very long, and thoroughly
15 documented petition. And it basically said
16 that it's not available. There's certainly a
17 fragility of supply, but it also wasn't
18 available at this time. So the two criteria
19 for the actual consideration were both in
20 place.

21 It's an agricultural product, and
22 Jeff raised that argument that it's

1 conventionally raised, so, hence, we look at
2 Category 1, Adverse Impacts in the Humans or
3 Environment. We all agree that we're going to
4 move along on that.

5 Was it essential for organic
6 production? And the answer is yes. The word
7 "gumbo" comes from the African root, which was
8 the description of the vegetable okra. It's
9 not simply a vegetable used for its taste,
10 it's used for other properties, mucilaginous
11 properties, which is why some people love
12 gumbo, and other people can't stand it.

13 And, also, if you will humor me for
14 a while, is what's called in New Orleans,
15 filet gumbo. Well, in the winter when any
16 okra was not available to the gumbo makers,
17 they had to keep delivering gumbo, so instead
18 of okra mucilaginous agent, they used
19 sassafras leaf, and sassafras was called
20 filet. And that's where the word "filet
21 gumbo" comes from. It doesn't have okra, so
22 perhaps the organic substitute could be

1 sassafras leaf, which is probably not
2 available organically either, but real gumbo
3 lovers are not going to go for it.

4 So we're on to Category 3, is it
5 compatible with organic production? One of
6 the questions we look at, and I know all the
7 NOSB followers love this one, is the primary
8 use to recreate, improve flavors, colors,
9 textures, and things of nutra values lost in
10 processing? And the answer, no. The value of
11 this product doesn't replace something lost in
12 processing. It brings something very unique
13 to the product.

14 So then we get to Category 4. Is
15 the commercial supply of an agricultural
16 substance as organic fragile or potentially
17 unavailable? And the answer, according to the
18 petitioner, was yes, and they documented that.
19 The petition actually contained long lists of
20 the different producers and IQF facilities
21 that they had contacted in the search for this
22 product.

1 We double-checked that, and talked
2 to a lot of people. Now, we did not talk to
3 the Southeast African American Farmers Organic
4 Network, but we did talk to a lot of the
5 certification agents, especially those that do
6 a lot of work in areas that have 120 growing
7 days. Marty, don't run out of the room. And
8 they did not have qualified commercial
9 supplies of organic okra available. There
10 seemed to be a paucity of growers that were
11 growing okra commercially. It's a difficult
12 crop. It does not transport well. And
13 matching up a very scarce supply with an even
14 scarcer IQF capability was documented in the
15 petition. That's about all I can say about
16 that.

17 Quality is not particularly an
18 issue. Quality of okra, doesn't transport
19 well, and it isn't an issue in a fresh market,
20 but in the IQF market, it wasn't such an
21 issue. Quantity just did not seem to be
22 there. And, again, back to the form argument,

1 what was asked for, and I'm not sure if the
2 petition reflects this correctly, was frozen
3 IQF okra. That was what the petition was for,
4 not fresh okra. I'm not sure if we need to
5 amend that or not.

6 We talked about it, and we said --

7 I said, you know, I'm telling you guys, when
8 this goes on the list, there's going to be a
9 human cry because you can grow okra
10 organically. It's not -- it should be that
11 difficult, but the petitioner was exhaustive.
12 Our search of available IQF facilities and
13 growers, and, again, our search was not
14 globally worldwide. We did -- the petitioner
15 did list foreign sources, as well, and we did
16 our best to try and find it. And a couple of
17 members of the Handling Committee, being
18 growers also, worked through their networks,
19 so I wouldn't say it was an exhaustive search,
20 but it was a pretty good search. And based on
21 what -- the document that we received, we
22 voted five yes, zero no, zero abstentions,

1 zero abstain, and one recusal.

2 CHAIR DELGADO: Any questions on
3 okra? Yes, Julie.

4 MEMBER WEISMAN: I just want to
5 double-check. Let's see. Under Category 4,
6 Question 3, the comment. I'm wondering if
7 that was what you meant to write, or if
8 there's a word that was omitted by error. Did
9 you mean to say that fresh okra does keep
10 well, or that it does not keep well.

11 MEMBER SMILLIE: Oh, does not. I'm
12 sorry. That's an error. Does not.

13 MEMBER WEISMAN: Thank you.

14 CHAIR DELGADO: For the record,
15 that correction is being made. And, Dan.

16 MEMBER GIACOMINI: As it is in a
17 lot of cases, the issue comes down to the
18 words used in the question. It seems -- the
19 question is, is there any okra grown near the
20 freezing facility? I mean, do you have the
21 okra, do you have a freezing facility, or if
22 you have a freezing facility, could you grow

1 the okra? Do you know how sort of -- I mean,
2 do you think the right questions were asked?

3 MEMBER SMILLIE: Yes. Again, those
4 -- if you have the okra in commercial supply,
5 and there's not an IQF facility nearby, I
6 still think you could get it done. It would
7 be hard, but it could be done, so it wasn't
8 that we had a lot of okra available, but no
9 IQF facilities. That wasn't the case in this
10 case.

11 MEMBER GIACOMINI: But what about
12 the other way around?

13 MEMBER SMILLIE: A lot of IQF
14 capacity, ready to go, and no suppliers? That
15 wasn't the case either, at least not with all
16 the IQF facilities that we contacted. And the
17 list was exhaustive. I mean, I won't say we
18 did the entire list, but we certainly did a
19 big chunk, and none of them said that they
20 never processed nor had abilities to process
21 organic okra.

22 CHAIR DELGADO: Tracy.

1 MEMBER MIEDEMA: I just wanted to
2 add. In trying to piece together a crop with
3 a frozen facility is a real trick, and my --
4 the firm I work at is a large IQF processing
5 facility, and we plan our crops very carefully
6 for their distance from the facility based on
7 the time of year. In the warmer months, our
8 spinach can't travel further than 45 minutes
9 from the field to the IQF facility, or its
10 pretty slimy by the time it gets there. And
11 okra was described to us as one of those crops
12 that grows in a warm climate, and really gets
13 slimy fast, and so I don't know exactly what
14 the radius is. At our farm with about 30
15 crops, we have it all mapped out exactly how
16 far they can travel, what the radius is. And
17 I don't recall whether that was noted in the
18 petition, but it's a very real issue.

19 CHAIR DELGADO: Yes, Steve.

20 MEMBER DeMURI: Just a comment. I
21 can tell you, Dan, that I was involved in a
22 project to try to source some IQF okra for my

1 company, and we couldn't find it either.

2 CHAIR DELGADO: Gerry.

3 MEMBER DAVIS: One other thing to
4 add to the difficulty of putting an IQF
5 facility together with a crop. I believe the
6 farm that I work for was contacted, because we
7 have IQF freezing, we have capacity, we have
8 a very long growing season. We could grow
9 okra if we chose, but one difficulty was that
10 okra is only harvested a little bit each day.
11 It's not grow a crop like peas, and you come
12 through there, harvest it all and freeze it,
13 or you can schedule freezing time. You'd have
14 to be set up to pick a little bit this day,
15 make a little run for an hour or two a day,
16 and keep doing that on and on to make the crop
17 economically feasible. And that might be
18 another complicating factor in why they don't
19 seem to fit together too well.

20 CHAIR DELGADO: Any other
21 questions, comments? Joe.

22 MEMBER SMILLIE: I'm also hoping,

1 and we certainly heard some comments
2 yesterday, and I would ask everyone to take
3 the information you've heard from this
4 Committee, and from the public, and also,
5 hopefully, we'll get some more comments, and
6 to sleep on it.

7 CHAIR DELGADO: Okay. Thank you.
8 Back to you, Julie.

9 MEMBER WEISMAN: Okay. It's my
10 turn. I have one last material that's part of
11 that group of petitions that were all
12 submitted by one petitioner, that's the ginger
13 root powdered extract. And as you have
14 already heard, ginger root powdered extract is
15 manufactured the same way as all of those
16 other harder to pronounce root extracts that
17 you heard about, in that it's extracted. The
18 ginger rhizomes actually are dried and milled,
19 and then they're placed into an extraction
20 kettle with water and ethanol. The liquid is
21 concentrated into essential oils, and
22 standardized. And then those essential oils

1 are mixed with organic astragalus root, and
2 then spray dried, and ground into a powder.

3 And, again, this is a situation
4 where the petitioner had the exact same
5 comment, that their procurement department is
6 always looking for organic forms unspecified,
7 not mentioning any particular material. And
8 an internet search found, of course, that much
9 organic ginger root is being grown, extracted,
10 and even dried, and none of this is -- not
11 necessarily spray dried onto organic
12 astragalus root, but because no acknowledgment
13 is made by the petitioner that these forms are
14 available, and they do not address why they're
15 -- that they're available, but they're not in
16 the form we need them. Because that simple
17 comment isn't even made, we found this
18 petition not to meet evaluation criteria
19 number four. And the vote on that was zero
20 yes, six no, there were no absent, no
21 abstentions.

22 And this being the last of that

1 group of petitions, I did want to make the
2 comment that we had hoped that when these
3 recommendations were posted ahead of the
4 meeting for public comment, that the
5 petitioner might have come to us with some
6 acknowledgment or some additional information.
7 That did not happen. We view this -- again,
8 I have said it before, that this whole 606
9 process is fairly new to us, and there's been
10 a learning curve on our part on how to deal
11 with it. And we believe that there's also a
12 learning curve out there in the organic
13 community about the way to petition for these,
14 so we somewhat view the petition process a
15 little bit as a conversation between the Board
16 and petitioners, as we come to a process that
17 we think meets regulatory requirements, and
18 the needs of the community.

19 So if there are no more questions
20 about that, I'm going to move on to the
21 petition for -

22 CHAIR DELGADO: Are there any

1 questions on ginger root? And we have a
2 question from the Executive Director.

3 MS. FRANCIS: Actually, more of a
4 comment, just to affirm also that the Program
5 sends out letters informing petitioners that
6 a recommendation has been made, inviting them
7 to make comment.

8 CHAIR DELGADO: And that
9 information includes the actual determination
10 from the Committee. Correct?

11 MR. POOLER: This is Bob Pooler,
12 NOP. The meeting notices went to all
13 petitioners notifying them that their petition
14 was going to be considered at this meeting,
15 and not the actual recommendation was
16 included, but I would just say information as
17 to where the recommendation was located on the
18 website was included within the letter. So
19 they were notified, and invited to provide
20 response.

21 CHAIR DELGADO: Thank you for that.
22 All right. Any questions on this material?

1 Okay. Thank you. Back to you.

2 MEMBER WEISMAN: All right. We're
3 moving on to Pectin, low-methoxy, non-
4 amidated. And I think that that requires a
5 little bit of explanation and background.

6 Pectin, everyone should be aware,
7 is listed in two places. It is listed in
8 605(b), where it's currently notated low-
9 methoxy Pectin. And on 606, it's high-methoxy
10 Pectin. And I think at the time that those
11 listings were made, the reason why low-methoxy
12 Pectin was found to be synthetic was because
13 it was what is called "amidated". In other
14 words, it is exposed to ammonia, and a
15 chemical change takes place.

16 Pectin is a material that is used
17 for texture to gel certain products. They
18 could be dairy products. I know you can't
19 make jam without Pectin. And, in fact, the
20 petitioner is -- for this material is a jam
21 manufacturer.

22 Now, what they are petitioning is

1 not a new material. They are actually
2 petitioning for a certain form of low-methoxy
3 Pectin to be reclassified as an agricultural
4 product, so it may be that this did not exist
5 at the time that low-methoxy Pectin was put on
6 the list, or it may have been not adequately
7 understood at the time, but this petitioner is
8 describing the manufacture of a product that
9 is available, that is low-methoxy Pectin, that
10 is not amidated, that is, in fact,
11 manufactured from apple pumice, which is a
12 byproduct of the juice, the apple juice
13 pressing industry.

14 So in terms of the evaluation
15 criteria, we found that it met the applicable
16 criteria. And, in fact, in terms of the
17 environmental effect, I think that it seemed
18 to us that the use of this material actually
19 had a good effect on the environment, and that
20 it provided a useful outlet for what would
21 otherwise have been a waste stream that would
22 have had to be disposed of.

1 And we also believe that in terms
2 of the -- actually, subsequent to the -- yes,
3 there has been no organic form of this Pectin
4 available, because up until now, it has been
5 included on -- low-methoxy Pectin is included
6 on 605(b) as a synthetic. It was not
7 reflected in the petition at the time the
8 recommendation was made, but further
9 discussion with the petitioner indicates that
10 this petition is actually a preparation to the
11 introduction and marketing of organic low-
12 methoxy non-amidated Pectin. So they're
13 actually preparing the ground for an organic
14 form of this material to become available.

15 And I apologize that this
16 information was not available to include in
17 the recommendation. It was not -- it took
18 place at a conversation that happened at a
19 trade show after the close of the publication
20 deadline, but I thought it was important to
21 note. So the recommendation was made for this
22 material to be listed, and the vote at the

1 time were five yes, zero no, and one absent.

2 CHAIR DELGADO: Any questions on
3 this material? Steve.

4 MEMBER DeMURI: In your discussion
5 with the petitioner, is their intention to
6 petition to have it removed as soon as they
7 have an organic form available?

8 MEMBER WEISMAN: That's an
9 excellent question. I did not ask it. I was
10 -- I guess I was so impressed that they were
11 being proactive to prepare the ground for an
12 organic material to be introduced, that I just
13 did not have my wits about me. But we can
14 find that out.

15 CHAIR DELGADO: Any other questions
16 on this material? All right. Julie, does
17 that conclude your section on 606?

18 MEMBER WEISMAN: If everyone is
19 satisfied. Oh, no, no, it doesn't. No, we
20 have one more material. I'm sorry.

21 CHAIR DELGADO: That's all right.
22 Lost track there.

1 MEMBER WEISMAN: I thought you
2 meant on the material. Okay. Yes, we do. We
3 have one more material that's being
4 petitioned, which is Tragacanth Gum, which is
5 what is called an exudite gum. This is being
6 petitioned for inclusion on 606.

7 It is actually -- at one point, the
8 Program asked us to consider whether this was
9 already included in gums that are already
10 listed on the National List, because they had
11 been included in discussions at the time that
12 gums were originally listed. And it was
13 thought that it might have been an error that
14 Tragacanth was left off the list. But we
15 felt, especially after looking at the quality
16 of the petition, that for good order sake, it
17 made sense to treat it as a new material being
18 petitioned.

19 And we found that it did meet all
20 the evaluation criteria. In fact, it is --
21 the production process is identical to other
22 gums that are already listed. What happens is

1 a cut is made in the bark of the tree, and the
2 secretion hardens, and the chunk is harvested
3 from the trees, and they are dried and ground
4 into a powder. In fact, I think there was a
5 picture up on the screen earlier during the
6 materials presentation of guar gum, which is
7 a relative, or produced in a very similar
8 manner.

9 In terms of commercial supply being
10 fragile of organic, there was a lot of
11 information given in the petition about the
12 fact that non-organic Tragacanth gum is even
13 difficult to acquire. All the Tragacanth gum
14 produced in the world comes from Iran right
15 now, and neighboring countries. So, first of
16 all, there are trade issues. No one is
17 allowed to import it into the United States at
18 the moment. However, non-organic Tragacanth
19 gum that they currently use is coming from
20 Turkey, and they are working closely with
21 Turkish growers and processors to increase
22 that supply. And they note that organic

1 agriculture in Turkey is increasing, and that
2 they feel that they can foresee in the not
3 distant future that there can be -- they will
4 be able to secure supply of organic Tragacanth
5 gum, but it's not currently available.

6 And in terms of why this would be -
7 - if there are organic substitutes, there are
8 other gums available, but Tragacanth has some
9 unique qualities that other gums do not
10 exhibit, and that's why there is a call for
11 it.

12 So we made a motion that Tragacanth
13 gum is appropriate for listing -- we made a
14 motion to list Tragacanth gum on 606, and the
15 vote on that was six yes, zero no, that was a
16 unanimous vote.

17 Oh, yes. There is one annotation,
18 water-extracted only. Gums do get produced in
19 other ways. This one being petitioned is
20 water-extracted.

21 CHAIR DELGADO: Any questions on
22 this material? Okay. Thank you. Back to

1 you, Julie.

2 MEMBER WEISMAN: That concludes the
3 presentation of materials for 606.

4 CHAIR DELGADO: Good. Can we
5 proceed with the next section then, sunset
6 materials.

7 MEMBER WEISMAN: Yes. I think on
8 the -- we had a similar situation with some
9 Handling Committee sunset materials that were
10 voted on at the full meeting. You heard the
11 situation described by the Crops Committee
12 this morning, and the same situation existed
13 for a number of materials that were
14 recommended at the full meeting for re-listing
15 on 605(a), which are Agar-Agar, animal
16 enzymes, Calcium Sulfate, Carrageenan and
17 Glucono Delta Lactone. And then also -- well,
18 I'll do A and B separately.

19 What happened was because there was
20 an additional ANPR for materials that were due
21 to sunset, and the comment -- it was published
22 in December after our meeting, and the comment

1 period closed in January, so we just need to
2 acknowledge that comments that came in, in
3 that period did not in any way call into
4 question the recommendation that had already
5 been made. So ahead of this meeting, the
6 Handling Committee voted, five yes, one
7 absent, to reaffirm those 605(a) sunset
8 decisions from the full meeting. And the same
9 is true for the material, Cellulose, to be
10 reaffirmed for 605(b). That was also a five
11 yes, and one absent.

12 CHAIR DELGADO: All right. Any
13 questions on those documents? All right.
14 Let's proceed to the next item.

15 MEMBER WEISMAN: Okay. Another
16 situation we've been needing to clean up.
17 When the -- in the multi-phase notice for
18 sunset materials, Tartaric Acid should have
19 been included on A and B with the materials
20 that I just mentioned. And, in error, was not
21 included in those ANPRs, and so, therefore,
22 could not be considered at the full meeting.

1 And so this, I believe, may be our last
2 opportunity to consider them now for sunset.

3 We have two different forms of
4 Tartaric Acid, one is one 605(a), made from
5 grape wine, and one on 605(b) from Malic Acid.

6 I did want to mention one thing
7 regarding sunset, and acknowledge a comment
8 that was made yesterday about the availability
9 of organic -- we heard that there's organic
10 Tartaric Acid available. And what I wanted to
11 say is that this -- the recommendations were
12 made and posted six weeks before this meeting,
13 I believe. And the discussion about Tartaric
14 Acid has been happening for at least two
15 meetings before that, and so what I would like
16 to say is that the petition for the removal of
17 a newly available organic form of a listed
18 material can be made at any time.

19 I think that there was a lot of
20 time when this information came forward, and
21 getting it for the first time yesterday does
22 not really help our process. So I want to

1 acknowledge that we did -- we appreciate being
2 informed that Tartaric Acid organic may be
3 available now. We have absolutely no
4 opportunity at this meeting to qualify that
5 statement. Well, I shouldn't say that we have
6 no opportunity. I suppose -- I think we
7 certainly have an opportunity to question the
8 person who made the comment, but I don't -- it
9 would still require time for us to verify, and
10 discuss, and talk about, so I would encourage
11 that if someone has organic Tartaric Acid
12 available, that it would have been helpful to
13 know about it at least in the last six weeks,
14 not just yesterday.

15 CHAIR DELGADO: Julie, do you plan
16 to change your recommendation?

17 MEMBER WEISMAN: I do not, no.

18 CHAIR DELGADO: Okay. Any
19 questions?

20 MEMBER WEISMAN: But I also didn't
21 finish saying what the recommendation was.

22 CHAIR DELGADO: Please.

1 MEMBER WEISMAN: Okay. I'm sorry.
2 The recommendation was to list, to re-list
3 both on A and B. We did not receive any
4 comments opposing this. And the vote was five
5 yes, and one absent. There was no dissension
6 on the Committee.

7 CHAIR DELGADO: Go ahead. Madam
8 Secretary, please.

9 SECRETARY HEINZE: I wanted to add
10 that our review was complicated by the fact
11 that the current listings on the National List
12 do not include the annotations made from grape
13 wine, and made from Tartaric Acid, so we ended
14 up doing quite a bit of research into past
15 actions of Boards. In fact, went back to the
16 1995 transcripts, where these were originally
17 voted on. And so one thing that we would ask
18 is perhaps the Program could help with a
19 technical correction to add those annotations,
20 to clean it up for future boards.

21 We have tried to, in our
22 recommendation, include all that history, so

1 that five years from now when some of us are
2 not here, and they have to be reviewed, we've
3 provided some guidance. But I think a
4 technical correction might be helpful.

5 CHAIR DELGADO: Okay. Any
6 comments? Dan.

7 MEMBER GIACOMINI: Thank you, Mr.
8 Chairman. On this technical correction issue,
9 Tartaric Acid is not just sort of a two-way
10 street, it's a three-way street. We have the
11 Tartaric Acid on 605(a) from grapes, where we
12 are modifying a natural product. Then there's
13 also the Tartaric Acid that we have on B,
14 which is coming from Malic Acid. Malic Acid,
15 L-malate is on 605(a) coming from a natural
16 source. Not on the National List is DL-malate
17 from a synthetic source being butane.

18 We've done the best we can going
19 directly to -- the Committee has done the best
20 they can going directly back to the
21 transcripts, but anyone here with any
22 historical memory of whether that was actually

1 generic malate with no designation that was
2 reviewed and voted on for B, or whether the
3 intent was L-malate being the natural source,
4 and not allowing the petroleum source, any
5 historical memory of that would -- in public
6 comment, or some other form, would be
7 appreciated.

8 CHAIR DELGADO: Any other comments?
9 Julie.

10 MEMBER WEISMAN: I just wanted to
11 make one correction on the recommendation for
12 this. At the very, very bottom, I think it
13 just needs to be corrected that where it --
14 okay. She fixed it already. Never mind.

15 CHAIR DELGADO: What was the
16 correction?

17 MEMBER WEISMAN: Well, the correct
18 was the last three words were made from
19 Tartaric Acid. That's what's in our books,
20 and that was not -- it should have said made
21 from Malic Acid.

22 CHAIR DELGADO: Okay. Any

1 questions? Jeff.

