

U.S. DEPARTMENT OF AGRICULTURE
AGRICULTURAL MARKETING SERVICE
NATIONAL ORGANIC PROGRAM

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PUBLIC LISTENING SESSION:
USDA ACTIVITIES & PRIORITIES RELATED
TO ORGANIC AGRICULTURE & MARKETS

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TUESDAY
SEPTEMBER 20, 2011

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The session convened in the
Jefferson Auditorium at the USDA South
Building, 1400 Independence Avenue, SW,
Washington, DC, at 8:30 a.m., Mark Lipson,
Moderator, presiding.

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ATTENDEES:

GEORGE BASS, The Country Hen
LAURA BATCHA, Organic Trade Association
CARMELA BECK, Driscoll's
TONY BEDARD, Frontier Natural Products
Cooperative and OTA Board Member
SARAH BIRD, Annie's Inc. and OTA Board
Member
KARINE BOUIS-TOWE
MARK BUSCHING, Crowell & Moring, LLP
CHRISTINE BUSHWAY, Organic Trade
Association
STEVE ETKA, National Organic Coalition
LESLIE GOLDMAN, Beet Keepers, Return!
KATY GREEN, Maine Organic Farmers and
Gardeners Association
JAYDEE HANSON, Center for Food Safety
KRISTINA HUBBARD, Organic Seed Alliance
MARK KASTEL, The Cornucopia Institute
BETH LARABEE, Iowa Organic Association
ARIANE LOTTI, Organic Farming Research
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SUSAN PAVLIN, Slow Food Atlanta/GA Organics
JIM PIERCE, Oregon Tilth
JULIA SABIN, Smucker Natural Foods, Inc.
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LINDSEY LUSHER SHUTE, National Young
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RICHARD SIEGEL, Richard D. Siegel Law

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MICHAEL SLIGH, RAFI-USA

ATTENDEES(Cont'd):

KARRI STROH, Northern Plains Sustainable
Agriculture Society

CHARLOTTE VALLAEYS, The Cornucopia
Institute

CRAIG WEAKLEY, Craig Weakley Consulting and
OTA Board Member

KAREN WYNNE, Alabama Sustainable
Agriculture Network

LESLIE ZUCK, Pennsylvania Certified Organic
and OTA Board Member

C-O-N-T-E-N-T-S

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ERRATA

For transcript of oral comments,

"Public Listening Session: USDA Activities and Priorities
Related to Organic Agriculture and Markets; September 20, 2011;
Washington, D.C."

Page 25, line 19, "equivalents" should read, "equivalency";

Page 35, line 21, "Velteis" should read, "Velthuis";

Page 35, line 22, "Stacy" should read, "Stacey";

Page 58, line 7, "Velteis" should read, "Velthuis";

Page 64, line 20, "Got" should read, "You've got";

Page 178, line 5, "processes" should read, "processors";

Page 223, line 14, "Doug" should read, "Deputy Undersecretary
for Rural Development, Doug O'Brien";

Page 250, line 13, "depending" should read, "pending".

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

8:57 a.m.

1
2
3 MR. LIPSON: Good morning, my name
4 is Mark Lipson. I'm the Organic and
5 Sustainable Agriculture Policy Advisor here at
6 USDA, and I'm very, very happy to be opening
7 this listening session for the public to
8 present comments to USDA on the Department's
9 priorities and activities related to organic
10 production and marketing.

11 Today's is basically a day for
12 USDA to listen. We're going to be saying very
13 little compared to how these events have gone
14 in the past.

15 We're really very anxious to hear
16 about the perspectives that the members of the
17 public will bring. We're holding this session
18 now for two basic reasons, and these are the
19 two areas where we have asked the public to
20 direct their comments.

21 First is relative to the National
22 Organic Program, which manages the national

1 standards and certification and the USDA
2 Organic Seal.

3 For many years now, the National
4 Organic Standards Board, which is the public
5 advisory board charged with certain
6 authorities relative to the National Organic
7 Program has been the main venue for public
8 comment to the program.

9 But because the Board's authority
10 is only limited to certain specific areas, it
11 has received a great deal of comment and spent
12 a great deal of time receiving comments
13 relating to things that are outside of its
14 authorities and boundaries.

15 So one part of this session will
16 be asking for comments on other aspects of the
17 National Organic Program beyond the
18 responsibilities of the National Organic
19 Standards Board.

20 The other aspect of what we're
21 asking the public to comment on today is
22 USDA's priorities and activities for organic

1 throughout the rest of the Department, beyond
2 the National Organic Program.

3 The regulatory responsibilities of
4 the NOP are just one facet of the Department's
5 focus on organic.

6 My responsibilities as the Policy
7 Advisor include chairing the Organic Working
8 Group, which is the Department-wide
9 information network that cultivates
10 communication and cross-agency coordination
11 within the Department.

12 So the Organic Working Group is
13 hosting this session today in part to receive
14 comments on priorities for all the rest of the
15 Department. What are the most important
16 things that we need to be working on?

17 And we did have the Deputy
18 Secretary, Kathleen Merrigan, scheduled to be
19 here. She's been delayed a little bit. She's
20 got an emergency meeting with the Secretary,
21 so she will be here and we'll get her comments
22 in when she arrives.

1 In the meantime, I'm going to go
2 ahead and ask the rest of our listening panel
3 to introduce themselves.

4 Throughout the day we will have
5 senior officials and program staff of the
6 Department here to receive the comments that
7 the public will be offering. They'll be able
8 to just ask short, clarifying questions of the
9 presenters.

10 But we do have a very full
11 schedule for the day of public comments, so in
12 order to get everybody in before we need to
13 adjourn at the end of the day we won't have a
14 lot of time for back and forth.

15 Finally, I'll just mention that
16 the other driver for our request for public
17 comments at this time is the inclusion in the
18 USDA's strategic plan of a performance
19 objective, looking for an increase in the
20 number of certified U.S. organic businesses of
21 25 percent from 2009 to 2015.

22 That is in writing since last

1 summer as a very specific goal of the United
2 States Department of Agriculture, and so
3 therefore we're asking for the public to
4 express their priorities to help us get to
5 that goal.

6 What are the most important things
7 that we can be doing to achieve that goal?
8 What are the most important limiting factors
9 in the environment for organic agriculture?
10 You know, are they production or marketing?
11 What are the most important limiting factors
12 that we at USDA can try and address in order
13 to meet that goal?

14 The Deputy Secretary, I think,
15 will talk a little bit more about that goal
16 when she gets here, but that's a little bit
17 indefinite, unfortunately. But that's just
18 everyday business around here, I'm afraid.

19 So, I'll ask the listening panel
20 that we have to start the session to introduce
21 themselves, make any very brief introductory
22 comments that they also have, and then we'll

1 get started with the public comments.

2 So Dave, why don't you begin?

3 MR. SHIPMAN: I'm Dave Shipman.

4 I'm the Acting Administrator of the
5 Agricultural Marketing Service. Can you in
6 the back hear me? Okay, thanks.

7 First of all, it's great to have
8 you here and I really appreciate you taking
9 the time to share some of your concerns,
10 interests, what direction we should be headed.

11 But I thought I'd take the
12 opportunity, just take two or three minutes to
13 tell you a little bit about Agricultural
14 Marketing Service.

15 Our mission is to facilitate the
16 marketing of agricultural products. That
17 means whether it's organic or conventional,
18 our mission is to help producers and handlers
19 and the participants in the market, market
20 their products.

21 We've been doing this for close to
22 a hundred years now. We started over 90 years

1 ago to market news, providing producers in the
2 marketplace the information as to what's the
3 value of their product in the marketplace,
4 what's it selling for?

5 And as the organic market has
6 grown, we've taken on providing more
7 information about organic prices. The Farm
8 Bill allocates an extra \$3.5 million to expand
9 market news for organic.

10 We now have over 246 different
11 products that we report in our marketing news
12 arena, so that the organic program again can
13 assess the value of their products in the
14 marketplace, and we're continuing to do that.

15 At the AMS we do house the
16 National Organic Program, which is under the
17 excellent leadership of Miles McEvoy, at the
18 end table, and he'll introduce himself in a
19 minute.

20 But we also have a number of other
21 programs that may impact or benefit the
22 organic program, and I thought I'd just

1 mention a few of them.