2 VICE CHAIR MOYER: Just a question
3 for you, Julie, and I don't know if you can
4 answer it. Is the reason that there's two
5 listings there, because they're two totally
6 different materials that are used two totally
7 different ways, or was it a convenience for
8 end-user?

9 CHAIR DELGADO: Do you intend to
10 address that question?

11 MEMBER WEISMAN: Katrina is going
12 to address that.

13 CHAIR DELGADO: Katrina.

14 SECRETARY HEINZE: This gets a
15 little bit to the heart of the definition of
16 materials. It is the same material, but its
17 source is different. So something the
18 Material Working Group discussed in quite a
19 bit of detail, is that a material is not just
20 what you have in the glass, but it is what its
21 original source is, and how it was processed
22 to get to that final result.

1 Tartaric Acid is the poster child
2 for that. Same material, same thing in the
3 glass, two very different sources, one that
4 the original board felt was a non-synthetic
5 source, grape wine, and one that they felt was
6 a synthetic source. Getting to Dan's comment
7 that historical reasons why they felt it was
8 a synthetic source are a little bit lost in
9 history for us. Does that help?

10 VICE CHAIR MOYER: Well, it does
11 help, but my question was, do we continue to
12 need both materials, given the fact that one
13 is synthetic, or at least listed as synthetic,
14 and the other is a non-synthetic, if they're
15 both -- and the indication of the report was
16 that the majority of what's used out in the
17 world is from the grape juice. Do we, indeed,
18 continue to need the synthetic on the list?

19 CHAIR DELGADO: Dan.

20 MEMBER GIACOMINI: I have the same
21 concerns that you do, Jeff. It's my
22 understanding that there's a slightly

1 different way, and its characteristics and
2 processing, and maybe we'll hear some comment
3 on that later in the day.

4 VICE CHAIR MOYER: Thank you.

5 CHAIR DELGADO: Any other
6 questions? Okay. Back to you, Julie.

7 MEMBER WEISMAN: That now does
8 conclude my presentation.

9 CHAIR DELGADO: Okay. Well, thank
10 you very much to you and the rest of the
11 Committee members. Well done. And now we
12 have concluded the review of recommendations
13 and materials, and we're due for a break. It
14 is quarter after the hour. We have a comment
15 from Mr. Smillie.

16 MEMBER SMILLIE: Before you make a
17 ruling, Mr. Chair, I would humbly submit that
18 we don't lose that time. Would it be
19 possible, unlike yesterday, to see who the
20 first commentators are, and see if they would be
21 ready to go.

22 CHAIR DELGADO: They are ready,

1 they say. Let me check with our Executive
2 Director, and this is a proposal about it. I
3 propose that we start calling people. If
4 they're here, fine. And if they're not, we'll
5 keep their name on the list in the order that
6 they had appeared, and we'll continue calling
7 them until we reach the agreed time of
8 initiation of the comment. Will that satisfy
9 our legal -

10 MS. FRANCIS: I have a feeling
11 they're all here.

12 CHAIR DELGADO: Okay. So we can
13 proceed.

14 MS. FRANCIS: It's the poultry
15 folks.

16 CHAIR DELGADO: And we have a
17 comment from the Secretary. Yes, ma'am.

18 SECRETARY HEINZE: A break before
19 public comment would be helpful, at least for
20 me.

21 CHAIR DELGADO: And well deserved,
22 absolutely. So it's quarter after the hour.

1 We'll see you here at 3:30 to start with
2 public comment. Thank you.

3 (Whereupon, the above-entitled
4 matter went off the record at 3:14 p.m. and
5 resumed at 3:37 p.m.)

6 CHAIR DELGADO: We have quorum, and
7 we will continue with our next item on the
8 agenda, and that is public comment. We'll
9 start. Do we have Valerie, have we heard from
10 Marty? They have agreed, so the first one up
11 is Marty Mesh, if you'll please proceed to the
12 podium. We're making some updates here. I
13 will remind the presenters to give your full
14 name and affiliation for the record.

15 MR. MESH: Are you guys ready?

16 CHAIR DELGADO: We are ready.
17 Please proceed.

18 MR. MESH: Marty Mesh, and I have
19 a proxy for Rom, who was supposed to speak
20 yesterday on aquaculture. If you can tell me
21 five minutes into one, then I'll know.

22 SECRETARY HEINZE: Okay. So you

1 have two separate five minutes.

2 MR. MESH: Correct. And three, if
3 you want to be really nice.

4 (Laughter.)

5 MR. MESH: So for the new person,
6 Dr. Flann, I'm Marty Mesh. I started farming
7 organically in 1972, on the larger scale in
8 '76. Incidentally, Belleview Gardens Organic
9 Farm has produced a small amount of quality
10 organic okra ever since 1976. I have
11 approximately 160 acres, and my partner has
12 several hundred additional acres, but I can
13 circle back to okra in just a minute.

14 I helped form Florida Organic
15 Growers, and currently serve as Executive
16 Director of FOG, which operates quality
17 certification services at NACA. Additionally,
18 I serve on the boards of the OTA, which none
19 of my comments serve as official position of,
20 the boards of the National Campaign for
21 Sustainable Agriculture, the ACA, and as
22 President of the board of the Southern

1 Sustainable Ag Working Group, which again may
2 be relevant to your discussion about organic
3 okra.

4 I want to welcome you to the board,
5 as well as thank all of you for your
6 tremendous time commitments on behalf of the
7 whole organic community for all the NOSB
8 members. I also want to thank the Department
9 for its positive work on a very small budget,
10 and hope with additional resources, which are
11 long overdue and will increase with time, that
12 the issue of funding is no longer the reason
13 for inaction or delayed action by the
14 Department.

15 While I'm sure I could focus on the
16 positive work done by both the Department and
17 the Board, let me at least touch on a few
18 other concerns. First, to recap the lack of
19 a simple pasture rule seems to be undermining
20 faith in the U.S. National Organic program,
21 and organic products in the marketplace. The
22 community and industry have been in sync for

1 years, and the continued delay is negatively
2 affecting the growth of organic agriculture,
3 and the health of the industry.

4 QCS was the first certifier to
5 certify organic shrimp after the USDA Program
6 Director stated in a public workshop for the
7 organic farmers that if one can produce shrimp
8 organically using the rule, then by all means,
9 put a USDA seal on it, and put it out in the
10 market.

11 People have been producing organic
12 mushrooms without specific standards, organic
13 honey, and so we thought the statement by the
14 Program Manager enabled a new sector of
15 producers to differentiate product in the
16 marketplace.

17 Producers invested hundreds of
18 thousands of dollars. We, the certifier, made
19 them source organic feed at considerable cost,
20 and then shortly thereafter, because of the
21 controversy surrounding salmon, USDA reversed
22 its opinion, and said to the get seal off all

1 the seafood, including shrimp, tilapia. And
2 that has caused considerable market
3 disruption, confusion, and organic shrimp
4 producers to go bankrupt, while foreign-
5 produced shrimp and salmon, in some cases far
6 from compliant with the U.S. regulation, but
7 without the U.S. seal, has taken the place on
8 the marketplace shelf.

9 And now the recommendation is to
10 reward the producers and the certifiers with
11 more market opportunities; this all in the
12 name of refusing our many years ago suggestion
13 to start with the basics, start with the low-
14 hanging fruit, start with shrimp, tilapia,
15 catfish, and build upwards, but to get
16 started. Those several years to build an
17 industry would have, by my calculations, been
18 completed, if we had ever gotten started to
19 begin with.

20 Shrimp continue to be held hostage
21 to the more controversial complicated, and not
22 easily solved salmon battles, which,

1 incidentally, once, if and when the feed
2 issues are wrestled down, net pens can
3 continue to hold up the simple peaceful
4 organic shrimp from gaining its rightful place
5 on a marketplace shelf. And now, adding insult
6 to injury, it seems that we need to move QCS
7 off-shore under the current recommendation.

8 Now, the critical feedback from the
9 technical staff, who have much less baggage
10 than me, and are joyful at the progress being
11 made from the recommendations, and I can go
12 into the specifics on wording that they've
13 said, but you'll have to ask me later on,
14 because I'm going to run out of time. So let
15 me skip right to okra. And I'm happy to come
16 back and answer any questions on specific
17 wording suggestions on the aquaculture
18 recommendations. Or, as Tracy asked, on group
19 certification issues.

20 Okra. As I've said, our farm is
21 certified, has certified organic okra. Okra
22 grows well in the south. On the petition it

1 says CCOF was checked with, and on behalf of
2 agriculture outside of California, and yes, it
3 does exist. And certifiers should maybe more
4 on the ground in areas where okra grows well.
5 You know, I have to raise concerns. I didn't
6 see any list of who was called, and I don't
7 believe I'm convinced that the petitioner has
8 tried to find organic okra, where okra likes
9 to grow. I think this petition may need to be
10 voted down at this point.

11 At Southern SOG we have not
12 received any communication or outreach looking
13 for suppliers of organic okra. And if a fair
14 and equitable contract was offered from
15 companies like General Mills and Campbells, I
16 believe there may be growers interested.

17 There is certainly production, harvesting, and
18 post-harvest challenges with okra. You have
19 to pick it every other day by-hand, make it
20 worth our while -

21 CHAIR DELGADO: Marty, your time is
22 up. Can you wrap up, please.

1 MR. MESH: That's the first guy's
2 wrapped up. Man, I'm ahead of schedule. I
3 could have gone back and done the aquaculture
4 one, but all right.

5 CHAIR DELGADO: Please continue.

6 MR. MESH: So make it worth our
7 while as growers, and I'm sure there'll be
8 some folks interested.

9 Let's see. You have to at least
10 have the courtesy to talk to us in the south
11 before putting conventional okra on the list.
12 Liana mentioned Alrussio, a former member of
13 this board, who now heads an effort to get
14 more African American farmers in the South
15 involved growing organically who had the
16 email. Where is this kind of stuff heading?
17 What would be next? Organic frozen okra ready
18 for frying that doesn't contain organic okra?
19 Call it gumbo made with something, call it
20 whatever you want, but don't call it organic
21 okra.

22 I believe the petitioner has the

1 corporate resources to find, or to get a
2 facility located where you need to have it
3 located, down south where we love okra, know
4 how to grow it, know all the wonderful ways to
5 prepare it, and where the differences between
6 organic and non-organic production can be
7 clear, so that organic okra that comes from
8 there will not be confused.

9 Going back to the aquaculture
10 stuff. Let me at least touch on organic seed.
11 We had concerns on the recommendation, but
12 hearing CCRF say that 2 percent of vegetable
13 seeds are organic, and likely other west coast
14 certifiers, if those numbers are consistent or
15 similar for other organizations, we actually
16 support ramping up the -- something needs to
17 be done to make people use organic seed.

18 The CACC recommendation for Tracy,
19 you'll have to ask me about. Tetracycline I
20 think is off the list now. Methionine, I
21 think I'm supportive of a three-year, not a
22 two-year -- it didn't always -- things don't

1 always go perfect. In fact, most things
2 don't, and I would be pleasantly surprised if
3 a new variety can be grown and an
4 infrastructure and relationship solidified
5 within the two-year framework. I would think
6 that highly unlikely given reality. So let's
7 go back to fish.

8 Okay. On 205.208(b) aquatic plants
9 may be grown in open water systems. You know,
10 our comment was, it's not clear what open
11 water system means. Are we talking about
12 growing in public ponds, lakes, oceans? If
13 that's the case, then this may better fall
14 under the wild harvest area, and not farmed
15 aquatic plants. And if wild harvested, then
16 the staff thought that wild fish can't be part
17 of it, but yet you're allowing wild aquatic
18 plants. They thought there was a bit of a
19 disparity among the two. They also were
20 concerned about how one would manage the
21 possible aggregate, cumulative effect of wild
22 harvesting.

1 Going to the aquaculture one
2 itself, 205.2, organic certification for
3 foreign certifiers shouldn't be allowed for
4 several reasons. They identified the minority
5 opinion as being one that they support, that
6 you can't base it on foreign certifiers. As
7 of today, all the standards are currently
8 private standards, as Joe mentioned, and some
9 standards allow terrestrial animal byproducts
10 to be certified organic, and you're using it
11 for aquaculture feed.

12 I think our solution would be to
13 allow fish meal and fish oil from rendered
14 fish facilities to be used as a supplement.
15 Maybe that's a capital S, Supplement, and a
16 stair-step reduction method has been proposed
17 by the AWG, or utilize the statutory authority
18 to make wild caught fish renderings in organic
19 livestock feed product.

20 Live foods on D, clarification must
21 be provided what exactly constitutes live
22 foods, insects, worms, and are you saying that

1 they need to be certified organic, too, was
2 the question from our staff.

3 Lipids, they had a couple of
4 technical corrections on your wording on the
5 lipids one. And that is, feed for aquaculture
6 products for human consumption may, and they
7 thought it should say "must", or "shall not"
8 contain lipids from sources. That may doesn't
9 give the regulatory assurance of your desire.
10 Second line, line two, "except that other
11 lipids from organic sources", and it wasn't
12 clear whether or not those other lipids could
13 or couldn't be from terrestrial animals.

14 All right. So let's just go on.
15 If you want to know, you'll just have to ask
16 me. On the whole, they thought the livestock
17 recommendations had merits, and we're pretty
18 happy with them. On J -- well, if you want to
19 know the technical correction, you'll have to
20 ask.

21 CHAIR DELGADO: Any questions for
22 the presenter? Yes, Tina.

1 MEMBER ELLOR: Marty.

2 MR. MESH: Yes, Tina.

3 MEMBER ELLOR: You wouldn't have
4 any specific recommendations for wording on
5 aquaculture, would you?

6 MR. MESH: Funny you should ask,
7 Tina. On L, where you have fish meal or fish
8 oil may not be sourced, their wording
9 suggestion was must not be sourced, as opposed
10 to may.

11 CHAIR DELGADO: Any other questions
12 for the presenter?

13 MR. MESH: Like on grower groups,
14 maybe.

15 (Laughter.)

16 CHAIR DELGADO: Tracy, do you have
17 a question?

18 MEMBER MIEDEMA: Marty, do you have
19 any specific feedback on the document, the
20 guidance document that was posted; for
21 instance, in the area of conflict of interest,
22 or internal control systems?

1 MR. MESH: Yes. Kudos goes to
2 Tracy for her work, patience and willingness
3 to listen to very divergent opinions on behalf
4 of all this. We do have a paragraph typed out
5 in red, but I think I have to say that our
6 sense is that the grower group dilemma has
7 evolved to group certification, and we really
8 support it being focused to grower groups for
9 now, and getting this one off the table. For
10 those growers that outnumber all the other
11 growers combined in the world, the most
12 disadvantaged, the most at risk growers in the
13 world for being left out of the organic
14 marketplace, and that we really urge you to
15 focus on what the original issue was, which
16 was grower group certification, for now, and
17 leave the other for another day to have a
18 discussion about. And I'll try to -- we're
19 concerned about throwing the baby out with the
20 bath water.

21 CHAIR DELGADO: Tracy.

22 MEMBER MIEDEMA: May I ask a

1 follow-up question?

2 MR. MESH: Sure. You can ask all
3 you want, until he cuts you off.

4 CHAIR DELGADO: Tracy, please.

5 MEMBER MIEDEMA: Would you or FOG
6 be able to articulate what the benefits are to
7 grower groups of not allowing other groups
8 that meet the rigorous criteria?

9 MR. MESH: You know, Tracy, I think
10 sometimes it's the confidence of a label is in
11 the marketplace, and the confidence of those
12 people supporting a label is in their hearts,
13 or in their minds. And that we've all, in the
14 organic industry, heard well, show me the
15 science, or where's the science behind it?
16 You go, we know it's better. Okay? It's in
17 our heart, that sometimes some of these things
18 may be passion, and that I'm concerned about
19 the baby being thrown out with the bath water,
20 that grower group certification may be lost if
21 this board continues down the road of trying
22 to essentially, for lack of a better word,

1 shove group certification down the consuming
2 public's mind.

3 I saw how the pasture issues were
4 framed in the press, or on the internet, and
5 you could debate pasture all you want. But
6 what I know is, it hurt the industry.

7 MEMBER MIEDEMA: Okay.

8 CHAIR DELGADO: Tracy, comments?
9 No. Any other comments from the board,
10 questions? Okay. Well, thank you very much,
11 Marty.

12 MR. MESH: Thank you all.

13 CHAIR DELGADO: Up next is Chris
14 Pierce, and after Chris we have Dave
15 Martinelli.

16 MR. MESH: And I wanted to thank
17 Chris for allowing me to go before Methionine.

18 MR. MARTINELLI: We're actually
19 just going to do this as a group Methionine
20 presentation.

21 CHAIR DELGADO: Please.

22 SECRETARY HEINZE: And you are

1 which folks?

2 MR. MARTINELLI: I'm Dave
3 Martinelli.

4 SECRETARY HEINZE: Okay.

5 MR. MARTINELLI: Coleman Natural,
6 but I'm actually Chair of the Methionine Task
7 Force.

8 SECRETARY HEINZE: So we have
9 Chris, Dave, David, and David?

10 MR. PIERCE: That's correct. I am
11 Chris Pierce.

12 SECRETARY HEINZE: Okay.

13 CHAIR DELGADO: You're Chris
14 Pierce.

15 SECRETARY HEINZE: So you're
16 combining your time.

17 MR. MARTINELLI: We're all members
18 of the Task Force.

19 SECRETARY HEINZE: Okay.

20 MR. MARTINELLI: So what I'm going
21 to do -

22 SECRETARY HEINZE: So you want 20

1 minutes.

2 MR. MARTINELLI: Correct.

3 SECRETARY HEINZE: This is just
4 purely administrative questions on my part.

5 MR. MARTINELLI: Okay.

6 MS. FRANCIS: And could you please
7 each walk up to the microphone and introduce
8 yourself and your affiliation.

9 CHAIR DELGADO: At this point, yes,
10 please.

11 MR. MARTINELLI: Okay. Dave
12 Martinelli, Coleman Natural.

13 MR. PIERCE: I'm Chris Pierce with
14 Heritage Poultry Management Services.

15 MR. WILL: David Will, Chino Valley
16 Ranchers.

17 MR. BRUCE: David Bruce, Organic
18 Valley.

19 CHAIR DELGADO: Okay. Thank you.
20 So who will start?

21 MR. MARTINELLI: So I will start.
22 I'm going to go through this PowerPoint, and

1 then I'm going to turn it over to these three
2 to give kind of their background and
3 perspective, and their experience with trials.
4 So what we'll do, there's maybe a 10 or 15-
5 minute PowerPoint, they'll do their thing, and
6 then we can open it up to Q&A.

7 CHAIR DELGADO: Very good.

8 MR. MARTINELLI: So just to kind of
9 get everybody up to speed, I think everybody
10 is familiar with the issue. Obviously,
11 Methionine is a necessary nutrient for poultry
12 production. There's some history with the
13 board, twice you've approved a three-year
14 annotation to allow Methionine in organic
15 poultry production. The Task Force, of which
16 I am Chair, has been working on this issue for
17 the last six years, and I want to say thank
18 you for the opportunity to update you. I had
19 a chance to talk to you in November, kind of
20 what the Task Force was all about. And you
21 urged us to submit a petition at that time, so
22 we've gone ahead and submitted the petition

1 that's before you. And we're active on a
2 number of fronts developing alternatives, and
3 that's what I really kind of want to talk
4 about today.

5 To give you a little sense of who
6 the Task Force is, these gentlemen will speak
7 with respect to their personal experience, but
8 it's really a volunteer group of organic
9 poultry producers. We've aligned ourselves
10 with partners through a variety of
11 universities. You're going to get a
12 presentation later today from Dr. Walter
13 Goldstein, who is not officially a member of
14 the Task Force, but we've obviously worked
15 very closely with him. And I'll hit on some
16 of the projects that we're currently under
17 development with him. But all these
18 institutions have helped us in some capacity,
19 either with literature review, research,
20 trials, what have you.

21 I also wanted to kind of frame it
22 up for everybody in terms of the scope of the

1 industry that we're talking about. This is
2 kind of an interesting chart that was pulled
3 together from some USDA data over the last 15
4 years, just kind of showing the growth of the
5 organic ling and industry, and I've got -- the
6 next slide shows a similar trend for the
7 organic broilers, so I don't want to belabor
8 these, but in both cases you see a significant
9 growth in the last five years in this
10 industry.

11 And the final point that I want to
12 make around the organic poultry industry is
13 that it touches a lot of other producers in
14 this room. It's not strictly eggs and meat,
15 but it's a variety of products that are, in
16 turn, made from eggs and meat. So when we're
17 talking about Methionine, the impact we're
18 talking about is very significant and wide-
19 ranging.

20 I think the question of the day is
21 really why do organic poultry producers need
22 Methionine, and is it purely a production

1 crutch, or are there legitimate bird health
2 and environmental concerns that appropriate
3 levels of Methionine in the diet ameliorate,
4 so we've got a number of studies here that I'm
5 just going to kind of run through them.

6 I've actually pulled together for
7 the board's benefit a listing of all the
8 reports that were cited in this slide show,
9 and I'll leave it with Valerie. There's a
10 variety of papers and presentations that came
11 out of the literature review which we had
12 conducted about a year ago by some folks at
13 Cal Poly Pomona.

14 This was a study from 1997,
15 Ambrosen and Petersen, indicating that
16 inadequate protein decreased feather plumage
17 and cannibalism in laying hens, so actually
18 that's decreased feather plumage, not
19 decreased cannibalism. It's actually
20 cannibalism laying hens, and actually they
21 kind of go through two scenarios, that if
22 you've got inadequate protein in the diet, at

1 a minimum, you're going to get poor feather
2 condition and feather pecking, in a most
3 highly evolved state you would have
4 cannibalism. Next slide, please.

5 The other big issue, in addition to
6 bird health, are environmental impacts. One
7 of the strategies to overcome low Methionine
8 diets would be to feed an excessive amount of
9 other proteins in the diet. And this, in
10 turn, is excreted by the hen typically as
11 nitrogen, and also creates ammonia emissions,
12 so there's been studies conducted at Iowa
13 State that indicate that for the amount of
14 protein increase that would be needed in the
15 diet to provide a higher level of Methionine
16 to the birds, you would have 150 percent
17 increase in the ammonia generation and
18 emission.