2 We are primarily a user fee
3 organization. That's a little different than
4 what you typically see in government.

5 Only about three and a half
6 percent of our budget as an agency is
7 discretionary or appropriated money. The rest
8 of it is provided through fees that we charge
9 for the services that we render.

10 Because we are a user fee program,
11 understanding the customers' needs,
12 understanding the stakeholders' needs has been
13 at the heart of our agency since its
14 beginning.

15 We really sit down and really need
16 to understand, what do you need as an industry
17 to market your product? What can we help you
18 and assist you in doing?

19 So that is moving in our program.
20 We also have, most of our programs reach out.
21 We have agreements with all 50 states,
22 actually multiple agreements with some of them

1 to provide those services.

2 Some programs you may be
3 interested in, we do monitoring and
4 enforcement of the Seed Act. And what that
5 means is that seeds sold to farmers in the act
6 of purity, the identity of that is accurate,
7 it's like a truth in labeling.

8 And we monitor that with as close
9 as which it takes to provide that service.
10 And if the seed is being sold and is not
11 labeled properly, violations will have to be
12 assessed.

13 We have a number of grant programs
14 that, and our portfolio of grants has
15 increased over the recent years with the
16 recent Farm Bill of 2008, the Farm Bill.

17 But we do have \$10 million in
18 farmers' market promotion programs. This is
19 helping direct marketing from producers to the
20 public and about \$10 million worth of grants
21 in that arena.

22 We have what we call Federal State

1 Marketing Improvements or FSMIP grants that
2 runs around \$1.3 million. Excuse me, I came
3 down with a cold over the weekend.

4 We have cost share, which some
5 producers in the organic arena use. Certainly
6 that was \$22 million that the Farm Bill
7 provided.

8 And then we have \$55 million this
9 year providing specialty crop block grants to
10 states to the specialty crop industry and
11 producers to facilitate the marketing of that
12 product.

13 We have a bunch of other programs.
14 I encourage you to go to the website to gain
15 a better understanding of what our agency
16 does.

17 But again I really want to thank
18 you for coming here today. I'm anxious to
19 listen to where we should be moving our
20 organic program, and your input is vitally
21 important as we go through that. Thank you.

22 MS. STRZELECKI: Good morning,

1 everyone. I'm Kelly Strzelecki with the
2 Foreign Agricultural Service. And the Foreign
3 Agricultural Service, our mission is really to
4 grow and maintain foreign markets around the
5 world for all agricultural products including
6 organic products.

7 And we'll have someone today
8 listening all day, rotating. It won't be me
9 always, but someone will be here from FAS all
10 day.

11 So if you have any questions about
12 what we do or specific comments about trade,
13 we'd love to hear them. Thank you.

14 MS. MILLS: Good morning. My name
15 is Ann Mills, and I'm here just in time. It's
16 great to be here, I apologize for being late.

17 I am the Deputy Under Secretary
18 for Natural Resources and Environment, and as
19 you all know NRCS is a special organics
20 program. We've invested more than \$20 million
21 over each year for the last two years, and we
22 are thrilled to be part of helping the

1 organics industry and helping farmers
2 transition to organics, and look forward to
3 listening today. I also will be unable to be
4 here all morning, but we do have somebody from
5 NRCS who will be listening and can take my
6 spot. And so we want to listen, we want to
7 hear how we can improve our services and
8 improve our programs. Thank you very much.

9 MS. WOTEKI: Good morning,
10 everyone. I'm Cathy Woteki. I'm the Chief
11 Scientist for the Department and also the
12 Under Secretary for Research, Education and
13 Economics.

14 And like my colleagues I want to
15 welcome you all here today, and also to thank
16 you for your willingness to come and talk to
17 us about what you see as being the problems
18 that you're facing.

19 And as Mark Lipson said in his
20 introductory comments, also helping to
21 identify what the priorities are that we
22 should be addressing.

1 In my role as Undersecretary, I
2 have responsibility for oversight for four of
3 the science agencies within the Department.
4 And those are the Agricultural Research
5 Service, the National Institute of Food and
6 Agriculture, the Economics Research Service
7 and the National Agricultural Statistic
8 Service.

9 And all four of those agencies
10 have programs for organic agriculture. The
11 research agencies, intramural ARS and
12 extramural NIFA, have ongoing research
13 programs to address problems of organic
14 farmers and to find solutions.