19 If you go to the next slide,
20 there's a series of reports out of Europe that
21 I'm going to touch on, because they've been
22 grappling with this issue, as well. This was

1 from a 2001 workshop that an inadequate supply
2 of amino acids is not simply a production
3 problem. There was a report from Owen in 2000
4 that feather pecking on each other feathers in
5 search of amino acid is found when Methionine
6 is deficient in the diet, and that obviously
7 creates a bird welfare problem. Next slide,
8 please.

9 There was an extensive study that
10 I've got a copy of in this document that was
11 done around organic poultry production in
12 Ireland, where they concluded that obviously
13 the prohibition in the EU on adding Methionine
14 was a serious health concern. Again, around
15 the same issues we're talking about, animal
16 health and environmental welfare. And the
17 fact that you've got to then formulate the
18 diets to have excessive levels of protein.

19 This, again, is from the report out
20 of Ireland, and I think the take-away here is
21 that Dr. Owen Keene from Heritage Poultry
22 Management Services recommends that Methionine

1 is needed in organic poultry production in
2 order to maintain the best nutrition and the
3 health of all the avian species.

4 This is a report out of Germany in
5 2004 on the impacts of raising organic poultry
6 without Methionine. And, again, copy of the
7 report is here, but their concluding remarks
8 are that the -- from the animal welfare and
9 environmental pollution perspective, synthetic
10 Methionine should be a legal feed component in
11 organic broiler production.

12 And then this is our last European
13 reference. There was a report done by DEFRA
14 in the UK, and they talk about without
15 additional organic Methionine rich protein
16 sources, Methionine deficiencies will become
17 more pronounced, and more widespread in
18 organic poultry production, as the level of
19 permitted non-organic proteinaceous
20 ingredients in the diet fall. This will
21 impact on bird health and welfare.

22 Also, one of the issues that was

1 pointed out in the Livestock Committee's
2 review of our petition, and it's a great
3 point, is have we looked Heritage breeds? Do
4 Heritage breeds because they're slowing
5 growing genotypes, do they offer an
6 opportunity to avoid supplementing the diet
7 with synthetic Methionine? And there's
8 actually been some work done by Ann Fanatico
9 out of the University of Arkansas. This is
10 pulled from her latest body of work. There
11 was an abstract done in 2006, where she
12 indicates that the slower growing genotypes do
13 not appear to have substantially lower
14 Methionine requirements, which agrees with
15 previous research, and it's consistent with
16 the conversations our Task Forces had with
17 her, as well.

18 One of the other points raised in
19 the Livestock Committee's recommendation was
20 about a pasture-based system; to the extent
21 that would be able to provide supplemental
22 Methionine to the birds. It's really -- we

1 kind of grouped it into two categories.
2 There's insects and earth worms, and there's
3 grass. And this slide specifically speaks to
4 the insects and earth worms.

5 And if you recall from our November
6 presentation, both insects and earth worms
7 carry an elevated level of Methionine, but in
8 and of themselves, especially in the
9 quantities found in nature, they don't
10 typically close the gap between what the
11 Methionine in the diet is, and what the bird's
12 actual nutritional requirement is.

13 Dr. Joe Moritz from the University
14 of West Virginia has also presented to the
15 Task Force about a year ago, his findings on
16 pastured poultry, and this is a take-away from
17 one of his reports, that Methionine
18 requirements -- he ran a no-Methionine group
19 of birds as part of his trial. And, again,
20 it's in the book here. Methionine
21 requirements of pastured no-Methionine birds
22 were not completely met by the forage.

1 And then this is a report out of
2 Canada from the Manitoba Department of
3 Agriculture, specifically talking about grass.
4 And their point is that grass is not easily
5 digestible by poultry, and so it's not as
6 digestible as the typical poultry diet. And
7 there are tremendous environmental benefits to
8 having the birds outside and foraging, but
9 from a nutritional standpoint, from the
10 standpoint of closing the gap on Methionine,
11 grass itself is not the answer either.

12 So I'm going to switch gears a
13 little bit. We've talked about some of the
14 problems with Methionine deficiencies, but I
15 really also want to talk to you about the work
16 that the Task Force is currently engaged in.
17 And there's three specific alternatives that
18 we're really focused on and getting funding
19 for, and making some progress with.

20 I don't want to steal Walter's
21 thunder. He's got a great presentation on
22 high Methionine corn. And obviously you

1 engaged him a little bit earlier in some
2 questions. I do want to point out that the
3 Task Force has funded two projects this winter
4 with the Michael Fields Agricultural
5 Institute, the project in Chile and the
6 project in Hawaii, and that seed is coming
7 back to the U.S. and being used not only for
8 feedstock development, but also for further
9 hybrid development. And the Task Force has
10 also signed up for this year to fund those,
11 the planting of those seeds and the collection
12 of seeds both for the hybrids and for the
13 feedstock development.

14 And with the feedstock, what the
15 Committee has agreed to do is we have agreed
16 to buy that grain back and run trials with
17 that, so we will get the benefit of his
18 agronomic expertise. Can this corn be grown?
19 And then we, in turn, will buy that feed, and
20 feed it to birds to see what does it do in the
21 diet, or what is the performance of the birds
22 with that in the diet.

1 We also are very interested in the
2 alternative of naturally produced or naturally
3 fomented Methionine, and we currently have a
4 proposal that's been put in front of us from
5 the University of Arkansas to do a -- it's a
6 study to do some research, a three-phase
7 project around developing a natural source of
8 Methionine. We've also been in contact with
9 a private party who has -- supposedly is
10 further along on this process, that we've
11 asked to submit a proposal for additional
12 research funding, put their project to us.
13 And what we really want to do is get side-by-
14 side proposals, see which group is further
15 along, and then provide some funding to
16 whichever group can get us to go quicker in
17 terms of bringing this to fruition. We're
18 really hopeful, this is a lot of theory in
19 this concept, but I think from an overall
20 efficacy standpoint, this one has a lot of
21 merit. So this is one we're very keen on
22 supporting and funding.

1 The third area that we're working
2 in, and Dr. Karreman had brought this up in
3 the November NOSB meeting, you all had a
4 presentation from Neptune Industries,
5 specifically around aquaculture at that point,
6 but this is a company that's engaged in a
7 pilot project to do insect meal. And I've had
8 conversations with them. They are very
9 interested in working with us, and we're very
10 interested in working with them. Their time
11 line is a little bit elongated. Originally,
12 I think, at the NOSB meeting, they were
13 talking about being in production in 2008.
14 Now they're talking about maybe a pilot in
15 2008, but actually not in full-scale
16 production until 2009. I have yet to see
17 actual specs on what the product looks like,
18 so we can get a nutritionist to look at it,
19 see how it would work in the diet, so that's
20 kind of the next step in this process. And
21 then we can start talking about availabilities
22 and pricings. And, obviously, the big thing

1 for us is to get it on the farm, do some farm
2 trials, and see how the birds perform with it.

3 So what we've tried to do here is
4 kind of indicate to you what -- address the
5 concerns that were raised by the Livestock
6 Committee, particularly, the minority opinion.
7 There is a full body of research that's been
8 done on this topic. We are going to continue
9 to do trials. We actually have a number of
10 trials in the pipeline on a sufficient scale
11 to be a viable trial, that we can hopefully
12 get some real meaningful data back on. We can
13 talk about that when these folks present
14 behind me.

15 Clearly, we've cited improved
16 performance in the petition. It's our
17 perspective that improved performance is just
18 the consequence of healthier birds. You're
19 not going to get better performance if the
20 birds aren't healthy, and our objective is
21 around the health and welfare of the birds.

22 And, lastly, the point I

1 illustrated earlier about the size of the
2 industry and the impacts. This is just too
3 important an issue to let go. There's a great
4 concern out there by producers that they
5 simply won't be able to raise organic poultry
6 come the fall if we don't have an additional
7 extension. And the ramifications and
8 repercussions of that go well beyond just the
9 poultry industry, it's really the entire
10 industry that will be impacted.

11 One of the things that I don't
12 think the Task Force has done a very good job
13 with is communicating back with you folks.
14 You've had a commitment to us to give us
15 additional periods of time to get some work
16 done, and we've kind of dropped the ball in
17 terms of communicating back to you what we are
18 doing. So I think the November meeting was
19 kind of the first step in that. Hey, here's
20 letting you know how your commitment of time
21 is playing out, and our commitment of research
22 and development. So one of the things we

1 wanted to leave you with is a time line that
2 we've developed around actionable goals,
3 specific trials that we're looking at running,
4 when we're going to get those trials started.
5 We still need to get turkey trials going. We
6 need to get the turkey community kind of
7 involved in this, as well. We've got specific
8 due dates and actionable items for high
9 Methionine corn, for the natural Methionine
10 and for the insect meal. Next slide, Valerie.

11 I think the most important thing is
12 at the bottom here, that it's our goal to
13 provide regular updates to you all over the
14 next 24 months at your meeting, if we can get
15 a 5-minute slot, or 10-minute slot to say
16 here's where we are, here's the projects we're
17 working on, here's what we're finding out good
18 or bad, here's the progress we're making on
19 research and development. And we'll get Dr.
20 Goldstein to present, as well. But I do want
21 to keep that dialogue open and keep it going
22 during an extension period so you're not left

1 in the dark wondering what the heck the
2 Committee is up to, and what we're doing. So
3 we'll pledge that to you, that we will keep
4 that line of communication open.

5 I do want to give these folks a
6 chance to introduce themselves and talk a
7 little bit about their backgrounds,
8 specifically around Methionine. We also have
9 -- I do want to acknowledge, we have a number
10 of producers in the room, as well, folks that
11 we deal with on the East Coast. They're a
12 little bit reluctant to come up here and
13 actually do a full-blown presentation, but I
14 do want to acknowledge the fact that they're
15 here, and they're, again, very interested in
16 this issue.

17 SECRETARY HEINZE: I'm just telling
18 you, you've got five minutes.

19 MR. WILL: My name is David Will.
20 I'm with Chino Valley Ranchers, and we're
21 organic egg producers in California. We have
22 actually been working with the Methionine Task

1 Force for about the last two years, and one of
2 the things we've noticed is that the trial
3 data on layers is very small to lacking, so
4 our company has committed with help of the
5 Task Force. We actually on May 14th set 22,000
6 layers of which 11,000 will be grown under our
7 normal management program, and 11,000 will be
8 grown with no added Methionine to their diet
9 for the next 100 weeks, or as long as we can
10 without seriously impacting the bird health.

11 We will be providing regular
12 updates, both visual performance and health
13 updates through the Methionine Task Force.
14 And we'd like to invite any of you, if you're
15 in southern California, we'd be more than
16 happy to bring you out. You can take a look
17 at the birds side-by-side. They will be in
18 sister houses. We anticipate that they will
19 be moved to lay sometime in early October, and
20 have some sort of significant egg production
21 numbers or comparisons some time in mid-
22 December. So we hope to alleviate the

1 concerns that there hasn't been a full-scale
2 trial with this program.

3 MR. BRUCE: My name is David Bruce,
4 and contrary to popular opinion, you don't
5 have to be named David to be part of the Task
6 Force. The last time I testified to the NOSB
7 was about outdoor access, 15 years ago when we
8 were just starting the egg program in Organic
9 Valley. Today, the co-op is now over 1,400
10 members strong. The egg program itself is 87
11 members in four states, primarily Midwest and
12 here on the East Coast.

13 And I'm also representing the
14 Poultry and Turkey Production for Organic
15 Valley. So, obviously, our producers have a
16 very strong interest in continuing the allowed
17 use for at least another two, hopefully
18 another three years.

19 We've been active for the last five
20 to six years pursuing the whole list of
21 alternatives, working closely with
22 universities. We've done three different sets

1 of fairly small-scale trials, but one with a
2 rice brand derivative, one with a potato
3 protein, and then working very closely with
4 Dr. Walter Goldstein on his high Methionine
5 corn ones. And we're going to be continuing
6 to do that this coming summer. Those have
7 been fairly small-scale trials because of the
8 amount of seed that's available, but we've
9 been working with Dr. Goldstein and the
10 University of Minnesota on that.

11 We actually talked to them about
12 doing a small-scale trial with no Methionine
13 in the ration whatsoever, and they were
14 concerned about being able to get that through
15 the administration because of the welfare
16 issues, and the wellness of the birds involved
17 in that study.

18 We are -- also, I'm the primary
19 contact in contact with the private party who
20 I don't think would mind being mentioned, is
21 Dr. Joe Ward. He's on the Iowa State Organic
22 Board and he works for a private feed company.

1 He's developed a bacterial method to do
2 alternatives in Methionine. He's now entered
3 commercial-scale production trials of that,
4 and that will be the next stage, to see
5 whether he can really bring that to market.
6 He's very confident that at some point he'll
7 be able to, so we're each keeping it brief so
8 that we have time for a strong dialogue, so
9 thank you.

10 CHAIR DELGADO: Thanks.

11 MR. PIERCE: Good afternoon. My
12 name is Chris Pierce. I'm with Heritage
13 Poultry Management Services. We're East
14 Coast, we're in Pennsylvania. We are a
15 management consulting company that we have a
16 full-time poultry nutritionist on staff.
17 That's Dr. Owen Keene. He finished graduate
18 school at the University of Maryland in
19 nutrition in 1955, and Dr. Keene's is around
20 72 years old, and he's still going strong.
21 And he's made comment to you as board two
22 times during the last seven years as this

1 issue has come up.

2 And from our standpoint, as we work
3 with poultry, our first organic flock was in
4 1997. So as you remember that chart, as we
5 look at where we were in '97 and move to 2007,
6 we see a dramatic increase in the demand. But
7 we are committed to be part of the Methionine
8 Task Force, as we are only a small
9 representation of many producers around the
10 country that are trying to put the funds, the
11 resources together from our own companies
12 towards providing you the research. And from
13 my behalf, we do not take this issue very
14 lightly. We are committed, I think as you've
15 seen in David's presentation, that we are very
16 committed to serving and providing the answers
17 to the questions you may have.

18 MR. MARTINELLI: So we'll stop
19 there. And, obviously, if there's Q&A, I'd
20 like these folks maybe to come up, and to the
21 extent there's questions, engage -

22 CHAIR DELGADO: Okay. Questions?

1 Gerry.

2 MEMBER DAVIS: One slide you put up
3 on insects and earth worms mentioned
4 Methionine content was not exactly what you
5 need from them, but then you went to mention
6 the Neptune Industries. Are they selecting
7 certain insects that are different than that?

8 MR. MARTINELLI: I don't know the
9 exact answer. I suspect it's one of
10 concentration, that in a natural environment
11 the concentration of insects is not going to
12 be anything like the concentration in a meal
13 product, where it's going to be a higher
14 percentage of their diet.

15 MEMBER DAVIS: So that slide didn't
16 necessarily say the insect by weight is the
17 wrong component of Methionine. It's just the
18 ability to get enough insects, is the problem.

19 MR. MARTINELLI: Yes. I don't have
20 it with me. There's a chart -- I mean,
21 insects are probably three times the level of
22 the more typical ingredients you'd find in

1 feed from a Methionine standpoint. But
2 they're a fraction of what the benefit you get
3 from a full Methionine supplementation is. So
4 the idea is, in a normal diet, as a small
5 percentage of the diet in a free ranging
6 environment, you're not going to pick up
7 enough earth worms or insects to make a
8 difference. But if it's feed additive, you
9 probably could make -- it, in theory, could
10 make a difference. We really need to see the
11 nutritional profile to know.

12 MR. BRUCE: I would just add that
13 that's just one element that shows promise.
14 Again, there's going to be issues like feeding
15 fish meal at a certain level, you're going to
16 have offsets in flavor and that kind of thing,
17 so it's about a diversified source.

18 CHAIR DELGADO: Katrina, followed
19 by Kevin.

20 SECRETARY HEINZE: We're back to
21 Katrina's simple questions, don't know a lot
22 about chickens. But I want to ask a question

1 about the insects and earth worms, as well.
2 Again, this is a consumer perspective. I'm a
3 city girl, but my parents retired on a farm,
4 and my mom has ten, so again, it's not the
5 same amount, hens. And they go out in the
6 grass, they go out in the snow in the winter.
7 She gives them corn, eggs are fine, chickens
8 are fine. So what are the hurdles to be able
9 to do that on a production scale?

10 MR. MARTINELLI: I guess I'm not
11 really familiar with what -- how many she's
12 raising, or what she's trying to do. I'm not
13 familiar enough with that operation to really
14 tell you.

15 SECRETARY HEINZE: Okay. Well,
16 don't worry about my mom's.

17 MR. MARTINELLI: Okay.

18 SECRETARY HEINZE: For a long time,
19 people raised chickens, and they raised them
20 without Methionine.

21 MR. MARTINELLI: Right.

22 SECRETARY HEINZE: And people had

1 eggs.

2 MR. MARTINELLI: Sure.

3 SECRETARY HEINZE: And it worked,
4 so why doesn't it work now?

5 MR. MARTINELLI: We went back -- as
6 part of our petition, actually, there's -- we
7 pulled feed rations from the 1940s and 50s.
8 And, I mean, the typical additive in feed
9 rations were either table scraps, or some sort
10 of meat meal or bone meal. I mean, in
11 virtually all the diets you look at, that's
12 what you'll find. So there's some way of
13 getting that protein to the birds in the form
14 of a meat byproduct, which is relatively rich
15 in Methionine, and that's the compensating
16 difference.

17 MR. PIERCE: Can I just add to
18 that? Dr. Keene, who I mentioned earlier,
19 talks about the good old days, the 50s, and
20 40s when he grew up, and he talked about how
21 the mortality was significantly higher. The
22 life standard and the quality of the bird's

1 life was much more difficult because of those
2 elements with feathering and with mortality.
3 So as we see mortality -- maybe that's not an
4 answer. The consumer wants to know the
5 chickens are going to kill each other, so
6 that's something that's important to the
7 chicken, so the quality of life is much
8 different in the 50s than it is today in
9 regard to the chickens that are surviving.

10 CHAIR DELGADO: Follow-up question.

11 SECRETARY HEINZE: And, again, I'm
12 sure I'm seeing this from a very simplified
13 version. The only thing killing my mom's
14 chickens is the fox. They're not killing each
15 other. I don't think she's feeding them meat.
16 So it is -- I think from a consumer
17 perspective, there's an optics thing. Right?
18 That I can go -- big thing in Minneapolis is
19 the neighborhood chicken. Everyone is getting
20 chickens now that they can put in their
21 backyards, and let them run around in the
22 grass, so I think it's an optics thing. But

1 it's hard for consumers to understand, and it
2 gets complicated by pasture for cows. So
3 maybe some help understanding that.

4 MR. MARTINELLI: Yes. I don't know
5 that we can answer a consumer perception
6 question. I mean, that's not really -- I
7 mean, we're more from a nutritional standpoint
8 looking at NRC values, looking at our history
9 in poultry production, and we've actually got
10 speakers following us that actually can speak
11 very specifically to the science behind it.
12 I cannot. So, I mean, we can address those
13 issues, but consumer perception and optics is
14 kind of out of my league.

15 MR. BRUCE: Can I just add one
16 brief amendment to that, and that is that --
17 to reiterate that Heritage breeds don't have
18 different Methionine needs. But one of the
19 ways that that's been approached in Europe is
20 to have -- it's a density issue, and it's to
21 have much smaller flocks, and be able to move
22 the flocks around so they have a much greater

1 outdoor area. But what they found even in
2 those flocks is without supplementation
3 there's feathering problems, and picking, and
4 the feathering scores of those birds are
5 fairly poor.

6 CHAIR DELGADO: All right. Kevin,
7 followed by Tracy.

8 MEMBER ENGELBERT: You've touched
9 on one of the questions that I had for you,
10 but I'd like you to elaborate farther. Before
11 the advent of synthetic Methionine, how were
12 the needs of these birds met? And my second
13 question is, any of these trials that you
14 reference where the grass and these other
15 materials or substances weren't meeting the
16 Methionine needs of the birds, were they ever
17 fed synthetic Methionine as chicks, and then
18 taken off it and put into these trials? Do
19 you know that, because they could develop a
20 dependency on the synthetic, and then when you
21 put them out on a trial and say well, this
22 doesn't work, that could be the reason.

1 MR. PIERCE: I was going to say I
2 now it was, you could share part of it, but
3 from a diet standpoint, I know fish oil, fish
4 meal, crab meal was an important part of the
5 diet pre-synthetic Methionine to try to
6 elevate those levels. And I know some of
7 those products, of course, are not available
8 at this point to us, so maybe you want to add
9 to that.

10 MR. MARTINELLI: Again, that's
11 covered in the petition about the diets from
12 40, 50 years ago. I don't know the answer to
13 your question about whether the chicks were
14 fed synthetic Methionine. We've got the
15 report here. We can flip through it at the
16 break or something and look. I mean, it's a
17 great question. I just don't know.

18 CHAIR DELGADO: Tracy.

19 MEMBER MIEDEMA: Valerie, can you
20 pull up the slide that shows the quarter-by-
21 quarter projects. My question is for our
22 Livestock Chair, and maybe for you all to

1 chime in on.

2 I heard earlier that the reason we
3 put the, or were suggesting the two-year
4 expiration is to try to light a fire under the
5 development of non-synthetic Methionine. And
6 the indications I'm getting is that there's a
7 lot of irons in the fire out there, and so I'm
8 wondering, at the two-year point, where we're
9 going to be, and whether that's adequate.

10 CHAIR DELGADO: Hugh, would you
11 like to respond?

12 DR. KARREMAN: I don't know where
13 we're going to be, but they have a good time
14 line up there for doing a lot of trials, and
15 poultry trials don't take as long, usually, as
16 some of the other large livestock, so that's
17 helpful. The original petition is to take the
18 expiration date off indefinitely. Right? If
19 we did that, would you be doing this?

20 MR. MARTINELLI: It would still be
21 subject to the five-year sunset.

22 DR. KARREMAN: No. There's

1 something weird about that, I think, isn't
2 there?

3 MR. MARTINELLI: That wasn't our
4 intent, so if it's weird, we didn't mean to be
5 weird.

6 CHAIR DELGADO: He has a
7 clarification. Dan.

8 DR. KARREMAN: I do have some
9 questions about that whole thing, but is this
10 two-year time line kind of because of our
11 secondary recommendation here?