15 And NAS, through its census of
16 agriculture and survey activities provides
17 data to inform program and policy decisions of
18 the Department, and those data come from
19 organic farmers who respond to the surveys and
20 the census.

21 And the Economics Research Service
22 has played an invaluable role over the last

1 several years in bringing to light their
2 economic analyses of this very important and
3 growing part of our economy.

4 Earlier this spring we sponsored a
5 three-day long workshop focusing on organic
6 research and the questions coming from the
7 community.

8 We reflected on what the research
9 programs have provided us so far, and we'll be
10 providing the proceedings from the workshop
11 later on.

12 All four of the agencies are
13 active participants in the Organic Working
14 Group. And one of the new areas that we're
15 working on, and this relates to the education
16 that's in the title of this mission area, is
17 developing an educational unit for our field
18 personnel to update them on their organic
19 farming literacy.

20 So that is a project that's in
21 progress right now. At today's listening
22 session we're very much here to listen and to

1 learn from you, and we'll be well represented.

2 I can see looking in the audience
3 there's several members of the mission area
4 already present in the audience, and we're
5 looking to hear what your issues are and
6 specifically what the priorities are that you
7 think we should be addressing.

8 So thank you all for being here.

9 MR. MCEVOY: Good morning, Miles
10 McEvoy, Deputy Administrator with the National
11 Organic Program. Thanks for coming today.
12 We're really looking forward to your input.

13 We're here to listen to what the
14 priorities are from the organic trade in the
15 organic community about organic agriculture in
16 general at USDA and specifically in my role
17 with the National Organic Program.

18 The National Organic Program, our
19 vision is organic integrity from farm to
20 table, consumers' trust of the organic label.
21 We have three major areas of focus in the
22 program.

1 That's standards development that
2 we work very closely with the National Organic
3 Standards Board. The National Organic
4 Standards Board has two public meetings a
5 year.

6 They get lots of public comment on
7 their proposals that they're working through
8 that process. There has been folks that come
9 to the NOSB meeting to really give comment to
10 the National Organic Program.

11 So this is one of the initiatives
12 to have this listening session, is to give
13 folks an opportunity to give public comment to
14 the National Organic Program directly rather
15 than through the National Organic Standards
16 Board.

17 So a lot of what we're doing, one
18 of the primary focus areas is that standards
19 development work.

20 The other areas are accreditation
21 and oversight of the certifying agents that
22 are operating all around the world to inspect

1 and verify that the organic producers and
2 handlers are meeting the organic standards.
3 So that's a very important part of our work.
4 We're certainly interested in your comments
5 about how we can strengthen our efforts in
6 that area.

7 And finally, the other major focus
8 area is enforcement, making sure that all
9 organic claims of products sold in the U.S.
10 under the USDA organic label are truthful
11 claims, and investigating and enforcing and
12 ensuring the integrity of all those products.
13 We also handle, manage the organic
14 certification cost share program, which is a
15 very important way of supporting organic
16 producers and handlers. Makes a difference to
17 especially the smaller producers and smaller
18 handlers that are so integral in the whole
19 trade.

20 We have a very modest program.
21 It's a \$6.9 million budget currently to
22 support a \$29 billion industry. We work hard

1 for protecting organic integrity and still
2 have a lot of work to do, so we appreciate
3 your comments and really look forward to your
4 comments and listening to your suggestions of
5 how we can make further improvements to the
6 program. So thank you.

7 MR. LIPSON: All right. Thank
8 you, Miles, and everyone. Again I'll just
9 remind everybody that the panelists will be
10 coming and going today, so please don't feel
11 that it's rude on their part.

12 You know, it's the end of the
13 fiscal year. Everybody's really got a lot of
14 meetings and commitments. But we will have
15 representatives from throughout the Department
16 here all day listening.

17 And there will be a transcript
18 made of all the comments both oral and the
19 written comments that we're receiving over
20 email.

21 Those will be accepted until
22 October 1st, at the email

1 2011organiclistening@ams.usda.gov.

2 So we're going to move the
3 schedule up a little bit until the Deputy
4 Secretary gets here, so we'll ask folks to
5 please be ready to just come in, succeed each
6 other in making comments.

7 Our first set of comments are Tony
8 Bedard, Sarah Bird, Christine Bushway, Chuck
9 Marcy, so that'll be the first group. Please
10 pay attention to the timer in front of you.
11 It'll be a five-minute limit, and thanks very
12 much for being here.

13 Tony?

14 MR. BEDARD: Hello, my name is
15 Tony Bedard, CEO of Frontier Natural Products
16 Co-op, located in Norway, Iowa. I'm also an
17 Organic Trade Association board member and I'd
18 like to thank the USDA for setting up the time
19 to hear from its stakeholders.

20 Frontier Natural Products Co-op
21 specializes in organic products and has been
22 doing so for more than 35 years.

1 Our products are found in natural
2 products stores, grocery stores, and specialty
3 shops throughout the United States, Canada and
4 other countries in the world.

5 As a leading supplier of organic
6 spices and herbs, some of their Frontier
7 natural organic brands we hold the leadership
8 position in the marketplace, but also in the
9 effort to convert food produced in sustainable
10 farming practices through our Well Earth
11 sustainable sourcing program.

12 Along with organic herbs and
13 spices, we're also the lead marketer of
14 personal care products. We have certified our
15 organic line under the National Organic
16 Program, and our organic products proudly
17 carry the USDA seal.

18 On behalf of the Organic Trade
19 Association's board of directors I'd like to
20 thank USDA's Foreign Agricultural Services for
21 their ongoing support of the industry.

22 The expert promotion activities

1 funded through the market access program are
2 offering a great value to the sector and
3 enabling us to bring more U.S. organic
4 products to the world market.

5 We also want to thank the Foreign
6 Agricultural Service for their tireless work
7 to reduce trade barriers for organic products.
8 The team at FAS has worked closely with the
9 OTA staff and members on the trade issues in
10 Mexico, the EU, China, Japan, and Korea in the
11 last year, and we can't thank you enough for
12 all that support.

13 The organic sector is truly a
14 worldwide marketplace. Frontier Co-op sources
15 ingredients from 49 countries and exports its
16 products to dozens of countries around the
17 world.

18 I want to emphasize the value of
19 organic equivalents trade agreements to the
20 U.S. sector. Simplifying and keeping down the
21 cost to export is a great benefit to U.S.
22 organic companies that are becoming more and

1 more interested and involved in exporting.

2 We hope these agreements can be
3 structured in a way that ensures the integrity
4 of organic products and ingredients coming
5 into the United States.

6 And lastly, we acknowledge and
7 appreciate NOP's stepped up efforts in
8 oversight of a global program including NOP's
9 recent visit to China and report issued on the
10 trip as well as the notification to the trade
11 of fraudulent certificates.

12 We need you to keep up these
13 important overseas enforcement efforts. Thank
14 you.

15 MS. BIRD: Good morning. My name
16 is Sarah Bird and I'm the Senior Vice
17 President of Marketing for Annie's Inc., a
18 Berkeley, California, based company, and I'm
19 also Vice-Chair of the Organic Trade
20 Association.

21 It's an honor to have this
22 opportunity to speak with you this morning,

1 and I want to thank the USDA for setting up
2 time to hear from stakeholders.

3 First and quick background on
4 Annie's. Annie's is a manufacturer of natural
5 and organic pasta meals, snacks, cereals, and
6 condiments.

7 Our products are distributed
8 nationally in all major retailers from Whole
9 Foods to Kroger's, Safeway, Target, Walmart
10 and Costco.

11 In this time of economic
12 uncertainty our sales continue to be very
13 healthy. We're growing at over 20 percent a
14 year and have been growing at that pace for
15 the last several years.

16 Strong Annie's sales drive healthy
17 organic farms. Annie's is the largest U.S.
18 buyer of organic durum wheat. Over the past
19 five years, Annie's has purchased more than
20 40,000 tons of domestic organic wheat from
21 Montana and North Dakota primarily.

22 In 1997, the year organic acreage

1 data was first published, there were 125,000
2 acres of organic wheat in cultivation. Now,
3 according to the 2008 Economic Research
4 Service survey, this number has more than
5 tripled.

6 There are over 415,000 acres of
7 organic wheat cultivated each year. This is
8 across 25 states and the yield is over eight
9 and a half million tons of organic wheat per
10 year.