12 MR. MARTINELLI: In part. I mean,
13 I am sincere. I mean, I think part of the
14 problem is we haven't had a strong time line,
15 and we certainly haven't communicated it to
16 you guys. And, I mean, if you're going to
17 give us any time, we need to tell you what
18 we're going to do in that time, not just hey,
19 we're going to work really hard.

20 DR. KARREMAN: Right.

21 MR. MARTINELLI: So I echo what Dr.
22 Goldstein said earlier, that two years is a

1 bit of a rush. I mean, frankly, it's a bit of
2 a rush. We will do the things we're committed
3 to do up there, but I can't look you in the
4 eye and say yes, and we will have an answer.

5 DR. KARREMAN: Right. Right. No,
6 I understand that part. I just -- this is the
7 second extension on Methionine. Y'all know
8 that, or third, whatever it is. But we just
9 want to -- I guess, we just don't want to keep
10 having this discussion every two to three
11 years. I remember in 2001 when the meeting
12 was at the USDA building there was someone
13 really needing Methionine, and now it's 2008.
14 So, I guess, we just -- we want to make sure
15 that this isn't just an ongoing thing, and
16 that's why we're asking about alternatives and
17 all that.

18 And, actually, my question, if I
19 may is, what's the typical ration of layers,
20 typical ration that you're feeding with each
21 new batch of layers you get in?

22 MR. WILL: Depending on the age of

1 the bird, but our typical ration is the
2 majority of it is an organic corn, limestone,
3 alfalfa, natural salt, and soy. And then on
4 a per ton basis, it's around 4 pounds per ton
5 of Methionine.

6 DR. KARREMAN: That's pretty
7 standard around?

8 MR. BRUCE: It's fairly standard,
9 although I would just add to that by saying
10 that our producers are really experimenting
11 with a wide variety of things, field peas,
12 wheat, barley, everything that they could
13 think of because of the current livestock feed
14 situation.

15 MEMBER HALL: Just wondering,
16 though. I mean, if organics is to promote the
17 natural behavior of the livestock species, I
18 mean, poultry are not herbivores. I mentioned
19 that earlier this morning, I think, and I
20 think we'd like to get to that point. It's
21 like the whole pasture discussion is because
22 ruminants are herbivores, and they need to be

1 out there and whatnot. Well, poultry, it's a
2 little bit the other way, so we want to see
3 that -- I guess the Livestock Committee wants
4 to see that come in. I'm glad to hear there's
5 variety, but it's still all plant-based, and
6 I guess we want to start seeing some more
7 access to the outdoors, and perhaps some of
8 what Katrina was getting at, incorporated.
9 Not maybe basing all the Methionine on that,
10 but not denying them that particular input as
11 a Livestock Committee, and as a Board,
12 perhaps.

13 MR. MARTINELLI: Am I hearing you
14 right that it's -- so like the insect meal,
15 earth worm meal, that kind of stuff is the
16 direction you're going?

17 DR. KARREMAN: Well, I always like
18 to call things when I give talks to farmers or
19 vets, a multi-prong approach, not just
20 reliance on the same inputs, like the ration
21 that I just asked you about. So yes, you
22 know, have a variety.

1 MR. BRUCE: I couldn't agree with
2 you more, but we, nonetheless, have to address
3 the issue right now. I'd encourage the NOSB
4 to take up the issue of further defining
5 outdoor access for poultry, but, nonetheless,
6 we're on a long time line I'm sure with that,
7 too.

8 CHAIR DELGADO: Our Director has a
9 point to make. Please.

10 MS. FRANCIS: I just wanted to
11 remind the Board why they were concerned about
12 moving this material to a traditional sunset
13 rule versus keeping the expiration date, and
14 that the sunset rule puts more of the burden
15 on you to be soliciting whether or not this is
16 still needed. And keeping it on the list,
17 rather than putting the burden on the industry
18 to prove that they still need it.

19 CHAIR DELGADO: Thank you for that.
20 Dan, you had another similar comment? No.
21 Okay. Jeff. Hugh, are you done?

22 DR. KARREMAN: Yes.

1 CHAIR DELGADO: Okay. Do you have
2 a similar comment on that, or question? I
3 have Jeff here.

4 SECRETARY HEINZE: Jeff can go
5 first.

6 CHAIR DELGADO: Jeff, proceed,
7 please.

8 VICE CHAIR MOYER: Thank you, Mr.
9 Chairman. You mentioned in the beginning of
10 your conversation that, and your points that
11 you had some growers in the room. And I
12 appreciate their reluctance maybe to come to
13 the podium, but I would like to invite them to
14 come up and give their name, something about
15 their farm, briefly where they're from, just
16 so we have some indication of who is here
17 representing the poultry industry.

18 SECRETARY HEINZE: As you do this,
19 please go very slowly. I'm going to have to
20 write you all down.

21 MS. MITCHELL: Susan Mitchell. I'm
22 from Lancaster County, and we have been

1 growing organic chickens broilers for three
2 years.

3 VICE CHAIR MOYER: Are we allowed
4 to ask questions or not?

5 CHAIR DELGADO: Yes, we are. Why
6 don't we allow them to present themselves, and
7 then we'll have questions for them.

8 MR. ZIMMERMAN: Earl Ray Zimmerman.
9 I live in Lancaster County, I'm growing
10 organic broilers for four years. I'd like to
11 comment a little on grandma's backyard
12 chickens. Big issue is phosphorous for the
13 Chesapeake Bay.

14 CHAIR DELGADO: Excuse me.
15 Katrina, you had a question.

16 SECRETARY HEINZE: Before you do
17 that, can you spell your last name.

18 MR. ZIMMERMAN: Z-I-M-M-E-R-M-A-N.
19 If we'd all have 50 chickens in our backyard,
20 think how your backyard would look eventually.

21 CHAIR DELGADO: Okay. Thank you
22 for that. Comment, next?

1 MR. MARTIN: Dennis Martin from
2 Lancaster County, Pennsylvania. I've been
3 growing organic broilers for just about two
4 years now.

5 CHAIR DELGADO: Okay.

6 MR. STUMP: Lavere Stump from Adams
7 County. I've been raising, I put up poultry
8 barns a year and a half ago.

9 CHAIR DELGADO: Can you come back?

10 SECRETARY HEINZE: Spelling, again.

11 CHAIR DELGADO: Spell your name,
12 please.

13 MR. STUMP: My first or last?

14 SECRETARY HEINZE: Both.

15 MR. STUMP: Lavere, L-A-V-E-R-E.
16 Stump, S-T-U-M-P.

17 SECRETARY HEINZE: Thank you.

18 MR. KING: Matthew King, farm is in
19 Chester County. And we actually have our
20 first organic flock in the houses currently.
21 We've been raising chickens, I'd be the second
22 generation, broiler operation at this time, 13

1 or 15 years.

2 MR. RANK: My name is Ryan Rank.

3 I'm the Grow-Out Manager with BC Natural

4 Chicken. I'm not an actual farmer, but I'm

5 here with the farmers today. We have many

6 family farms represented with our operation

7 where we grow organic birds. So I just wanted

8 to give a general outlook on who we brought

9 with us here today.

10 CHAIR DELGADO: All right. Thank

11 you.

12 MR. FRAN: My name is Tom Fran.

13 I'm from the southern California, work for MCM

14 Poultry, and I have a Bachelor of Science in

15 Poultry from Cal Poly St. Luis, and 34

16 consecutive years in the layer industry.

17 CHAIR DELGADO: Okay. Thank you.

18 Any questions, follow-up questions -- one

19 more? Several more. Please.

20 MS. MILLER: Hi. I'm Denise Miller

21 with Dennis L. Miller farm. We've been

22 growing organic chickens for almost a year.

1 We're from Hamburg, Pennsylvania, Berks
2 County.

3 CHAIR DELGADO: Okay.

4 MR. SMELTER: My name is Steve
5 Smelter, and I work for Kramer Feed,
6 Incorporated in Kramer, Pennsylvania. We are
7 a certified organic feed mill, and we make
8 feeds for organic layers, organic broilers,
9 organic turkeys. And we sell feed both to
10 ourselves for our integrated growing program,
11 and we sell to independent growers for the
12 most part up and down the east coast from
13 Maine to Florida. I work in the retail
14 division, and have the experience, sometimes
15 quite strange experience of dealing with the
16 backyard grower like your mother. I'll come
17 off the phone with a grower who has five
18 chickens, and then I'll talk to some of our
19 large independent retail customers who have 30
20 or 60,000 layers, so kind of gives us a unique
21 perspective. But we've been doing this for 15
22 years now, so thank you.

1 SECRETARY HEINZE: Can you spell
2 your last name?

3 MR. SMELTER: Smelter, S-M-E-L-T-E-
4 R.

5 SECRETARY HEINZE: Thank you.

6 CHAIR DELGADO: Anyone else? Okay.

7 VICE CHAIR MOYER: I want to say
8 thank you. I appreciate you coming up and
9 giving us that information. It really does
10 put a face on the industry for us. And now,
11 I guess, it's up to you, whether the Board can
12 ask questions.

13 CHAIR DELGADO: Absolutely. Are
14 there any questions for our group of
15 producers, and also members of the Methionine
16 board?

17 DR. KARREMAN: I'm glad Lancaster
18 County and Chester County is well represented
19 here. Glad it wasn't a far drive.

20 I'm just wondering what -- I was
21 hoping to hear what kind of size bird houses
22 you have, and how much of your land is

1 certified organic with the farm that you have.

2 MR. STUMP: I've got, what is it,
3 88,000 - no, I started 96,000 birds. I have
4 four houses, and they do have access area on
5 organic rye grass. They can go out and they
6 have windows for natural light. And so yes,
7 we're trying to raise the most healthy bird
8 that we can.

9 SECRETARY HEINZE: Did you say your
10 name?

11 MR. STUMP: Laverne Stump.

12 DR. KARREMAN: You don't have to
13 all go through that, unless you want to.

14 MR. RANK: I can kind of speak for
15 the group a little bit. We have various
16 farms.

17 SECRETARY HEINZE: And your name?

18 MR. RANK: I'm Ryan Rank with PC
19 Natural Chicken, Coleman Natural Foods. We
20 have a variety of farm sizes, anywhere from
21 small houses to a few thousands birds, up to
22 large farms, which Mr. Stump just shared here.

1 Just give you kind of an overview of what we
2 do.

3 CHAIR DELGADO: Okay. Any other
4 questions from the Board? Dan, then Hugh.

5 MEMBER GIACOMINI: I'd like to go
6 back to the Task Force on a couple of issues.
7 I have a couple of different questions, if I
8 can. You indicated that in your typical diet,
9 you have about .2 percent Methionine inclusion
10 rate. What percent of the Methionine that
11 you're feeding is coming from synthetic
12 Methionine?

13 MR. WILL: That is our added rate.
14 There's a little bit in the feed that is on
15 top of that. But we add about four pounds of
16 synthetic Methionine to our ration.

17 MEMBER GIACOMINI: So then almost
18 all of -- are you saying then -- I mean,
19 you're not saying all the Methionine. I mean,
20 there's Methionine coming from other feeds.

21 MR. WILL: Correct.

22 MEMBER GIACOMINI: What percentage

1 of the Methionine in the diet is synthetic?

2 MR. WILL: About two-thirds.

3 MEMBER GIACOMINI: Okay. Valerie,
4 could you go to the, I believe it was a
5 pasture slide on the Mortiz study. I guess I
6 partly take exception to a statement you made,
7 that just in a general sense, faster growing
8 birds are healthier birds. That's kind of
9 like saying the fastest growing birds, or
10 anything that's not growing the fastest is not
11 as healthy as something growing faster. We
12 know in a general sense that slightly under-
13 feeding is the healthiest animal in a species,
14 so I take exception to that.

15 And in this study, it's looking
16 what a -- stating a deficiency in Methionine.
17 Is this based on the production level of the
18 birds in the study, or based on a preferred
19 growth level that they wanted to achieve?
20 Were the birds out-performing their Methionine
21 intake, or was it just less than what they
22 would have liked to see the birds perform?

1 Because Methionine requirement is directly
2 tied to the production level that you're
3 trying to assume, and the production level
4 comes down when the production level comes
5 down, and I'm going to come back, again, as I
6 started this question, disagree with your
7 statement that the healthiest birds in the
8 house are necessarily the fastest growing
9 ones.

10 MR. MARTINELLI: Well, I would
11 disagree with my own statement. If that's
12 what I said, it's not what I meant. The point
13 is that the slow growing genotypes don't
14 necessarily have any different Methionine
15 demand than the faster growing birds. And
16 what I meant to say was that the birds,
17 healthy birds are typically higher performing
18 birds. So yes, you will see an incidence of
19 higher performance out of birds that are given
20 supplemental Methionine, but it's our belief
21 that it's because the birds are healthier.

22 CHAIR DELGADO: Hugh, followed by

1 Kevin.

2 DR. KARREMAN: Last autumn, was it
3 last autumn, Tina? Tina and I were shown a
4 couple of poultry houses in our area, and I
5 was glad to get those tours, and learn a lot
6 from that. One thing I was a little worried
7 about, when one of the owners was there, I
8 just said well, how big is your farm? And he
9 said, 88 acres or whatever it is. I said,
10 certified. Right? No. It wasn't, and it
11 really was kind of shocking that these two
12 poultry houses were on not certified land. So
13 that would -- I think in agriculture, and
14 especially organic agriculture, you've got to
15 have a tie between the animals and the land.
16 That's the way it's always been, and that's
17 what we try to do in organics, I believe.

18 I'm not saying all the time out
19 there or anything, but I was like well, how
20 are those poultry birds going to be getting
21 their outdoor access as it is in 239(a), I
22 think? It's a little bit -- it was

1 troublesome. Do most of -- I'll just leave it
2 at that. Just wanted to make a statement.

3 CHAIR DELGADO: Okay. Kevin.

4 MEMBER ENGELBERT: I'd like to get
5 back to the point of healthy birds and their
6 productivity, and how you measure that. I
7 mean, are you looking at mortality rates, or
8 what do you use to judge -- what criteria are
9 you using to make that statement?

10 MR. MARTINELLI: Well, the criteria
11 we looked at, the measurable things we could
12 observe were mortalities, egg size, rate of
13 lay, bird weight, feed conversion, all those
14 sort of things, a variety of metrics depending
15 upon the bird. Obviously, there's also
16 observation that goes into it, too. And our
17 field people could tell if we have birds that
18 we either withheld methionine or gave them
19 less than the targeted amount of methionine,
20 they will tell you they can just look at the
21 birds and tell which group was the low-
22 methionine and no-methionine group.

1 MR. WILL: I just want to add to
2 this. We actually had an opportunity to walk
3 into poultry houses in first-time producers
4 about a month and a half ago, right after the
5 OTA, and these birds were about 40 weeks old,
6 and when we walked in, they were completely
7 featherless from the backs of their necks to
8 the vents. There were no feathers on the
9 ground. They had been picked clean, because
10 when we looked at the ration, these birds were
11 low in methionine. It was about 15 percent
12 low in the ration of methionine consisting
13 based in their ration. Their production was
14 excellent, but their health and general well-
15 being, the mortality was just starting to
16 shoot through the roof. They picked all the
17 feathers off. And we actually just in that
18 house for a short amount of time, actually saw
19 cannibalism happening because those birds were
20 having nutritional challenges.

21 CHAIR DELGADO: Kevin.

22 MEMBER ENGELBERT: Would the

1 concentration of birds in that house have any
2 impact on that? And did they have any access
3 to the outdoors?

4 MR. WILL: They had -- they were a
5 cage-free flock, so they did not have access
6 to the outdoors. However, they were not solid
7 walls, so they did have the environment
8 interacting with them. And their density was
9 at or above industry-accepted standard.

10 CHAIR DELGADO: Any other
11 questions? Dan.

12 MEMBER GIACOMINI: When we're
13 looking at a compound that's supplying two-
14 thirds of your requirement needs, I don't have
15 a chance to go through an exhaustive search,
16 but I just have -- as a nutritionist, I have
17 a database for amino acids on my laptop here,
18 and over the last couple of days, I've run a
19 number of feeds.

20 Even if we look at one of the more
21 enhanced versions of corn for Methionine being
22 a corn gluten meal, you'd have to look at like

1 a 200 time increase over conventional to get
2 anywhere close to the amount of Methionine
3 that you'd be supplying.

4 I'm trying to understand how --
5 that doesn't seem like it's going to be -- I
6 mean, it's going to help, but are you really
7 sincerely coming to us and telling us that you
8 think that in three to five years, between
9 corn -- I mean, you're going to have to have
10 exclusive processing centers, you're going to
11 have to have supply chains that will just be
12 incredible to manage, insects, a little bit of
13 fish meal, worms, or are just going -- or are
14 you going to come back, and are we going to
15 need Methionine forever to meet the production
16 levels that you really want with the health
17 that you're claiming that you need.

18 MR. MARTINELLI: That's an
19 extremely fair and legitimate question. For
20 boilers, when we looked at the diets, you get
21 really close with corn gluten meal, which is
22 not approved for organic production, but which

1 you cited, and high-methionine corn. I mean,
2 you get really close. And I guess my
3 perspective would be, I'd like to try that
4 diet and see what sort of -- see how the birds
5 look, see what sort of results we get. But I
6 think your question is great, because it
7 really illustrates -- I know there's a lot of
8 frustration around gosh, you've had three
9 years, you had another three years, you guys
10 aren't doing anything. And I don't -- it's
11 not that we're not doing anything, it's we've
12 got a tall order. I mean, what you're
13 describing is the crux of the problem. This
14 ain't easy, and it's -- we will do everything
15 we possibly can, but I can't deliver you a
16 two-years from now, 36 months from now we'll
17 have the solution.

18 MEMBER GIACOMINI: Well, I think
19 the crux of that problem is, on our side, at
20 least on my side, is very close to an absolute
21 commitment seeming to be on your part of
22 wanting to maintain conventional growth rates.

1 And there doesn't -- I'm not hearing a great
2 acceptance to well, we can come back 10
3 percent and we'll be able to do there, we'll
4 be able to do this, we'll be able to go so
5 many days longer, and this will make it work.
6 I'm just hearing chickens are going to be
7 killing each other if we don't keep our
8 Methionine.

9 I don't -- as a nutritionist, I
10 hope you keep trying, but I'm not really
11 optimistic on any of these for you. So,
12 granted I'm a ruminant nutritionist, not a
13 poultry, but I still know nutrition.

14 Are you going to reach the point
15 where if it -- I mean, we're just going to
16 have to live with a lower performance level,
17 production level?

18 MR. MARTINELLI: Yes. And I guess
19 I want to go back. I mean, you're completely
20 right. I mean, this is much more your realm
21 than mine. Closing the gap. So, I mean, if
22 we can get these alternatives in the system,

1 and we can close the gap, then if we get
2 results that are close, yes, we can live with
3 that. But right now you're talking about a
4 wide gap that creates bird health issues,
5 creates environmental issues.

6 The thinking would be if we could
7 get some of these alternatives in place and
8 get the gap to where at least we're not
9 dealing with bird health issues, we're not
10 dealing with environmental issues. You're
11 maybe dealing with a loss of production, but
12 you have to just manage your way through that.

13 CHAIR DELGADO: Hugh, followed by
14 Tracy.

15 DR. KARREMAN: Just taking that
16 into account, let's say in a few years you're
17 using the alternatives, and gee whiz, you
18 still need a little bit of methionine even for
19 a reduced level of production, which is our
20 problem right now, is just trying to keep
21 production. I'd like to ask the Program, is
22 it ever possible to say okay, synthetic

1 methionine, which is only for poultry, we're
2 not allowing it for pet food, or fish, or
3 nothing else. It's just poultry. If that can
4 be at a smidge, a fraction of what you're
5 doing now, if that would be allowable. Can we
6 say that, because it is a vitamin or essential
7 nutrient, but it's only for poultry. I was
8 wondering, could we have an annotation on
9 that? Let's say come up in three years or two
10 years, whatever, if this happens again, or
11 maybe work on that now. Just say you can have
12 it at whatever, like 15 percent of the level
13 you have it now, so that you are forced to use
14 some other inputs and have a diverse diet.

15 CHAIR DELGADO: So you're proposing
16 a scaled down -

17 DR. KARREMAN: Not a total phase-
18 out, necessarily. I'm just saying is that an
19 option of bringing it down, stepping it down
20 so then the alternatives have an incentive to
21 step up. That's what we're dealing with, fish
22 oil, fish meal from the symposium. We were

1 talking about a phase-out, so then the people
2 with the new products for fish oil, fish meal
3 will have stimulus to go up, because they know
4 you're coming down. Is that legal, being an
5 essential nutrient, well, because you're
6 supposed to balance the rations, vitamins,
7 minerals, and all that.

8 CHAIR DELGADO: Can a member of the
9 Program address that point?

10 DR. KARREMAN: An annotation to
11 have a certain amount, no more.

12 MR. POOLER: This is Bob Pooler,
13 NOP. We're going to have to take a look at
14 that and get back to you on it.

15 CHAIR DELGADO: Okay. Thank you.
16 But that's an option that probably the
17 Committee should consider. Kevin.

18 MEMBER ENGELBERT: There's a
19 nutritional supplement company in Pennsylvania
20 that I'm sure you're familiar with that offers
21 a poultry nutri-balance or supplement without
22 methionine. Can you give any opinion on that?

1 MR. PIERCE: Yes. Kevin, I'm not
2 familiar with -- I'm familiar with the company
3 I think you're talking about, but I'm not
4 familiar with that product, but we can include
5 that in the Methionine Task Force information.

6 MR. SMELTER: That product was
7 developed by Dr. Jack Robinette to -- was a
8 colleague of mine going back to 1980 when I
9 started in the feed industry. Jack had a
10 great understanding of all species, one of the
11 few nutritionists, I think, who could excel in
12 all those fields, and he's up there in his
13 elder age right now, but he's still providing
14 information to specific companies.

15 The nutri-balancer comes two ways.
16 It comes with Methionine, and without
17 methionine. And Jeff is not here from that
18 company to speak for it, but originally his
19 company, Fortrell, provided feed supplements
20 to the "natural grower" before the organic
21 program existed. When organics came, they
22 modified some of their pre-mixes.

1 The pre-mix with methionine is
2 chosen by people who wish to use it in their
3 birds, some of them wish to use the one
4 without methionine. Some of those are natural
5 growers who will use some other ingredients
6 that the organic program is not allowed to
7 use, so Fortrell has always had the natural
8 people, many of whom use fish, some might even
9 use meat and bone. Meat and bone hasn't been
10 mentioned, but historically in the 40s and 50s
11 that was the main carrier of methionine into
12 these poultry rations, was tankage, whey,
13 things that we call slaughter byproducts,
14 which are not allowed in organic production
15 today. So they do have both, and their pre-
16 mix without methionine would just be the
17 necessary vitamins and trace minerals, macro
18 and micro minerals that the bird would need.
19 So there would be a difference in how the
20 birds would be able to survive and perform.

21 MEMBER ENGELBERT: They make the
22 claim that they have replaced the methionine

1 with acceptable ingredients, one of which is
2 kelp meal. Do you know what the methionine
3 levels of that ration might be? And have you,
4 or any of your growers used this product to
5 compare the results?

6 MR. SMELTER: Well, as one of their
7 chief competitors, I've looked at it very
8 closely, and they would use that product to
9 grow all types of poultry, with some minor
10 modifications. For instance, for layers, they
11 would bring in some added calcium from
12 limestone or oyster shell to supplement that
13 out. I'm sorry. Oh, the kelp meal.

14 I know that Jeff has experimented
15 with recommending his organic growers to use
16 fish meal and crab meal, which is allowed
17 under organic rules, as long as the
18 preservative is okay. And he gets good
19 results, and he has -- in those
20 recommendations with no methionine, he'll use
21 have a fish and a crab recommendation. Kelp
22 is a great natural vitamin and trace mineral

1 source, but not a source of methionine, of any
2 significance, other than the tiny amount of
3 sea life, animal life that might be in it,
4 which is very negligible, and not really
5 claimed.

6 CHAIR DELGADO: I understand that
7 Richard Matthews has a statement that might
8 add to the previous question that you had.

9 MR. SMELTER: My name is Steven
10 Smelter.

11 MR. MATTHEWS: Richard Matthews.
12 Hugh, I'm going to go out on a limb, and
13 remind the board that in Section 205.602 for
14 sodium nitrate, that there already is a cap on
15 the amount of sodium nitrate that can be used
16 to meet the nitrogen needs, so why not in
17 livestock production, as well? So if you
18 wanted to say that synthetic methionine is
19 capped at a certain level, you can surely
20 propose that.

21 CHAIR DELGADO: Thank you.

22 MR. MATTHEWS: Granted, I'm talking

1 -- you know, it's already been done for a
2 natural which is restricted, but there's no
3 reason why you can't also restrict the
4 synthetic that you allow.

5 CHAIR DELGADO: Thank you for that
6 comment. Gerry, you wanted to comment on
7 that.

8 MEMBER DAVIS: That's a major
9 difference. That's a prohibited natural
10 that's restricted to that amount. It's not
11 synthetic.

12 CHAIR DELGADO: Hugh.

13 DR. KARREMAN: It's still on the
14 list.

15 MEMBER DAVIS: It's a similar
16 precedent, but it's synthetic versus natural.

17 DR. KARREMAN: Yes, but we're also
18 talking living creatures.

19 CHAIR DELGADO: Very well. So,
20 again, this is an option that the Committee
21 might consider, and explore that further.

22 Yes, Dan. You can a comment.

1 MEMBER GIACOMINI: Kind of another
2 question. Well, first of all, let me say as
3 far as the things -- I think the biggest help
4 that I would see is in the fermentation
5 products, because that's where you're going to
6 have the best chance of concentrating your
7 methionine. But has there been any work done
8 on finding an economical organically
9 approvable hydrolysis procedure and isolation
10 technique to isolate some of the methionine
11 out of some existing protein sources?

12 MR. MARTINELLI: No. I don't know
13 of any, let's put it that way.

14 CHAIR DELGADO: Follow-up question?

15 MEMBER GIACOMINI: No. I
16 understand it might be an idea.

17 CHAIR DELGADO: Okay. Thank you.
18 Tracy.

19 MEMBER MIEDEMA: I just wanted to
20 switch gears a little bit and go back to the
21 petitions that we have before us, which deal
22 specifically with the changing of this

1 expiration date, which the Livestock Committee
2 seemed to have made pretty strong
3 recommendation on. And a lot of what we were
4 dealing with was the date, and that we were
5 looking at two-year extension.

6 One of the things that you
7 mentioned earlier today was that two years was
8 arrived at sort of loosely based on it was
9 three, plus two, it's loosely tied to a
10 sunset-type period, and I'm just wondering,
11 since this is our only time to discuss this
12 and tomorrow we just vote. Right? We're
13 trying to confine our discussion to today.

14 CHAIR DELGADO: Right.

15 MEMBER MIEDEMA: If two years seems
16 like enough, given the amount of work that's
17 in the hopper right now, and where we're going
18 to be at in two years. And whether we're
19 going to go through this whole exercise just
20 to say add one more year, when we could
21 potentially just make it three.

22 CHAIR DELGADO: Okay. Hugh, if you

1 can answer that question, I really would like
2 to wrap this up and move on to the next topic.
3 So we'll have Hugh, followed by Joe.

4 DR. KARREMAN: Certainly, that's
5 possible. You've got to remember that the
6 Livestock Committee unanimously voted to not
7 take the petitioners recommendation or their
8 petition at all, meaning methionine would be
9 out this October.

10 MEMBER MIEDEMA: Okay.

11 DR. KARREMAN: We certainly do not
12 want to kill an industry, so we came up with
13 the two years, kind of like what you said with
14 these alternatives, and what's in the hopper
15 and all that. We could make it three years,
16 possibly, but I want to make sure that -- I
17 won't be on the board next time when this
18 happens, but that it won't happen again, that
19 another three years is needed. And, so, maybe
20 we can do something with a restricted amount,
21 a small amount of synthetic methionine,
22 possibly, to stimulate the growth of some of

1 these other alternatives into the diet, to get
2 some variety in the diet, as well, from the
3 natural sources of proteins and whatnot.
4 Anyway, it's possible for three years.

5 By the way, quick thing, Livestock
6 Committee meeting tonight at some point.

7 CHAIR DELGADO: We'll make that
8 announcement. And just as a reminder, there's
9 always -- prior to voting, there's a period of
10 comment on that specific item. And you'll
11 have more opportunities to comment on that.

12 MEMBER SMILLIE: I was simply going
13 to say the same thing. It seems two won't do,
14 meth free in three.

15 CHAIR DELGADO: That's it? Well,
16 any more questions? Thank you very much to
17 the group, and we'll continue on to the next
18 speaker.

19 MS. FRANCIS: The next speaker had
20 to leave to catch a flight, unfortunately, and
21 he has handouts, which I will pass around,
22 which are collated and everything. So I'm

1 assuming the next speaker is still here.

2 CHAIR DELGADO: And that will be
3 Greg Herbruck. Is that correct?

4 MS. FRANCIS: Eric Gingerich is
5 after -

6 CHAIR DELGADO: Okay. So we are
7 moving on. Greg is gone. Right, Valerie?
8 Greg is the one who left. Next up -

9 MS. FRANCIS: Greg left.

10 CHAIR DELGADO: Next up will be
11 Eric Gingerich.

12 MR. GINGERICH: That's right. Eric
13 Gingerich from the University of Pennsylvania.
14 I'm a veterinarian, and I have a handout that
15 you will all get eventually.

16 I've been in the industry about 30
17 years as a poultry veterinarian. I work in
18 the diagnostic lab portion at New Bolton
19 Center. We work with a lot of the Lancaster
20 County and surrounding area poultry producers,
21 organic, conventional, everything. So I'm
22 looking at these chickens, I do field

1 investigations, trying to figure out what's
2 going on with some of these flocks. And I've
3 seen some problems in the -- even present
4 problems with organic flocks.

5 I have about a list of nine
6 different things that I think could impact
7 poultry health, assuming that we have no good
8 alternative to synthetic methionine to add to
9 these rations. The first one is poor
10 feathering in egg layers. This is definitely
11 a big problem, even with conventional cage-
12 free birds, that once they lose their feathers
13 they lose a protective cover to protect them
14 from scratches, and things like that. These
15 wounds allow bacteria into the system. We get
16 E. coli infections quite often.

17 Also, once they lose their
18 feathers, they become very nervous and more
19 cannibalistic, and we get a lot of peck out
20 mortality. Even with present day organic
21 flocks, we've had some pretty high mortality
22 rates, especially in open-type housing from

1 peck outs, even with synthetic methionine in
2 the rations.

3 Another thing, poor feathering in
4 broilers is another thing that without the
5 synthetic methionine, we anticipate that we'd
6 have poor feathering problems there, also.
7 Broilers also need those feathers for
8 prevention of skin scratches, to prevent
9 gangrenous dermatitis, and E. coli infections,
10 as well.

11 Without synthetic methionine, the
12 rations are going to have a lot of excess
13 protein due to added soybean meal to raise the
14 methionine level trying to get near the
15 requirements, and this extra nitrogen is going
16 to go into the feces. And this extra nitrogen
17 is going to increase our ammonia levels in the
18 houses, and this will impact the respiratory
19 tract negatively. It reduces the ability of
20 the respiratory tract to rid itself of
21 bacteria. We're going to see more bacterial
22 infections.

1 Also, birds are very sensitive,
2 especially brown egg layers are very sensitive
3 to ammonia. They get corneal ulcers. We've
4 even had some -- this winter we had some
5 pretty significant losses of birds due to
6 corneal ulcers from high ammonia in brown egg
7 pullets.

8 Talk about decreased growth rate
9 with lower methionine rations. This, in a
10 veterinarian's eyes, you're going to have
11 these birds out in the field longer, broilers
12 and turkeys, by the way, going to have them
13 out in the field longer so that exposes them
14 to more disease risk. The longer they're out
15 in the field, the more risk they have.

16 Kidney problems could be an issue
17 also with the excess nitrogen that birds have
18 to excrete. This puts a big stress on the
19 kidneys, and we anticipate possibly more
20 visceral gout problems, urolythiasis problems
21 in poultry, especially layers due to the
22 increased amount of soybean meal that's going

1 to be used. This increases the potassium
2 level of the diet, and this potassium is very
3 prone to cause wet droppings. And these wet
4 droppings, wet litter in chickens is a very
5 bad thing. It increased pathogen load, it
6 increases the bacterial level of the litter,
7 it increases the ammonia release from the
8 litter, so it's got a lot of negatives to it.

9 Also, increased heat stress is a
10 possibility with increased nitrogen crude
11 protein in these rations, because of the heat,
12 the metabolism is going to be increased.
13 During real hot weather, we're going to have
14 some probably more heat stress, and mortality
15 due to heat-related problems.

16 Pododermatitis, which is ulcers on
17 the bottom of the feet of birds, this is --
18 some research has been done that shows a
19 significant increase in turkeys, where you use
20 higher levels of soybean meal, higher crude
21 protein levels. They didn't really say exactly
22 what it was due to, if it was the wet litter

1 issue with potassium or what, but there was a
2 big increase in foot problems.

3 Lastly, coccidiosis may be
4 increased. The severity of coccidiosis, some
5 research has been done that equated inadequate
6 methionine to increased severity of
7 coccidiosis.

8 So, in summary, I think without a
9 good alternative to synthetic methionine, I
10 think we're going to have some -- see more
11 birds in the lab due to some of these health
12 issues. Any questions?

13 CHAIR DELGADO: Questions for our
14 speaker? Okay. Thank you very much. Moving
15 on to Walter Goldstein, followed by Brian
16 Baker.

17 DR. GOLDSTEIN: Right. There's a
18 handout. I don't know if you've received it
19 yet. If not, it will be coming around. And
20 it will go more in depth into what I wanted to
21 say. If I only have five minutes, there's
22 only certain things I can deal with.

1 CHAIR DELGADO: Dr. Goldstein, can
2 you just state your name, and your
3 affiliation, please.

4 DR. GOLDSTEIN: Right. Walter
5 Goldstein, Research Director, Michael Fields
6 Agricultural Institute, East Troy, Wisconsin.

7 CHAIR DELGADO: Thank you.

8 DR. GOLDSTEIN: Okay. If we can
9 look at the screen over there, I have a few
10 slides for you. First off, I want to point
11 out that the work that we're doing is actually
12 a team effort that involves our institute,
13 Iowa State University Serial Testing Lab, USDA
14 ARS, especially the Corn Breeding Group at
15 Ames, Iowa, Practical Farmers of Iowa,
16 University of Minnesota, Lamberton, we're all
17 doing research. We're doing it also together
18 with Organic Valley and Methionine Task Force,
19 so it's a nice team effort.

20 Looking at the actual methionine
21 content, we've heard some discussion about
22 what needs to be in a ration. What I'd like

1 to point out here is that we have three
2 different types of corn here. This data is on
3 the basis of total dry matter, and you can see
4 normal corn, this is average of 1,903 samples
5 from the Iowa State Grain Testing Lab. And we
6 have 28 samples of our hard kernel methionine
7 corn, and 16 samples of our soft kernel
8 methionine corn. And you can see that there
9 are some profound differences. We have a
10 higher protein content. The methionine
11 content is about half again more. Also, the
12 total sulfur amino acid content, which counts
13 for chickens, is higher. And the lysine
14 content is higher. In fact, it's almost twice
15 as high for our soft kernel corn as it is for
16 normal corn. Lysine is also very important
17 amino acid for balancing the ration for
18 chickens.

19 And you can see that's an average
20 of 28 samples, and 16 samples. These samples
21 are expensive. For a company to do these
22 analyses, it costs them \$150 a sample. We

1 feel very excited that we've made a new
2 breakthrough in testing of methionine and
3 lysine with a near infrared spectroscopy.
4 We've developed a new calibration that's
5 broken the inherent correlation between
6 protein and methionine and between protein and
7 lysine. We've made a big breakthrough. And
8 with this technology, it's going to be
9 possible to measure methionine very cheaply,
10 and quickly. And that's going to be an
11 important ingredient in terms of bringing the
12 high methionine corn forward as an alternative
13 for organic producers. The grain handlers are
14 going to be able to need to test the corn, and
15 to see whether it's going to be meeting their
16 specifications in terms of methionine. The
17 next slide, please.

18 Okay. Here shows some yields.
19 These are yields from last year, from
20 Wisconsin, from Iowa, and from Minnesota with
21 the Lamberton Station. And you can see that
22 what we're looking at is three different

1 groups, and we're looking at the yields of
2 commercial hybrid checks, mostly three checks,
3 and our best three high methionine hybrids.
4 And if you look at that, you'll see that with
5 the hard kernel late group that we're
6 producing yields that are 90 percent of that
7 of the commercial hybrids. These are Blue
8 River hybrids. With our hard kernel early,
9 it's 80 percent of the same yield as the
10 commercial hybrids, for the soft kernel it's
11 70 percent. Soft kernel has the best
12 nutritional value, probably because of its
13 high lysine content, but we're sitting here
14 with our best hybrids, we're somewhere between
15 70 and 90 percent of the yields, depending on
16 the hybrid. So what we're doing is mostly
17 going forward in terms of seed production with
18 the hard kernel late time. Next slide,
19 please.

20 We've done feeding trials with
21 broilers. I should say that Organic Valley
22 has done, Nick Levendoski and his group of

1 farmers, a broiler feeding trial with Cornish
2 cross cockerels, small experiment. Birds fed
3 out from when they were chicks. This
4 experiment was simply to replace normal corn
5 plus synthetic methionine in a normal diet
6 with our corn, with our high methionine corn.
7 The gain was essentially the same. We also
8 had a third treatment, which was potato
9 extract, high methionine potato extract. It
10 did not perform. We had higher mortality, and
11 the birds did not grow as well.

12 The birds that received the high
13 methionine corn, and the birds that received
14 the normal corn plus synthetic methionine had
15 essentially the same rate of gain. Feed to
16 gain ratio was the same, but for the potato
17 extract it was higher. It wasn't as efficient
18 forage.

19 Do you want me to continue with
20 this? I can wrap it up in say three more
21 minutes? There's a layer trial.

22 CHAIR DELGADO: Just provide a

1 quick wrap-up sentence, please. And then
2 we'll open up for questions. Can you wrap-up
3 your comments, Doctor?

4 DR. GOLDSTEIN: I wanted to show
5 you a layer trial, which I think is very
6 pertinent to -- a 44-week layer trial. It
7 would take me about another minute on that.
8 And then I wanted to say where we are at in
9 terms of our seed production.

10 CHAIR DELGADO: Let's go on to
11 questions. Joe.

12 MEMBER SMILLIE: Dr. Goldstein,
13 could you tell us about a layer trial, and
14 where you're at with your seed projections?

15 DR. GOLDSTEIN: Okay. Next slide,
16 please.

17 CHAIR DELGADO: Thank you, Joe.

18 DR. GOLDSTEIN: Feeding trial was
19 a trial carried out by the University of
20 Minnesota together with Organic Valley and
21 ourselves. It took place with Bovar Brown
22 pullets, six replicated pens per treatment.

1 We had the same setup with normal corn, plus
2 synthetic methionine, versus our corn in the
3 context of a normal diet. The birds were fed
4 out from when they were chicks, and the gain
5 feed consumption was essentially the same.
6 Egg production was 2 to 5 percent less per pen
7 for the high methionine corn. However, there
8 were some other differences.

9 The birds that received the high
10 methionine corn were more enthusiastic about
11 their feed. They loved it. It had to be
12 controlled, because the birds liked it so much
13 that they would go into frenzies about it. By
14 the end of the trial, half of the pens with
15 the controlled feed had been progressively
16 disqualified because the hens were eating
17 their own eggs. This is for the controlled
18 diet, not for the high methionine corn, where
19 there was no problem on that. This is a
20 switch on the cannibalism issue.

21 Anyway, this interest in the high
22 methionine corn was also seen in the broiler

1 trial, and so that's what I have to report at
2 this point. Forty-four weeks, small flock,
3 essentially no differences in performance.

4 CHAIR DELGADO: Okay.

5 DR. GOLDSTEIN: Or feathering, for
6 that matter.

7 CHAIR DELGADO: Very good. Any
8 other questions? Gerry.

9 MEMBER DAVIS: Can you spell out
10 the progress of your seed increase program,
11 and particularly, I wanted to know, looking at
12 the chart from the Task Force that they put up
13 earlier on your plans, they had it laid out
14 quarterly. By the fourth quarter of '09, I'm
15 kind of curious to see what kind of volume
16 that represents, versus the percent in the
17 organic feed marketplace for the need that is,
18 what would be needed?

19 DR. GOLDSTEIN: Well, I think the
20 point is, is that we can make projections, and
21 it's important also to realize that real life
22 doesn't always follow through on them. But in

1 projections, and this handout, when you have
2 a chance to look at it, on page 6, we've given
3 projections of production for the two top
4 varieties that we're bringing back from Hawaii
5 this year, and which we're multiplying with
6 the help of the Methionine Task Force. They
7 paid for the seed, everything is going
8 forward.

9 And on that, you'll see that on
10 page 6 under 2010, we project that 3.1 million
11 bushels of corn could be produced at rather
12 conservative production assumptions for the
13 organic poultry industry by the end of 2010.
14 That is if everything goes right. And it has
15 been estimated that there is a total demand of
16 8 million bushels per acre.

17 MEMBER DAVIS: For organic.

18 DR. GOLDSTEIN: Organic poultry
19 over the whole nation. So that could be
20 accelerated by producing seed during the
21 winter in Chile in order to give a leg-up, or
22 the three-year -- the idea of extending the

1 two years to a three-year would give us a
2 little bit more leeway in case things just
3 don't go as well as we want.

4 There's a number of things that we
5 haven't resolved fully. As I explained
6 earlier, we're going as fast forward as we
7 can, and everything is looking positive, so
8 far. But there are -- some time will help us.

9 MEMBER DAVIS: So does the chart,
10 the information contained in this explain that
11 these numbers are based on winter time
12 production in Chile and things like that?

13 DR. GOLDSTEIN: No. These are
14 without wintertime production in Chile.

15 MEMBER DAVIS: These are without.

16 DR. GOLDSTEIN: Yes, that's -- the
17 last wintertime production would have been
18 this last winter. And now we're going forward
19 from now.

20 MEMBER DAVIS: So these numbers
21 are, if you did not do that, take those -

22 DR. GOLDSTEIN: That's right.

1 MEMBER DAVIS: -- extraordinary
2 measures of getting essentially two seed crops
3 a year.

4 DR. GOLDSTEIN: That's correct.
5 That's correct.

6 CHAIR DELGADO: Any other
7 questions? Steve.

8 MEMBER DeMURI: With the current
9 pressure on with corn production right now, do
10 you anticipate you'll have any problems
11 getting growers to grow this lower yielding
12 corn for the organic poultry industry?

13 DR. GOLDSTEIN: Yes, that's a very
14 good question. I do anticipate we will have
15 problems. I do anticipate, because farmers
16 are going to be trying something new, and
17 because what's not in place now is a price
18 incentive system which is clear. We need to
19 have outreach, we need to have a clear set of
20 contracts, and that all needs to be developed.

21 CHAIR DELGADO: Any other
22 questions? Dan, followed by Jennifer.

1 MEMBER GIACOMINI: When we're
2 looking at something like corn, and we're
3 trying to deal with something like methionine,
4 where we're talking about something basically
5 plus or minus, a 10 percent protein level, we
6 can improve methionine, but we're still
7 talking about small amounts, unless we do
8 something to that corn to process it to
9 concentrate the methionine and the protein.
10 Is your company looking at any processing
11 possibilities to make this a little more
12 utilizable, and work into the ration?

13 DR. GOLDSTEIN: Could you go to the
14 next slide, please. Sorry. The next one
15 after that. I'd like to emphasize that
16 actually I don't think that's necessary, not
17 for broilers and layers, at least that's not
18 what our results are showing, that it's
19 necessary to concentrate the feed.

20 Cromwell in '68 and Chee in '73 did
21 trials with the same floury to corn that we
22 have with layers and broilers. They had the

1 same results. It's possible, I believe, to
2 feed corn with organic, not necessarily
3 natural, organic corn, and to be able to get
4 adequate production levels. I think that's
5 what the life has been showing us, so I'm not
6 sure that that assumption is actually true in
7 reality.