11 In addition to buying a lot of
12 organic wheat, Annie's is a major buyer of
13 organic milk and cheese solids. According to
14 our suppliers, markets for organic milk and
15 cheese solids are a critical component of the
16 overall profitability of organic dairy.

17 In fact, every time we sell a box
18 of Annie's organic mac and cheese it supports
19 family farms. Our organic cheese comes from
20 Organic Valley's crop cooperative and their
21 1,643 farm members.

22 Annie's is deeply concerned about

1 genetically engineered crops. We anticipate
2 a petition to deregulate GE wheat in the not-
3 so-distant future.

4 We view GE crops as a significant
5 threat to organic agriculture due to organic
6 crop contamination by genetically engineered
7 crops. This will damage both the domestic and
8 global organic markets.

9 Regardless of the organic
10 regulations' tolerance for non-intentional
11 contamination, organic consumers will not
12 accept contamination.

13 Consumer confidence and the
14 economic viability of organic agriculture
15 rests on keeping organic crops and products
16 free of GE contamination.

17 Today's consumer is knowledgeable
18 and informed. We must deliver what the
19 consumer demands.

20 For the wheat growers that supply
21 Annie's, inadvertent contamination will have
22 real economic consequence. Annie's will not

1 buy GE contaminated wheat because we know our
2 consumers simply would not accept it.

3 Such contamination forces a
4 manufacturer like Annie's to look overseas to
5 continue, to countries that either have not
6 deregulated the GE crops or have maintained
7 necessary safeguards to prevent contamination.

8 The best picture for a vibrant
9 organic economy is a vibrant U.S. production
10 base. Annie's does not want to be forced to
11 source our business offshore.

12 For U.S. organic wheat producers,
13 exports also play a key role in the overall
14 profitability of farms. GE contamination of
15 domestic organic crops all but puts a halt to
16 export opportunities.

17 The damage currently being done to
18 the organic brand and the organic marketplace
19 from GE contamination, as well as the real
20 possibility for future expansion of this
21 contamination, needs to be addressed in order
22 for the U.S. organic agriculture to thrive.

1 We ask you to implement your
2 authority under the Plant Protection Act of
3 2000, to fully protect public health, the
4 environment and the economic interest of the
5 United States.

6 This authority should be
7 implemented through comprehensive regulations
8 to prevent further damage to lucrative and
9 important U.S. and international markets, to
10 ensure farmer profitability and rural economic
11 development and to support environmental
12 protection and consumer choice. Thank you.

13 MS. BUSHWAY: Good morning. I'm
14 Christine Bushway, the CEO of the Organic
15 Trade Association.

16 I'd like to thank USDA and the
17 Organic Working Group for scheduling a
18 stakeholder listening session today, when so
19 many members of the organic food and farming
20 industry are in the Washington, D.C. area.

21 OTA's board of directors meets
22 later today here in Washington, and we're

1 pleased that the democratically elected
2 industry leaders have an opportunity to
3 participate here with you this morning.

4 These individuals represent a \$29
5 billion a year industry growing at double
6 digits, one that is creating jobs at four
7 times the national average.

8 They are in a sense the modern-day
9 rock stars of our time during this really
10 abysmal economic period that is worldwide.

11 I'd like to make a special
12 acknowledgment of the outstanding organic
13 research conference that Dr. Woteki referred
14 to that was held here and organized by ERS
15 last spring.

16 OTA had the opportunity to be a
17 supporting organization of the event, and the
18 conference demonstrated the quality of
19 research being conducted on organic
20 agriculture.

21 It's impressive and the direct
22 result of a focused emphasis on the part of

1 USDA. We were inspired by this conference to
2 bridge the gap between academic research and
3 the private sector.

4 As a result, this week at All
5 Things Organic Natural Products Expo East in
6 Baltimore, OTA has produced a mini-conference
7 track to highlight for the industry this
8 promising research and its relevance to the
9 organic agriculture, food, fiber and personal
10 care sector.

11 The conference track features the
12 latest in organic research beginning with
13 classical plant breeding and including
14 everything from organic crop yields, organic
15 commodity price discovery and demand forecast,
16 environmental benefits and water quality use,
17 to the latest in health benefits.