8 MEMBER GIACOMINI: Okay.

9 CHAIR DELGADO: Okay. Jennifer is
10 not asking a question. Anybody else? Okay.
11 Well, thank you very much.

12 DR. GOLDSTEIN: Sure.

13 CHAIR DELGADO: Appreciate your
14 comments.

15 DR. GOLDSTEIN: Yes.

16 CHAIR DELGADO: Next up is Brian
17 Baker as proxy for Dave DeCou, and after that
18 is Katherine DiMatteo.

19 MR. BAKER: Thank you, Mr. Chair,
20 members of the NOSB, members of the NOP. I
21 appreciate this second opportunity to comment,
22 and I will try to get straight to the point.

1 OMRI appreciates the recognition of our work
2 on the database, if you could back up to that
3 slide.

4 We conducted a survey of accredited
5 certifiers to find out how they were verifying
6 commercial availability, and we found, as many
7 of you are aware, that none of them are
8 following the NOSB's recommendations. They're
9 using supplier letter seed catalogues as their
10 main references.

11 OMRI comes in behind producer logs,
12 around half of the certifiers are using it.
13 We wanted to know how to improve that, and we
14 also asked what's out there. Anyone want to
15 guess what the number one crop that certifiers
16 said that they were saying their producers had
17 a hard time finding organic seed?

18 PARTICIPANT: Corn.

19 PARTICIPANT: Okra.

20 MR. BAKER: You got it, yes. And
21 there's a reason alfalfa -- alfalfa is the
22 answer. You want to go to the next slide,

1 please. Alfalfa, a lot of people don't
2 realize that alfalfa is really sold into two
3 markets, and we think of hay, and the run up
4 in demand for hay because of the increased
5 dairy production, but there's also a vegetable
6 market. And seed for sprouting is not allowed
7 to be exempt, so alfalfa spout producers have
8 still be able to find organic seed, but
9 they've had to pay quite a bit of money to
10 keep that going.

11 And we found out this past spring,
12 we've been very pleased to say, and surprised,
13 actually, that we're getting as many hits on
14 our seed database as we were getting on our
15 products list. And the thing that -- we've
16 also noticed that we're getting a lot of hits
17 on corn, and a lot of concern over the ability
18 to get uncontaminated -- get corn seed that's
19 not GMO contaminated.

20 Briefly, we've talked to
21 individuals at FIBL, Soil Association, the
22 Danish Ministry of Agriculture in the

1 development of our database and there are
2 limitations to adopting the European model
3 that would require changes in the way seeds
4 are regulated in the United States. And, so,
5 yes, the European Registry has certain
6 advantages, but that's a very different mind
7 set that they have, and how seed is regulated,
8 and what varieties are out there for farmers
9 to grow, so I caution against mandating a
10 European-style approach, without an
11 understanding of how that's connected to how
12 seeds are regulated in Europe. Switching over
13 to the other commercial availability issue,
14 the allowance of agricultural ingredients in
15 organic processing and handling creates some
16 interesting challenges in inspection and
17 labeling. Under OFPA, items that contain less
18 than 70 percent organic ingredients are exempt
19 from certification. And under 7 CFR
20 205.101(c)(3), that exemption is carried
21 forward in the regulation.

22 Now guess whose door people knock

1 on when they want to get their non-organic
2 agricultural ingredients certified for use in
3 organic production? Okay. So the ACAs don't
4 want them. We're aware that not only colors,
5 but also anti-foaming agents, flavors, fruit
6 coatings, these things are coming to us, and
7 they're formulated with items on 605A and B,
8 items on 606, and organic agricultural
9 ingredients, less than 70 percent organic
10 agricultural ingredients.

11 We're getting mixed messages from
12 subscribing certifiers in the industry about
13 what we're supposed to do to gather, verify,
14 and communicate information on these products
15 that are clearly ineligible for organic
16 certification. Specifically, how are people
17 supposed to know the organic content of these
18 non-organic ingredients, or should they just
19 assume none of it's organic?

20 We also have to deal with the fact
21 that organic claims and the labeling of such
22 intermediate BtoB products are covered under

1 305 and 310. And the vendors want to keep
2 this specific information proprietary. They
3 don't want their customers to know it. They
4 don't want certifiers to know it. They don't
5 even want us to know it, but we'll get it.
6 And then we don't know what to do with it, so
7 we need guidance. We need help.

8 That's something where we're asking
9 for your assistance, and we're also asking
10 that the information -- that the increased
11 funding for data collection be used to
12 estimate the market for organic seed and non-
13 organic agricultural ingredients, and I'd be
14 willing to answer questions on tartaric acid
15 and methionine.

16 CHAIR DELGADO: Okay. Any
17 questions? Katrina.

18 SECRETARY HEINZE: I want to make
19 sure I understood that list bit right.

20 MR. BAKER: I was trying to get it
21 out in less than five minutes.

22 SECRETARY HEINZE: I know. You're

1 getting questions about the non-organic
2 materials being used in products labeled as
3 made with, so ones that are below 95 percent
4 and above 70?

5 MR. BAKER: No. We're getting
6 formulated products that are combinations of
7 non-organic agricultural ingredients on 606,
8 non-organic non-synthetic ingredients on 605A,
9 non-organic synthetic ingredients on 605B, and
10 organic agricultural ingredients that are
11 combined in formulations that are, in turn,
12 used in organic products that have over 95
13 percent organic content, and they want to sell
14 these formulated packages to organic
15 processors or packers. I mean, fruit
16 coatings, what do you do with fruit coatings?
17 You've got five ingredients in a fruit
18 coating, and it's a black box. The company
19 that formulates it doesn't want the packing
20 house to know the specific ingredients or the
21 percentages. And the fruit packer wants to
22 sell their fruit as organic. Heck, they'd

1 like to sell it as 100 percent organic, but
2 it's not 100 percent organic if it has a non-
3 organic coating that includes shellac and an
4 organic vegetable oil. And I don't want to
5 give the whole formulation away.

6 SECRETARY HEINZE: Thank you for
7 clarifying.

8 CHAIR DELGADO: Okay. Joe.

9 MEMBER SMILLIE: Has OMRI been
10 working with the other seed databases that
11 we've heard about?

12 MR. BAKER: Yes, we have. We've
13 worked with the Organic Seed Alliance, and are
14 very complementary to their's. We've talked
15 extensively with Cricket Rakita, and Save our
16 Seeds at the Organic Seed Conference. We were
17 on a panel together. We think that there need
18 to be multiple portals, and we don't want to
19 see a single database. We want to see a
20 diversity out there. I mean, our community
21 thrives on diversity.

22 CHAIR DELGADO: Dan.

1 MEMBER GIACOMINI: Can you add
2 anything of historical memory to the Tartaric
3 Acid, A-B. If we're looking to make a
4 technical correction, and we're going to make
5 a request, I want to make sure that -- I want
6 to increase the chance that we're getting it
7 right. And, also, then knowing what we're
8 voting.

9 MR. BAKER: Yes. Thank you for
10 asking. I was one of the advisors to the
11 National Organic Standards Board at the
12 November 1995 meeting in Austin, Texas, where
13 that was discussed. I pulled up the Minutes
14 and what notes I could find, and the -- my
15 recollection, having been there, was that the
16 industry felt strongly that they needed to
17 have all available sources of Tartaric Acid,
18 all sources of Tartaric Acid available to
19 them, including those made from synthetic
20 sources. There was no distinction between the
21 L and other isomers of Malic Acid as being the
22 source.

1 That was a split vote to allow the
2 synthetic from all sources, but you have to
3 remember two things. One is that at that
4 time, the NOSB was operating under the
5 assumption of organic preference. If organic
6 was available, you had to use it. If it
7 wasn't available, you had to use the natural.
8 If the natural wasn't available, only then
9 could you use the synthetic, and so you had
10 this assumption that orders of preference
11 would be in the rule, and it would
12 enforceable.

13 That fell out in 2000, five years
14 after that recommendation was made. The
15 second thing was that there was an assumption
16 that the sunset process would take care of a
17 lot of these substances that were
18 controversial, and where there were split
19 decisions. And that as the organic industry
20 grew, these sources would become available,
21 and the sunset process would take them off.

22 CHAIR DELGADO: Kevin.

1 MEMBER ENGELBERT: Hi, Brian.
2 Would you repeat again what your objective is
3 with this, for example, the coating you gave
4 and trying to call a product that's been used,
5 have these 605s, 606s all put together. What
6 exactly, again, do you want from the Board in
7 that regard?

8 MR. BAKER: I think the most
9 important thing is making sure that people
10 have the information that they need in order
11 to make decisions as to whether a given
12 ingredient will meet the organic standards.
13 So if it has a 606 item, it is very difficult
14 for us to understand how the user of that
15 ingredient will be able to assess commercial
16 availability if that item is not conveyed to
17 the processor, or the certifier. And that we
18 think that 305 and 310 need to recognize that
19 items that are agricultural and non-organic,
20 and on 606, need to appear on the label. And
21 I don't know if we can go so far as to say
22 that the percentages of organic and non-

1 organic ingredients need to be declared. But,
2 obviously, if you assume that the organic
3 agricultural ingredients in this formulated
4 product don't count as organic, then that's a
5 conservative approach that insures compliance.
6 Does that make sense, or is it -- yes. People
7 need to know what they're getting.

8 CHAIR DELGADO: Any other
9 questions? Julie.

10 MEMBER WEISMAN: I just want to go
11 through this one more time to make sure. I
12 want to phrase it a different way. So what
13 you're saying is that there -- certain 606
14 items are making their way to processors, but
15 their presence in the formulations that the
16 processors are buying is currently hidden by
17 the manufacturers.

18 MR. BAKER: Right. It's considered
19 proprietary by the manufacturer, and they want
20 -- and the ability of OMRI to require them to
21 disclose that information to the processor and
22 to the certifier of that processor is being

1 challenged.

2 MEMBER WEISMAN: Can I continue?

3 CHAIR DELGADO: Follow-up, yes.

4 MEMBER WEISMAN: So that because
5 the product that's being sold to the processor
6 is not being sold as organic, it is not being
7 subjected to any scrutiny.

8 MR. BAKER: Plant is not inspected.

9 MEMBER WEISMAN: And the person who
10 holds the certificate for the organic product
11 that it's going into, has no idea that there's
12 an ingredient in there where there's a burden
13 to source it organically.

14 MR. BAKER: That's correct.

15 MEMBER WEISMAN: Okay. I got it
16 now.

17 CHAIR DELGADO: Okay. Dan, then
18 Gerry.

19 MEMBER GIACOMINI: I'm going to
20 jump around, I guess, a little. We'll jump
21 around a little bit, I guess, here. I want to
22 go back on Tartaric Acid. In your review of

1 products, can you give us any insight into
2 what you see as A form, B form, or anything
3 along those lines?

4 MR. BAKER: Well, yes. I was a big
5 fan of order of preference. I mean, if it's
6 available organic, then it should be used from
7 organic sources. The annotation that was
8 proposed in '95 required that it come from
9 grapes, the 605A version come from grapes.
10 Now, I've been in plenty of organic vineyards,
11 and I know a little bit about how Tartaric
12 Acid is made, so I'm told there's organic
13 Tartaric Acid on the market. But, again,
14 we're put in a position where there's
15 something that's on 605A as being non-
16 agricultural when it comes from grapes.

17 MEMBER GIACOMINI: But of the A
18 versus B form that we do have in the rule now,
19 what are you seeing in products that you're
20 reviewing?

21 MR. BAKER: We're seeing both. And
22 it's not just cost-driven, it's quality-

1 driven, and there are certain technical and
2 functional requirements, but it's more often
3 the non-synthetic form that is the higher
4 quality, what we've been seeing. And, again,
5 I have to defer, in part, to our Advisory
6 Council Members. They've done more of that
7 work than I have.

8 CHAIR DELGADO: Gerry. Any other
9 questions? All right. Thank you very much,
10 Brian.

11 MR. BAKER: Thank you.

12 CHAIR DELGADO: Next is Katherine
13 DiMatteo, and then after her we'll have David
14 Bailey.

15 MS. DiMATTEO: Hello. Katherine
16 DiMatteo, Senior Associate, Wolf, DiMatteo &
17 Associates. And I'm giving up my Wolf,
18 DiMatteo & Associates time to read a letter
19 from one of our clients, Blue River Hybrids.

20 "Dear NOSB Members: Thank you for
21 the opportunity comment today. In addition to
22 the comments that Blue River submitted through

1 regulations.gov, on the recommendation on
2 commercial availability of organic seed, I
3 would like to add a personal experience to
4 demonstrate how the current lack of
5 enforcement of the NOP requirement to use
6 organic seed impacts an organic business.

7 Within the past month, Blue River
8 Hybrids has had 481 bags of organic corn seed
9 returned from our dealer in the upper Midwest.
10 The value of this returned seed is \$62,193.
11 The seed was from three hybrids, all of which
12 were capable of good performance in the area,
13 and the seed was shipped in a timely way,
14 ready for delivery to organic farmers to plant
15 this season.

16 Why was the seed returned? Because
17 the organic farmers in the area told our
18 organic dealer, who is also an organic farmer,
19 that they would be allowed by their certifiers
20 to plant conventional seed. This seed was
21 being reserved for use by these customers, and
22 because of the lateness of this decision, Blue

1 River lost the opportunity to sell this seed
2 to other farmers. Had this decision been made
3 in February, we would have sold the seed to
4 other organic farmers wanting seed for these
5 hybrids.

6 I understand that accredited
7 certifiers, the NOSB, and perhaps even the
8 NOP, do not want to impose undue burden on
9 organic farmers who may already struggle to
10 make a living farming, as well as complying
11 with the NOP rules, and the paperwork
12 requirements of certification. But organic
13 seed is grown by organic farmers, and their
14 livelihood and mine are just as precarious,
15 and the requirements of NOP just as
16 burdensome.

17 The NOSB recommendation that you
18 are amending has been in place since 2005. In
19 that time, the organic seed industry has
20 grown, and the availability and the use of
21 organic seed has increased, but the prevalent
22 attitude among farmers and certifiers

1 continues to be that using organic seed is the
2 exception, rather than the rule.

3 I believe there is more that can be
4 done to verify that farmers seek available
5 sources and use organic seed, and that
6 certifiers enforce the use of organic seed as
7 required by the NOP rule.

8 Better guidance about how to
9 determine commercial availability and
10 equivalent varieties is needed in your
11 recommendation. Clear and coherent
12 explanations of why an organic variety is not
13 sufficient, must be provided by the farmer,
14 and kept on record by the certifier.

15 The accredited certifiers should be
16 held accountable for their decisions on the
17 availability and use of organic seed during
18 the audit by the National Organic Program.
19 And, as a resource, a National List of
20 available seed must be developed under the
21 supervision of the USDA, National Organic
22 Program, similar to the organic feed grain

1 producers and handlers list which is currently
2 available on the NOP website.

3 As the largest certified organic
4 field corn seed supplier in the United States,
5 the implementation of effective protocols is
6 of vital importance to our company, and to the
7 integrity and growth of the organic industry.
8 Thank you very much. Maury Johnson, Director
9 of Production and Sales."

10 CHAIR DELGADO: Okay. Thank you.
11 Any questions? Joe.

12 MEMBER SMILLIE: Do you have
13 personally any comments to make on the
14 recommendation on seed availability,
15 commercial availability?

16 MS. DiMATTEO: I think that there's
17 a number of things about the recommendation --
18 the amendment doesn't go far enough to really
19 make -- produce any incentives, or to really
20 create any more information that's already
21 been around since 2005. Like Maury said in
22 his letter, the current recommendation has

1 been around, and we're amending it -- and
2 you're amending it in ways -- you're making
3 progress. I think that there's just more to
4 be done. And I don't like the idea of in a
5 recommendation mandating a non-governmental
6 organization as the source of where
7 information is going to be provided. And I
8 think that that can cause a lot of problems,
9 both for the people providing the information,
10 and for people accessing the information. And
11 I most definitely think for the certifiers,
12 and for the National Organic Program to do
13 that kind of thing.

14 I would hope that with the
15 additional money that NOP has, that maybe some
16 of this information can be available. And
17 they've done it once, as Maury has pointed out
18 in his letter, by having the feed grain
19 producers and handlers database on their site.
20 So perhaps that can be another way to at least
21 provide a resource for people looking for
22 seed.

1 And we've discussed it both as
2 Wolf, DiMatteo & Associates, and with our
3 client, Blue River Hybrids, about whether to
4 ask you if you could have different protocols,
5 or more emphasis on commodity seeds, like corn
6 and soybeans, which are readily available in
7 different forms and varieties that can be used
8 in organic farms, versus the problem with the
9 vegetable seeds.

10 I realize there's different levels
11 of ability to be able to comply with this
12 organic seed requirement, but we never could
13 come up with an idea of what to suggest, so we
14 haven't posed that. That just would add one
15 more kind of imbalance to the whole system.
16 So, basically, I haven't looked at what's
17 being done in the EU. I know that there's
18 some problems with their database system, but
19 I also think that it has provided some
20 incentive to use more organic seed, and for
21 seed suppliers to go ahead and develop new
22 varieties so that they can get posted on those

1 databases, and show that they're available.

2 CHAIR DELGADO: Thank you. Any
3 other questions? Well, thank you very much.

4 MS. DiMATTEO: Thank you.

5 CHAIR DELGADO: At this point,
6 we're going to take a quick 5-minute break.
7 We have nine more speakers, and I know several
8 of the Committees have to do some work and
9 homework, so I'll ask the Board Members to
10 stay close, and we'll start in five minutes.
11 Next up after our break will be David Bailey.

12 (Whereupon, the above-entitled
13 matter went off the record at 5:37 p.m. and
14 resumed at 5:46 p.m.)

15 CHAIR DELGADO: And I'm glad to
16 hear that someone recognizes what we're
17 talking about. Thank you so much, Mr. David
18 Bailey.

19 MR. BAILEY: Good afternoon, Mr.
20 Chairman. Thank you, and fellow members of
21 the Board, and members of the NOP, at least
22 those are still here. My name is David

1 Bailey. I am here representing Small Planet
2 Foods, which is the organic division of
3 General Mills. And I'm here to speak about
4 the okra petition, which has my name on it.

5 We did submit that to add it to
6 Section 205.606 of the National List. Most of
7 my points that I'm going to hit right now were
8 mentioned earlier in previous discussions, so
9 bear with me as I just kind of hit them again.

10 First, critical. I want to repeat
11 that our petition is not for okra in a blanket
12 sense. Somehow, and I don't know how, the
13 IQF, the Individually Quick Frozen annotation
14 or whatever you want to call it was dropped,
15 and I think that's caused a lot of the uproar
16 and whispering I'm hearing. So I don't know
17 what you need to do to make sure that that
18 gets on before you bullet, but I just wanted
19 to point that out, and why? Because that
20 distinction between the fresh and frozen is
21 critical for a petition.

22 We have never denied the existence

1 that there's organic fresh okra out there.
2 The basis for our petition is that for over a
3 year now we've been looking for it. We've
4 been looking for frozen okra. We have an
5 application which we want to use it. The
6 frustration is not shared -- I mean, it's
7 shared by us. We've been looking quite hard
8 for it, too. And we would have found it,
9 obviously, we would not have filed the
10 petition.

11 We haven't been able to find it at
12 a reliable processor. And one of the big
13 issues, obviously, again, hit on earlier is
14 perish-ability. The application which we want
15 to use it makes it impossible for us to
16 harvest fresh okra, transport it to our plant,
17 because it doesn't travel well, as was, again,
18 said earlier. And the window of production
19 that we would have to make the product would
20 be so small, if it would even exist at all,
21 very difficult to do.

22 I also want to stress that we want

1 to make sure a source is obviously steady and
2 reliable. And we are committed, again, we're
3 committed to buying an Instant Quick Frozen
4 okra as soon as one is available.

5 We have a sourcing group that's
6 been working on this, like I said, for over a
7 year. Their efforts are continuous. At the
8 time we submitted the petition, none of the
9 processors we contacted had seen nor heard of
10 organic frozen okra. Since that time, I can
11 contribute that we have seen some leads
12 emerge, and I call them leads only because
13 upon further digging, none of those have
14 panned out, unfortunately, so we press on with
15 this petition.

16 Often what we're getting back from
17 processors regarding their -- either their
18 reluctance or their inability to meet a
19 request to freeze their organic okra, is a
20 combination of a few factors. And, again,
21 most of these have been brought up a short
22 time ago in discussion.

1 Okra fields are not harvested in
2 one clean shot. The pods have to be picked
3 over a series of days as they ripen, so in
4 that case, the volume that you need has to be
5 amassed over a period of time. Again, the
6 fresh okra is highly perishable. So point
7 three is that freezers need a significant
8 volume of products in order to make a minimum
9 run happen. And to do that, just to get that
10 minimum amount they're going to need a fairly
11 large amount of acreage of organic okra to
12 amass that volume quickly enough to avoid
13 spoilage of the okra.

14 Consequently, right now our volume
15 needs do not justify what they would need to
16 make a minimum run. That's what they're
17 telling us. So, again, I want to reiterate
18 that we are committed to buying it as soon as
19 it's available. Again, as soon as a reliable
20 source is available. And I just want to thank
21 you for the opportunity to address this with
22 you.

1 CHAIR DELGADO: Before we move on,
2 so we do have to make that clarification on
3 the petition, as the petitioner has clarified
4 to -- requested to add IQF into that petition.
5 Is that correct?

6 MEMBER WEISMAN: Yes. It is my
7 intent. That was an oversight. It is my
8 intention when the motion is made tomorrow to
9 include that. Is there anything procedurally
10 that I would need to do before that?

11 CHAIR DELGADO: No. When you make
12 the motion, as you stated, you will clarify
13 that.

14 MEMBER WEISMAN: Okay.

15 CHAIR DELGADO: And it's on the
16 record that the petitioner requested that.

17 Okay. On that note, let's proceed
18 with questions. Jeff. Program, yes.

19 MS. FRANCIS: You just said that
20 you don't need to modify it, but actually in
21 your Committee, you need to have a -- are you
22 just looking at it as a typo, or is this --

1 are you going to motioning on the Committee
2 level before the Board vote? If it's going to
3 come to you -

4 CHAIR DELGADO: It will come to the
5 Board with IQF added to it, and you are
6 absolutely right. It will have to be handled
7 at the Committee level to make that change.

8 MEMBER WEISMAN: Okay. Well, HC
9 wants to get into the queue for a Committee
10 meeting tonight.

11 CHAIR DELGADO: Very good. Okay.
12 And we'll start with -- we'll continue. Thank
13 you for that, and we'll continue with Joe.
14 Jeff.

15 VICE CHAIR MOYER: I don't know
16 much about what you're going to be using the
17 okra for, or how that all works out, but we've
18 heard several people talking from southern
19 locations that say they have the okra, or
20 certainly could step up and produce okra. And
21 they do have access to freezer plants. Have
22 you checked in those regions, or what is -

1 MR. BAILEY: Personally, I haven't.
2 If they have access to a freezer, we're all
3 ears. I'd love for them to step up and give
4 me a card.

5 VICE CHAIR MOYER: Okay. Thank
6 you.

7 CHAIR DELGADO: Any other
8 questions? Joe.

9 MEMBER SMILLIE: Could you walk us
10 through how -- you're saying that you are in
11 the market to buy frozen IQF okra. But you're
12 also -- your infrastructure and your
13 capabilities is, you would be able to contract
14 growers to grow that for -- are you asking the
15 IQF processor to not only freeze the okra, but
16 also find it, locate it, and manage it, or are
17 you more involved than that in the process?

18 MR. BAILEY: We can be more
19 involved in the process. The potential is
20 there.

21 MEMBER SMILLIE: So if a group came
22 to you and said this IQF freezer guy will do

1 this job for us. You would contract with the
2 growers, or would you say hey, we'll buy the
3 frozen, but you've got to do all the
4 contracting and the ag work?

5 MR. BAILEY: I should clarify. We
6 probably could help him. Okra is not one of
7 our ag department specialties that's in our
8 division. I'm sorry. I'm going to ask you to
9 repeat the second part of your question.

10 MEMBER SMILLIE: Well, the fact of
11 another HC meeting today has actively floored
12 me, but I'm going out to eat first. But I
13 guess the question was how involved will you
14 be in the process? Are you just saying we
15 want to buy frozen IQF okra, or are you saying
16 that if there's a freezer in a group, you're
17 willing to step in and contract that acreage,
18 or do you demand that the IQF facility do
19 that?

20 MR. BAILEY: At this point, we are
21 demanding the IQF facility do that.

22 MEMBER SMILLIE: I've got another

1 question. We're only talking about 5 percent,
2 so your product is going to have 5 percent or
3 less, probably less, because there may be
4 citric acid or something else in the product
5 that needs that 5 percent, too. So the
6 product you're making, is 5 percent enough to
7 utilize the wonderful talents of this
8 wonderful vegetable?

9 MR. BAILEY: The mucilaginous
10 properties?

11 MEMBER SMILLIE: There you go.

12 MR. BAILEY: Yes, it is.

13 MEMBER SMILLIE: Okay.

14 CHAIR DELGADO: Jeff. Any other
15 questions? I lost track. Okay. Thank you
16 very much.

17 MR. BAILEY: Thank you.

18 CHAIR DELGADO: We move on to Kim
19 Deitz, and followed by Grace Gershuny.

20 MS. DEITZ: Start you day with me,
21 and end with it. How's that? If you could
22 put 10 minutes on, I'm going to real quickly

1 do a Marty and change hats in the middle of my
2 presentation.

3 CHAIR DELGADO: Kim, do you have
4 a -

5 MS. DEITZ: I'm up, and Grace is
6 right behind me, so we're going to actually -

7 CHAIR DELGADO: You're going to
8 team up?

9 MS. DEITZ: We're Co-Chairs for the
10 Multi Site, so I'm going to roll right into
11 that.

12 CHAIR DELGADO: Excellent. Okay.

13 MS. DEITZ: Okay. Ready?

14 SECRETARY HEINZE: I'll try to do
15 a better job than I did with Marty. Do you
16 want to know when you have one minute left out
17 of the ten?

18 MS. DEITZ: No. I'll just roll
19 right through.

20 SECRETARY HEINZE: Okay.

21 CHAIR DELGADO: Great.

22 MS. DEITZ: Okay. I always like to

1 give personal comment from Kim Deitz, not on
2 behalf of Smuckers, or OTA, or anybody else
3 towards the end of a meeting on what I see
4 from a historical perspective with regards to
5 materials, so I hope this helps you.

6 There was some discussion earlier
7 about deferred materials, withdrawn petitions,
8 petitions, in general, so a deferred material,
9 either the NOSB or petitioner can request the
10 material be deferred for gathering more
11 information. Once the information is brought
12 back to the Board, then you review the
13 material and vote on it.

14 A withdrawn petition is most likely
15 a petitioner requesting the withdrawal. For
16 example, when we had Harvey, we got inundated
17 with petitions in light of Harvey not going
18 the way that it did. Those petitions should
19 be archived so that if we ever need them
20 again, we should never shred any documents.
21 That came up, what do we do with withdrawn
22 petitions? Should we shred them? I think

1 those just need to be archived, because some
2 of them actually have TAP reports with them,
3 as well.

4 And then, as usual, I get up here
5 and I sit in the audience, and I get all
6 agitated about the petition process. And I
7 just want you to remember to follow the
8 process, and I say that every meeting. It's
9 in all of my Minute notes. Follow the
10 process, especially for removing a material
11 from the National List, or changing an
12 annotation. You have it written down.
13 There's Federal Register documents that tell
14 you what to do, and what you need, and what
15 the public needs, so please follow those
16 processes.

17 While I appreciate and support
18 organic alternatives out there, they need to
19 demonstrate that they are in the form,
20 quality, and quantity that the industry needs
21 before they're just taken off the list,
22 because it could be a business hardship.

1 606 materials, do you need a TAP
2 review? That should be a case-by-case basis,
3 and you are going to have to determine whether
4 nor not you have enough information for that,
5 whether you need it, or whether you don't.
6 That's just my personal opinion, and we can
7 talk later on that, if you want.

8 Tartaric Acid. Tartaric Acid,
9 folks, is a sunset material. If you really
10 don't have any way to change the annotation
11 right now, to change it from the National
12 List, to delete it from 605A or B, or
13 anything, so if somebody wanted to change the
14 Tartaric Acid right now, it would have to be
15 a petition to remove it, a petition to move
16 it, or petition to change the annotation.
17 You're reviewing it under sunset, so unless
18 you had somebody come forward and give you a
19 reason why Tartaric Acid should be taken off
20 the National List, you have to vote on what
21 you've got, and that's public comment. So,
22 again, there's specific reasons, and specific

1 things that are needed to remove a petition,
2 or to remove a material during sunset.

3 Methionine, I was on the Board when
4 we reviewed Methionine the first time. And I
5 encourage you, we, at that time, gave them
6 that window of opportunity to come forward as
7 a Task Force, and to bring us data. I think
8 they're doing a great job. I think they're
9 almost there, they're just not quite there.
10 So take that into consideration. If it's two
11 years, or three years, give them what they
12 need so that we finally have the answer to
13 that, and don't hurt the industry in the
14 meantime.

15 Okay. Other hat. Rolling into
16 Multi-site Certification or Group
17 Certification. Grace Gershuny and I Co-
18 Chaired that group, another wild group, 29
19 people on this Committee, and all very, very
20 opinionated and very strong voiced in their
21 ideals, so we're going to split up the thing.
22 Grace is going to go first and talk to you

1 about the OTA recommendation, and then I will
2 follow it up on the questions.

3 MS. GERSHUNY: Okay. We have a
4 summary overview. You should all have
5 received both the recommendations from the OTA
6 Group Certification Task Force, and much more
7 recently we submitted some responses to the
8 questions, the additional questions posed by
9 the CAC Committee. So I will just start out
10 by acknowledging the fact that Tracy was,
11 indeed, on just about all, if not all of the
12 calls that we had, and we had many. And that
13 the document that you folks have created does,
14 indeed, have a great deal of commonality with
15 our recommendations by some strange
16 coincidence. But there are a couple of things
17 that are different, and I just wanted to
18 mention the fact that our recommendations did
19 not call for a rule change, and did not call
20 for any distinction between initial and
21 subsequent inspections of multi-site
22 operations.

1 We did not in any case call for any
2 reduction of 100 percent annual inspections of
3 all production units. And we went to great
4 lengths to identify ways in which a production
5 unit made up of a whole bunch of sub-units
6 would be inspected by sampling of the sub-
7 units, so that not every sub-unit would be
8 inspected every year.

9 So first requirement for a group
10 would be that it's organized as a single legal
11 entity. The certification is for the group,
12 not for individual members. This is,
13 therefore, not anything like a pass for any of
14 those members who would otherwise become
15 independently certified. In most cases, they
16 would not be independently certified. They
17 would not be in the organic market at all.
18 The only way they're in the organic market is
19 as segments or portions of this group entity.

20 All sites facilities and production
21 units as called for in the current rule would
22 be inspected annually. All production units

1 operate under a single organic system plan,
2 not just all the sub-units in a given
3 production unit, but all production units in
4 the group operate under a single organic
5 system plan.

6 Criteria for production unit that
7 we identified so that how you would identify
8 how many -- whether a given set of sub-units
9 really can qualify as one production unit, is
10 that there would be a maximum number, we
11 suggest 200, but that could be adjusted
12 depending on the type of operations, similar
13 geography, and access by the certifying agent,
14 similar type of crop and harvest season,
15 common harvest collection point marketing,
16 common internal control staff and office
17 oversight. And the handling facility part is
18 very important.

19 Our recommendation says that any
20 site that includes a handling facility, and
21 particularly if that handling facility
22 processes product from more than one producer,

1 that handling facility must be inspected
2 annually, and must be considered a single
3 production unit. And this is really with
4 reference to things like the washing, packing,
5 drying, coffee, berry processing, and so
6 forth.

7 We did a great deal of work on
8 internal control system requirements. We
9 identified need for personnel training and
10 qualifications, items that minimize conflict
11 of interest. And I wanted to also mention
12 that the Committee's recommendation had some
13 good provisions for that, including protection
14 for whistle blowers to not be penalized.

15 Okay. The five minutes.

16 CHAIR DELGADO: You have one minute
17 left.

18 MS. GERSHUNY: Okay. We had some
19 other requirements, including what the annual
20 inspection should look like. And, in
21 particular, the two-step process for sampling
22 of sub-units based on risk analysis first, and

1 in higher risk units always inspected. And
2 then a random sample of the lower risk units.
3 And I'm going to let -- hopefully another
4 minute.

5 MS. DEITZ: Okay. In summary with
6 the questions, we did give you a paper on the
7 pending question issues. We really didn't
8 have a lot of time to go into that, but we did
9 our best based on the paper and the group. We
10 had one call. We tried to address some of
11 those, and I'll run through those real quick.

12 Our recommendations are based only
13 on producer groups, additional sectors should
14 be considered separately. And you can read
15 those, or ask me to read them, or ask me
16 anything else.

17 CHAIR DELGADO: Any questions from
18 the Board?

19 MEMBER SMILLIE: Can you please
20 just finish that.

21 MS. DEITZ: Okay.

22 MEMBER SMILLIE: I'm tired of

1 playing games. Just finish the -

2 MS. DEITZ: Okay. Additional
3 sectors should be considered separately,
4 including criteria for inclusion and
5 inspection protocols. So, in other words,
6 retailers and handlers. Any site that
7 includes a handling facility must be inspected
8 annually. Samples for external inspection
9 selection through two-step process of risk
10 analysis and combined with random sample of
11 low risk sub-units, as Grace just said.
12 Ability to detect non-compliances not
13 effected, assuming adequate oversight of
14 certifying agencies by NOP.

15 With the consumers, consumers will
16 accept group certification if integrity of the
17 process is assured. International issues
18 should be factored into the risk analysis, but
19 not be discriminatory toward domestic or
20 foreign operations. And internal control
21 system staff does not function as a proxy for
22 third-party inspectors provided in our

1 recommendation.

2 CHAIR DELGADO: Okay. Any other
3 questions from the Board? Dan, followed by
4 Katrina.

5 MEMBER GIACOMINI: On your
6 statements regarding Tartaric Acid, we realize
7 that it's sunset, and that it's dealing with
8 them as they are listed.

9 MS. DEITZ: Right.

10 MEMBER GIACOMINI: But in the
11 process of evaluating it, the Committee came
12 up, found that there was a difference in the
13 recommendation to the way it's listed. The
14 discussion that we're having on what that
15 annotation is, and the Program looking at that
16 to evaluate what the technical correction
17 would be is, in a way, what we're looking at
18 for the next five years, because that would be
19 done without an NOP review. Number one.

20 Number two is that it seems to me
21 a potentially valid consideration. I'm not
22 sure that I totally agree with it, but I can

1 see the point, is that if, as Brian stated,
2 that this was put on the list during a time
3 where the assumption was made of preference,
4 and preference no longer exists, that one of
5 the requirements that the substance were
6 necessary because of the unavailability of
7 wholly non-synthetic alternatives, has changed
8 slightly.

9 MS. DEITZ: Okay. We are during
10 sunset, though. And with regards to Tartaric
11 Acid, I wrote an original technical correction
12 to this when the proposed rule came out, so I
13 have it in my archives at my desk, so I will
14 definitely forward that to you. It got left
15 off the National List, and then I recommended
16 that it get put back on. And I'm not sure
17 whether it was on A or B, but I'll send that
18 to you, Dan. And I do have some other
19 information, so I'll dig that up for you. But
20 that's not going to happen at this meeting,
21 because I wasn't aware that you needed that.

22 Order of preference is nowhere in

1 the rule, and order of preference is for
2 everything, so Tartaric Acid shouldn't be
3 singled out just because it's an order of
4 preference in 1995. And we all, hopefully,
5 run our businesses in order of preference. I
6 know that we do, so that's my comment with
7 that. And I also know that there's different
8 functionalities for synthetic Tartaric Acid,
9 and non-synthetic forms in the processing
10 plants, in the formulation. So they are
11 needed from both, and as well with this -- I
12 guess there's a new petition out there for the
13 606.

14 CHAIR DELGADO: Okay. Katrina.
15 Sorry. Excuse me. Is that related to the
16 response? Okay. Bob, please.

17 MR. POOLER: This is Bob Pooler,
18 NOP. Tartaric Acid was added to the National
19 List along with Agar-agar and Carrageenan in
20 2003 as a technical correction, because it was
21 left off the list.

22 CHAIR DELGADO: Thank you.

1 Katrina.

2 SECRETARY HEINZE: Yes, that's
3 correct. And that's reflected in our current
4 recommendation, so you don't have to go find
5 your records.

6 MS. DEITZ: Okay.

7 SECRETARY HEINZE: Because you did
8 a great job, and I found them.

9 MS. DEITZ: Okay.

10 SECRETARY HEINZE: And they are in
11 the recommendation.

12 MS. DEITZ: All right. Okay.

13 SECRETARY HEINZE: The reason we've
14 asked for the technical correction is in the
15 1995 transcripts, when the original Board
16 voted on these items, they had the
17 annotations. But in the Federal Register
18 notices that went with the addition in 2003,
19 those annotations were not included.

20 MS. DEITZ: I guess I'm just
21 confused if we're adding annotations and
22 changing them during sunset, and that's

1 typically not what we've done.

2 SECRETARY HEINZE: Right.

3 MS. DEITZ: But now they're at the
4 petition process, so -

5 SECRETARY HEINZE: And so our
6 recommendation does not include them.

7 MS. DEITZ: Yes.

8 SECRETARY HEINZE: We're just
9 asking the Program to look at that, and go
10 through that history.

11 MS. DEITZ: Yes.

12 SECRETARY HEINZE: Yes. Our
13 recommendation is without them, because we
14 know we can't do that.

15 MS. DEITZ: Okay.

16 CHAIR DELGADO: Any other
17 questions? Well, thank you both, and
18 congratulations for being able to manage 29
19 members of your group. That is quite a
20 challenge.

21 MS. DEITZ: It's very interesting.
22 I thought the NOSB work was hard. Well,

1 believe me -- thanks.

2 CHAIR DELGADO: Up next is Nicole
3 Dehne from Vermont Organic.

4 MS. DEHNE: So hello, members of
5 the Board, and NOP staff. Thank you for the
6 opportunity to speak tonight. I know it's
7 kind of late, and I apologize if my stomach
8 growls into the mic, and I mean no threat by
9 that. My name is Nicole Dehne, and I
10 coordinate the certification program for
11 Vermont Organic Farmers, which is part of the
12 NOF of Vermont.

13 I'm speaking on behalf of over 500
14 certified producers, and there are several
15 points that I wanted to make this evening.
16 But first I wanted to start out by thanking
17 the Board for all the hard work in creating
18 all these recommendations and guidance
19 documents for this meeting, and to tell you
20 that it's much appreciated.

21 So I thought I would start with
22 adding new materials. In general, VOF agrees

1 with NOSB and the Materials Working Group,
2 which also deserves thanks for their hard
3 work, but there's definitely ambiguity in
4 regards to the finding ag, non-ag, synthetic,
5 and non-synthetic. And we appreciate that the
6 NOSB is working on providing clarity for these
7 issues, as it's clearly needed, as we saw in
8 the presentation today how convoluted they can
9 get. But it seems that everybody wants a
10 simple option, and since we're all saying what
11 our favorite options are, I believe that the
12 simplest option is Option E, which hasn't
13 really been discussed much, which is adding a
14 definition of agricultural system as a land-
15 based system that cultivates soil, producing
16 crops, livestock, or poultry.

17 So this option doesn't stretch the
18 meaning of agricultural, and I think it's what
19 consumers expect of an organic product. And
20 then yeast and other micro organisms can then
21 stay in 205.605, but can be added with an
22 annotation that requires the use of an organic

1 substrate, much like how yeast exists right
2 now in the National List with prohibition of
3 petrochemical substrate and the sulfite waste
4 liquor.

5 However, what's most essential,
6 especially with all of these ambiguities, is
7 to insure that all materials added to the
8 National List receive a TAP review, as is
9 required by OFPA. Just so you all know what
10 exactly you're dealing with. And no matter
11 what option is chosen, it seems to me that
12 items without standards or NOSB
13 recommendations on standards shouldn't be
14 considered organic, because there hasn't been
15 adequate discussion about what the details of
16 what goes into making them organic are.

17 I also wanted to touch on animal
18 welfare standards. With the public interest
19 in animal welfare and treatment, as this
20 continues to grow, and as new labels in this
21 area are being developed, I feel like it's
22 time for the organic industry to strengthen

1 our commitment to humane animal husbandry.
2 And the organic label should really represent
3 humane animal treatment for the consumer. And
4 it's VOF's belief that the organic standards
5 current address animal welfare issues, and
6 have laid the background for humane practices
7 in animal care. So it's our recommendation
8 that a task force be developed to create
9 additional guidances, for example, veterinary
10 procedures, production systems and facilities,
11 and wide range of other livestock-related
12 welfare concerns.

13 As far as multi-site operations,
14 despite the VOF not certifying multi-site
15 operations, that's my disclaimer, VOF feels
16 that there should be limitations on who is
17 eligible for multi-site status. So grower
18 group certification has been historically used
19 for farmers in developing countries who have
20 limited financial resources, and who are
21 working together as a cooperative or group.

22 As the CACC Board pointed out in

1 their guidance report, a limiting factor to
2 the growth of the organic industry is the
3 supply of raw materials, but not necessarily
4 the processing of those raw materials. Thus,
5 it was because of the limited resources and
6 needed raw materials that this exemption, of
7 sorts, was granted to grower groups. And, in
8 contrast, retailers are not required to be
9 certified under the rule. If a retailer
10 chooses to get certified, it's an entirely
11 voluntary practice. So our thought is why
12 grant retailers this exemption when it's not
13 coming from a place of need.

14 Retailers are choosing to get
15 certified to assure their consumers that they
16 have implemented best management practices, to
17 insure the organic integrity of the organic
18 products they carry. And if they want to
19 assure their customers of their practices, why
20 not adopt the higher standard of having each
21 individual store go through the certification
22 process? And if this process seems too

1 rigorous, then the retailer can always choose
2 not to get certified, as it's not required
3 under the rule.

4 So, for commercial availability, I
5 also wanted to comment on the NOSB's guidance
6 document on the commercial availability of
7 organic seed. And as we've talked about,
8 there's definitely a delicate balance between
9 supporting the organic seed industry, and
10 supporting growers, without over-burdening
11 them. And I know everyone is sensitive to
12 that. And our growers believe that the organic
13 seed industry is still in the growth and
14 development phase, and that the supply and
15 demand will push the organic seed companies to
16 develop seeds on their own.

17 While a national database of
18 organic seed could be useful for growers as an
19 educational resource, it's not necessarily
20 going to be useful for enforcement.

21 CHAIR DELGADO: All right.

22 Questions? Hugh.

1 DR. KARREMAN: Thank you, Nicole.
2 I'm glad you brought up the animal husbandry
3 issue. That is on our work plan, and I was
4 just wondering what you would think of - not
5 to get into real specifics, we can work on
6 that later - but veterinarians sometimes have
7 to dispense not fully approved by FDA type
8 medicines, in other words, alternative
9 medicines, and they need to have a valid
10 client/patient relationship to do that. And
11 I've been wondering, and I wonder what your
12 thought would be on this, about perhaps having
13 some kind of requirement in order to maintain
14 that valid client/patient relationship with
15 organic farmers to perhaps have the vet on the
16 farm at least twice a year, even if the farmer
17 doesn't need the vet for a sick cow, but to
18 make sure everything is going well for the
19 welfare of the animals, records check, all
20 that kind of stuff. Would that be within what
21 you're thinking?

22 MS. DEHNE: Yes. I do think that

1 that would give the consumers a certain -- it
2 would assure consumers that somebody is kind
3 of looking out as far as animal husbandry.
4 But we also have the inspection process that
5 happens on an annual basis. And our
6 inspectors are also looking for animal health,
7 and welfare issues, so I don't know if we
8 necessarily need that extra -- I feel like it
9 would sound like another type of inspection.
10 Or maybe a recommendation, instead of a
11 requirement.

12 DR. KARREMAN: Well, but truly to
13 maintain a legal relationship with that farm,
14 there has to be -- I mean, that's under FDA
15 Center for Veterinary Medicine rules and
16 everything. And I think that could use some
17 bolstering. I've got to admit, self-centered
18 veterinarian here, but this is across the U.S.
19 I mean, I know how to deal with organic
20 farmers, but a lot of the other vets don't,
21 and it would be good if they were staying in
22 contact with the farmers.

1 CHAIR DELGADO: Any other
2 questions? Okay. Thank you very much

3 MEMBER ENGELBERT: One quick
4 question.

5 CHAIR DELGADO: I'm sorry. Kevin.

6 MEMBER ENGELBERT: What's the
7 status in Vermont with your dairy farms, have
8 you seen a loss of farms, or farms going back
9 to conventional production because of this
10 pasture situation? Just where is Vermont at,
11 basically?

12 MS. DEHNE: We have a lot of
13 farmers who are seriously concerned about
14 their future because they don't know what is
15 going to happen with the pasture issue. As
16 far as -- we hadn't until this year had any
17 farms that had dropped out of the organic
18 program and gone back to conventional. And I
19 can't say that's necessarily all the pasture
20 issue, there's definitely some loss of hope in
21 the organic regs, I think is one level, but a
22 huge part of it is financial. So we've had a

1 few farms that have gone back to conventional,
2 and some that have just gone out of business.

3 CHAIR DELGADO: Question. Dan?

4 MEMBER GIACOMINI: I've got to
5 follow-up on that. Is that as much feed cost,
6 or is -

7 MS. DEHNE: Oh, yes.

8 MEMBER GIACOMINI: Okay. So it's
9 not just the pasture issue.

10 MS. DEHNE: No.

11 MEMBER GIACOMINI: Feed cost.

12 MS. DEHNE: And I hope I just said
13 that. Yes.

14 MEMBER GIACOMINI: Okay.

15 CHAIR DELGADO: Any other
16 questions. Okay. Thank you, Nicole.

17 MS. DEHNE: Sure.

18 CHAIR DELGADO: Coming up is Sam
19 Welsch, followed by Sue Baird. Sam is not
20 here? Let's move on then to Sue Baird, and
21 she will be followed by Miles Macavoy.

22 MS. BAIRD: Hi, I'm Sue Baird. I'm

1 with QAI, and I want to address several issues
2 today. But my first issue I wanted to
3 address, multi-site organic certification. We
4 served on the OTA Grower Group Task Force,
5 although I admit the last few times I've been
6 out and traveling, didn't do as well. But we
7 agree with the recommendation for implementing
8 the Grower Group certification. We strongly
9 agree that Group Certification should be made
10 available for small growers who otherwise may
11 not be able to afford organic certification on
12 the individual basis.

13 Additionally, U.S. desires their
14 products and many times we can't produce them
15 here within our borders, and they would not be
16 available for us to use without this method of
17 organic certification.

18 Try to address some of the
19 questions you asked, who are small farmers?
20 And that's a tough one, I've heard that
21 discussed back and forth both on the OTA and
22 on the ACA. USDA NOP defines small farmers,

1 or they did define small farmers in the NOP
2 preamble, and they said it was one with 25
3 acres and a gross income of \$30,000. Since
4 that's already been defined in the preamble,
5 perhaps that's one that we all could live
6 with.

7 I don't think it's practical to
8 limit a small farmer to one that has less than
9 \$5,000 gross income as some have suggested.
10 Those farmers are exempted from certification,
11 and our goal is not to exempt more, but to
12 bring a lot more farmers into organic
13 certification.

14 Does Grower Group internal control
15 systems improve organic oversight? Yes. Just
16 as HACCP improves food safety, so does having
17 persons that are familiar with local customs
18 and operations improve the organic
19 certification process. Someone who's familiar
20 with the operation, and with those customs
21 knows where to look for flaws and weaknesses.
22 Do those internal control officers replace

1 third-party certification agent inspectors?
2 No. No. Just as a QA Department does not
3 take the place of FSIS or FDA, but serves as
4 an extension to assist those government
5 auditors to enforce food safety audits, so
6 does an internal control system serve as an
7 extra set of eyes to protect organic
8 integrity.

9 Are some mistakes made with
10 internal control multi-site organic
11 operations? Yes. Just as there are mistakes
12 made on individual farms by individual
13 farmers, but we all strive, and they make
14 continuous improvements in their organic
15 system plans to become more effective, just as
16 I've seen many individual farmers make great
17 improvements over time in their own individual
18 inspections, and their own individual
19 operations.

20 Even though some mistakes have been
21 made, QAI urges NOP to not throw out the baby
22 with the basket. Marty stole my words, I

1 already had that down. That's here. Let's
2 just better develop stronger criteria for
3 certifying this important constituent of the
4 organic certification.

5 QAI acknowledges the reasoning of
6 the organic task force, when it stated, let's
7 just work on grower groups cooperatives for
8 the present. We will address the need for
9 further discussion of other multi-site groups
10 at a later date. We understand that logic.
11 We don't want to see and lose our small grower
12 group cooperatives that have been formed all
13 over the world. And NOP did threaten to
14 totally eliminate grower certification.
15 Everyone reacted with fear, but QAI urges NOSB
16 and NOP to not forget that many retail store
17 chains have been certified from the beginning,
18 the last five years, six years under this
19 system with accredited certifying agents.

20 These retail store corporations
21 have spent thousands of dollars to develop
22 comprehensive internal control systems under

1 which they implement their organic
2 certificates. They have spent years
3 developing their corporate images and their
4 reputations around being certified organic.
5 They are proud of their organic certification,
6 and they take it very seriously. Consumers
7 will be the losers if these retail stores
8 surrender their exhibited certificates.
9 Please continue to address multi-site
10 certification to allow these businesses to
11 operate as certified entities under their
12 organic system plans.

13 Commercial availability, we support
14 this recommendation, except please, please
15 think about 5B and D. We think that's too
16 labor-intensive for certifying agents and
17 producers. I think that you'll see -- I
18 started looking at that requirement. It may
19 be another full-time employee at my office.

20 DL-Methionine, we support you to
21 the Livestock Commission's second proposal to
22 extend the use of DL-Methionine until October

1 1, 2010, or maybe even better if that's what
2 you all think. Please allow us time. Okay.
3 Thank you.

4 CHAIR DELGADO: Questions from the
5 Board? Okay. Thank you very much.

6 MS. BAIRD: Thank you.

7 CHAIR DELGADO: Next up is Miles
8 Macavoy, followed by Katherine DiMatteo. I
9 think she already went. Do we have Miles? No
10 Miles. Alexis Bandenmeyer. I think we'll be
11 able to finish sooner than we thought, folks.

12 (Off the record comments.)

13 CHAIR DELGADO: Okay. So Sebastian
14 Belle. Sebastian has agreed to talk to the
15 Committee only.

16 SECRETARY HEINZE: Give us a sec.

17 CHAIR DELGADO: Yes.

18 (Off the record comments.)

19 CHAIR DELGADO: Okay. So let's
20 call Sebastian Belle, and that will be it for
21 today. So no pressure, Sebastian.

22 MR. BELLE: Thank you very much.

1 Batting clean-up, that seems to be my role in
2 life. My name is Sebastian Belle. I
3 represent the Maine Aquaculture Association.
4 We are the oldest state aquaculture
5 association in the country. We represent both
6 fin fish and shellfish growers, and yes, I
7 plead guilty. One of my members is a father
8 and two brothers who own a salmon farm, so I'm
9 the Evil Empire Incarnate here.

10 I've been in this business for
11 about 30 years, and I want to start by just
12 saying that I have a tremendous amount of
13 respect and thanks for the work that you folks
14 do, and also recognize the hard work that the
15 Livestock Committee under Dr. Karreman's
16 leadership is doing. I realize it's often
17 hard to wade through these issues, and
18 particularly for new issues that we bring to
19 the table, it's probably even more
20 complicated, and at times more controversial
21 than some of the other stuff.

22 I am a member of the Aquaculture

1 Working Group or Task Force under George
2 Lockwood's leadership, and I also want to
3 commend him for his leadership, and just
4 strongly support the comments that he made
5 earlier today, as well as the written comments
6 that were submitted. And just indicate that
7 we on the Working Group are really ready and
8 willing to help the Livestock Committee in any
9 way we can as you begin to go back and grapple
10 with a number of the issues that you clearly
11 have got to go back and rework on. And we're
12 willing to do that in a constructive and non-
13 invasive fashion, I think is the politically
14 appropriate way to put that.

15 I also want to thank the NOP
16 Program folks for their clarification earlier
17 today on the use of fish meal and fish oil
18 from wild sources. I think that was very
19 helpful, and really helps, I think, some of
20 the proposals that have been made by the
21 Working Group, perhaps see the light of day.
22 It's not, I think, a coincidence that the

1 minority report on the Livestock Committee was
2 written by a nutritionist, and the point I
3 want to leave you with today is that fish meal
4 and fish oil, and particularly fish oil, is
5 really problematic from a -- particularly a
6 marine fin fish point of view. Animals that
7 are being grown in marine environments.

8 The tilapia and catfish, which are
9 the species that will probably make it through
10 here under the current proposals, if you take
11 byproducts from those organic fish and use
12 them to generate fish meal or fish oil, they
13 are not going to satisfy some of the basic
14 amino acid profiles and lipid requirements for
15 marine fin fish, and that's the conundrum we
16 have. And, so, I respect that we're trying to
17 increase organic production, and use those as
18 feed ingredients, some of the byproducts from
19 those fish. I think that's a great idea. We
20 support that. But physiologically, we've got
21 a problem. You're talking about going from a
22 fresh water eco system and the species there

1 to a salt water eco system and species, and
2 there are some fundamental differences,
3 particularly during the start feeding phase
4 for marine fin fish.

5 And what that means is, when a
6 marine fin fish hatches from the egg, it has
7 some internal source of nutrition, and it
8 lives on that for some period of time. And
9 then it has to begin to feed on exogenous
10 sources of food. That is the highest
11 mortality phase in marine fin fish, and we are
12 very early on in the development of feeds for
13 marine fin fish, because we don't know a lot
14 of the nutritional requirements for those
15 species. And, so, fish meal and fish oil are
16 used in those species as kind of a safety
17 factor in the diets, so they're put in there
18 because that's what those animals begin to
19 feed on in the wild. And they kind of are a
20 fudge factor, if you will, and I use that with
21 some trepidation because I'm not a
22 nutritionist, but they're kind of a fudge

1 factor in the formulated feeds to insure that
2 you're not getting nutritional pathologies at
3 the very early start feeding phase of those
4 species.

5 I also want to make a point that
6 the allowing of private certified label
7 products and their use as ingredients in fish
8 feeds I think is very problematic. It sounds
9 like that may have been resolved, but the
10 point is, I have members that grow fish that
11 have never used antibiotics on their sites,
12 ever, in the entire history of that farm. And
13 they would be prohibited from reaching organic
14 certifications; and yet, people who were
15 feeding feeds with feed ingredients from
16 Europe in which they're allowed to use two,
17 and sometimes three times prior to harvest
18 antibiotics, those would be allowed, so that's
19 problematic, I think, from our point of view.
20 Thank you. Long day.

21 CHAIR DELGADO: Questions? Hugh,
22 followed by Dan.

1 DR. KARREMAN: Two questions, I
2 guess. What kind of fish are those folks
3 growing up in Maine that aren't using the
4 antibiotics?

5 MR. BELLE: Salmon.

6 DR. KARREMAN: Okay. And as far as
7 the fish oil being very, very important in the
8 early growth on the exogenous feeding, when
9 they just start out, we've heard that tilapia
10 and catfish and shrimp don't have quite the
11 right essential oil, or fish oils that are
12 needed. When the fish are becoming more
13 adult-like, would the tilapia-derived fish oil
14 be okay for them, versus let's say the little
15 guys that really need the strong stuff?

16 MR. BELLE: Honest answer, we don't
17 really know.

18 DR. KARREMAN: What's your best
19 educated guess?

20 MR. BELLE: I just -- I don't feel
21 like I'm in a position to really answer that,
22 Hugh. I think that -- we just don't know,

1 honestly.

2 DR. KARREMAN: Okay.

3 CHAIR DELGADO: Dan. And before we
4 do that, I just want to announce that we have
5 one more speaker after Sebastian, so please
6 continue. What is your question?

7 MEMBER GIACOMINI: To Hugh's point,
8 I believe the recommendation from the
9 Aquaculture Working Group is the 12 and 12 on
10 average over the production cycle, so that
11 would be compensated and adjusted through that
12 time frame.

13 One of the numbers that I'm having
14 a hard time getting a hold of, Sebastian, and
15 maybe you can help me, is - and partly, it's
16 because of the nature, or the difference in
17 the nature of our beast that we're familiar
18 with. There are certainly standards, typical
19 book values for fish meal, all that. But the
20 fish meal that you would be looking to be
21 utilizing, granted you can't feed salmon to
22 salmon, but the fish meal that you would be

1 looking to utilize in your salmon farms, the
2 number that I'm interested in finding out, and
3 I've asked a couple of people and they don't
4 know, or they're having too hard a time
5 finding it, what is the lipid level on that?
6 So not on book value fish meal, but on the
7 fish meal that you're going to be feeding,
8 what's the residual lipid level in that fish
9 meal? Because one of the reasons I'm asking
10 that is because we're starting to hear
11 comments, we had one of the commenters in our
12 packet address this total lipid content in the
13 diet. I'd like to have a little better idea
14 of where we stand on that when we are looking
15 to combine the two.

16 MR. BELLE: I don't know the answer
17 to that off the top of my head, but I'd be
18 glad to go back to some of our nutritionists
19 in the work group and get that number for you.
20 I think that's a very fair questions.

21 MEMBER GIACOMINI: Thank you.

22 MR. BELLE: Okay.

1 CHAIR DELGADO: Jennifer.

2 MEMBER HALL: Thank you, Sebastian,
3 for being here. Kind of given some of the new
4 information that we got earlier today, I have
5 a question for the Program. We've been
6 operating lately under a couple of
7 assumptions, one being that wild source for
8 meal and oil was not something that we could
9 consider. And, so, I've also, at least I
10 have, and we've discussed it in Committee,
11 that we've been operating under the assumption
12 that -- we have been told that all of the
13 aquaculture recommendation needs to be
14 submitted at once versus a piecemeal approach,
15 that a piecemeal approach is not something
16 that would be considered. And I guess I want
17 to verify that assumption, because I continue
18 to hear more and more that in the piscivorous
19 requirements, that the nutrition values are
20 not well known at this time. And, so, in the
21 interest of wanting to move some elements
22 forward where there is a greater knowledge and

1 security about what's happening there, could
2 the whole basket versus none be reconsidered?

3 CHAIR DELGADO: Can someone from
4 the Program comment on that?

5 MR. BRADLEY: Yes. Barbara will
6 have to comment on that from the Program
7 standpoint, because that would be a long-term
8 work plan management issue with the Board.

9 CHAIR DELGADO: Okay. We'll leave
10 that question open. Yes, you want to follow-
11 up?

12 MEMBER GIACOMINI: Just a little
13 clarifying, so we make sure that the answer
14 comes back to the right question. I believe
15 at the last meeting Barbara said that because
16 of fiscal issues, that the Program was
17 essentially sitting on the document that we
18 had already made a recommendation on, and
19 passed on to you, and was going to wait on
20 rule making until all of the aquaculture
21 issues had been passed to you. And so what
22 we're looking at now is whether, with the

1 additional funding, and the additional
2 manpower resources, will that move up in the
3 agenda, and could we possibly be seeing
4 aquaculture regulations for what we've already
5 passed without fish meal, fish oil, net pens,
6 by valves, and those things being fully
7 resolved?

8 MR. BRADLEY: As I recall, what
9 Barbara said was that there's a lot of
10 regulatory work ahead of aquaculture in the
11 mill right now, and that we would get to it as
12 soon as we can. If we can acquire additional
13 resources, that will certainly help, but it
14 wasn't a matter of we're going to wait on this
15 until you get the whole thing done. Continue
16 with your work, we'll continue with our's, and
17 we'll begin working on that as soon as we can.

18 CHAIR DELGADO: Okay. Any follow-
19 up questions? Hugh.

20 DR. KARREMAN: Well, I guess that
21 means that shrimp, and tilapia, and catfish
22 are in the mill. Yes, that's what we passed

1 last spring. Right. But you guys, we can
2 hope, are going to be working on that before
3 we might get the other parts in. That's what
4 you're saying right now.

5 MR. BRADLEY: What we're saying
6 right now is that we have pasture in front of
7 us, and we have origin of livestock, and I'm
8 sure aquaculture will be the next thing coming
9 in. We also have sunset items that have to be
10 done, so it's a workload thing, and we don't
11 have resources added to the staff yet that can
12 really take that burden off. We're not in a
13 position to say that yet. It takes a bit of
14 time to get people hired and then trained in
15 a reg writing mode.

16 CHAIR DELGADO: Just to follow-up,
17 as far as we're concerned, the Program has
18 received all the materials, recommendations
19 that have been approved. Correct? Related to
20 aquaculture. Is that correct?

21 MR. BRADLEY: Yes.

22 CHAIR DELGADO: Okay. Thank you.

1 Any other questions? Thank you very much.

2 Now at this time, our very last
3 speaker will be Dave Carter. And after that,
4 we'll be done.

5 MR. CARTER: All right. I'm Dave
6 Carter. It's late, you're tired, I'll be
7 quick. I was asked to come up and just give
8 a comment on the record. Grace Marroquin
9 wanted me to come up and just address one of
10 the issues that was identified by the
11 Materials Working Group, and that was if you
12 made the change on agricultural products and
13 had designation of organic yeast, what would
14 be the impact in some of the livestock feed,
15 issues with the yeast, and then other
16 microbial ingredients.

17 So in visiting with some of the
18 folks who use livestock feed regimens, yeast
19 is really what you would call an alternative
20 ingredient. It's not really a mandatory
21 ingredient. It's not like Methionine. Most of
22 the feeders and the folks that I talk with

1 don't even use yeast at this point, so it's an
2 alternative ingredient. If you were to have
3 it designated as organic and put it into feed
4 rations at the level that it's put in there,
5 it would be about 9 cents a day per animal on
6 beef, and so it just becomes a simple equation
7 of over a 90-day feeding period does the
8 animal put on X number of pounds to pay for
9 that ingredient?

10 So in terms of some of the other
11 microbial ingredients that are going in there
12 that would then come under this definition,
13 some of the things like the probiotics that
14 are not now currently considered organic.
15 They're not because they're growing them on
16 yeast substrate, and it's not organic, and so
17 I talked to probiotic producers, said yes, if
18 we got this done, we would definitely move
19 forward with that. So I just want to kind of
20 lay that out there in terms of that.

21 Now, while I'm here, there's two
22 other things, and I have to say number one is,

1 I've been working with folks on the
2 Fenbendazole petition. I appreciate the work
3 that was done on that, agree with what Rick
4 Matthews said, just remember I think as one
5 ingredient comes on there, I think it's time
6 to get the other one off of there. I think
7 that will be good.

8 And then, finally, the Pet Food
9 Task Force gave you a very, very good report
10 a while back, and before it gathers too much
11 dust, it would be very good to see that move
12 forward, because as I walked around Expo West,
13 there are more organic seals popping up on pet
14 food every single day, and it's really time to
15 get the fence around that, and get that under
16 control. So thank you.

17 CHAIR DELGADO: Okay. Thank you.
18 Questions? Dan.

19 MEMBER GIACOMINI: I completely
20 agree with you that the yeast issue is in very
21 small amounts, and it's not nutritional. That
22 is the very reason why it makes a difference

1 in livestock. It is in as a digestive aid,
2 not all yeast is yeast when it comes to the
3 value as a digestive aid. Regarding species
4 of acton in the ruminant regarding the
5 livability of getting it to the animal and
6 through the feed system. That is part of the
7 reason.

8 The second thing is, if your people
9 are paying 9 cents, they ought to look around.
10 The typical price on yeast is about 5-1/2 on
11 most Tim Graham products.

12 MR. CARTER: Yes. No, I'm thinking
13 organic. I'm going up the scale in terms of
14 that, so if they can save some money.
15 Actually, the best solution to everything is
16 buy some buffalo, put them out on grass and
17 forget about it.

18 CHAIR DELGADO: Okay. Katrina.

19 SECRETARY HEINZE: I just want your
20 affiliation for the notes.

21 MR. CARTER: What's that?

22 SECRETARY HEINZE: Your

1 affiliation.

2 MR. CARTER: Oh, my affiliation.
3 Actually, I'm representing myself. I'm with
4 the National Bison Association, Crystal
5 Springs Consulting, and Pet Promise.

6 CHAIR DELGADO: Okay. Any other
7 questions? Julie.

8 MEMBER WEISMAN: I just wanted to
9 address Dave on the issue of the pet food
10 recommendation, and make sure that it known
11 that we've already had two Handling Committee
12 calls since the publication deadline for this
13 meeting closed, including one that Emily Brown
14 Rosen and the Chair of the Task Force, Nancy
15 Cook, had been on. We have more in the
16 pipeline as soon as this meeting ends, so
17 that's -- it's definitely in gear now.

18 MR. CARTER: Thank you.

19 CHAIR DELGADO: Any other comments?
20 Questions? Julie, thank you very much. That
21 was very timely, and I'm really happy to hear
22 that you're working so well with that. This

1 concludes --

2 MEMBER: I was going to make a
3 motion for adjournment.

4 CHAIR DELGADO: No need for that.

5 MEMBER: Can't adjourn the whole
6 meeting.

7 CHAIR DELGADO: This concludes Day
8 Two of our meeting. Yes?

9 MEMBER: Just so not everyone
10 scatters, Livestock Committee does have to
11 have a meeting tonight. How about dinner in
12 the restaurant here, or later at 8:00. Let's
13 just talk afterwards.

14 CHAIR DELGADO: Okay. Yes, please.
15 We have--I think the crowds will also have
16 those-- so we are officially -- yes?

17 (Off mic comment.)

18 CHAIR DELGADO: No Handling
19 meeting. Okay. We're in recess until
20 tomorrow at 8:00.

21 (Whereupon, the proceedings went
22 off the record at 6:45 p.m.)

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