18 I would especially like to thank
19 the USDA scientists that will take time this
20 week to present their work directly to the
21 trade including Michel Cavigelli from ARS,
22 Cathy Greene from ERS, James Bernau from AMS,

1 and Jill Auburn from the Secretary's office.

2 While it is gratifying to showcase
3 the research being done on organic agriculture
4 there are research needs. Many practical in
5 nature, but need attention.

6 For example, OTA's egg-producing
7 members have a phenomenal track record in
8 terms of food safety and SE prevention.

9 Yet the Food and Drug
10 Administration is expressing serious concern
11 about the National Organic Program requirement
12 for outdoor access, and their belief this
13 practice may not be compatible with good
14 practices for SE prevention.

15 OTA completed a literature review
16 on the subject, and there is very little
17 research conducted on certified organic farms
18 on this subject.

19 We are confident that this
20 research would demonstrate that organic
21 poultry production practices are not riskier
22 in terms of Salmonella prevention than their

1 non-organic counterparts.

2 This is just one example of the
3 practical research needs of this growing
4 sector.

5 I would like to thank the
6 Secretary's office for reconstituting the AC21
7 committee. As you know there is grave concern
8 that the status quo in terms of coexistence
9 will have a detrimental effect on the long-
10 term health of the organic and other identity
11 preserved segments of agriculture.

12 OTA applauds Secretary Vilsack's
13 balanced appointments to the committee, and
14 appreciates the very specific charge the
15 Secretary laid out to address the issue of
16 compensation for market loss due to
17 contamination.

18 Lastly, I would especially like to
19 thank the team at FAS for their tireless work
20 on behalf of the organic sector, Kevin Saygel,
21 Heather Velteis, OTA's marketing specialists
22 for their work on MAP programs, Stacy Peckins,

1 Katherine Bedard, Kelly Strzelecki, Marianne
2 McElroy and their support of the industry
3 through the TASC program, Shari Kosco and Tim
4 Rocke, and their work to get HS codes
5 established for organic products this year,
6 and of course Darci Vetter, the Deputy
7 Undersecretary, for working directly with
8 OTA's sugar task force to resolve the serious
9 sugar shortage that took place this summer.

10 We can't thank you enough for your
11 efforts. Enjoy the day, and I hope to see
12 many of you in Baltimore. Thank you.

13 MR. MARCY: Good morning. My name
14 is Chuck Marcy. I've been affiliated with the
15 organic industry since the late 1990's when I
16 joined Horizon Organic as President and Chief
17 Executive Officer.

18 Horizon Organic was the largest
19 organic dairy brand and continues to be so
20 today. I ran that company until late 2004,
21 when it was last an independent operation.

22 I later ran the Van's Frozen

1 Waffles business as President and CEO. Van's
2 is the leading brand of organic frozen waffles
3 in the country.

4 And I currently serve as a
5 business strategy and marketing consultant to
6 companies in the organic industry. I live in
7 Boulder, Colorado.

8 Finally, I've been a member of the
9 Organic Trade Association's board of directors
10 for the past nine years and served as its
11 Treasurer for the past seven.

12 My perspective that I will share
13 with you today is clearly a business focus
14 perspective. I'd like to thank the USDA for
15 setting up the time to listen to its
16 stakeholders. This is a very important
17 opportunity for us.

18 As Christine indicated, organic
19 products were a \$29 billion industry in 2010.
20 The latest data from the Trade Association
21 indicates that 96 percent of organic
22 operations nationwide are planning to maintain

1 or increase employment through 2011.

2 In fact, the organic sector is
3 creating jobs at four times the rate of the
4 economy as a whole, which is amazing given the
5 current economic climate.

6 This is all very good news.

7 However, the long-term health of the organic
8 agricultural sector will require a marketplace
9 and regulatory stability in order to attract
10 capital investment, start up enterprises and
11 new farmer/producers.

12 When regulations do change it's
13 critical that adequate transition times be
14 allowed to minimize business disruption. The
15 organic sector has been requesting guidance on
16 many issues since the implementation of the
17 regulation.

18 We're pleased to see the excellent
19 productivity of the National Organic Program,
20 and the number of proposed rules and guidance
21 documents that have been released over the
22 past year.

1 While increased communication and
2 guidance from the NOP is welcomed, we
3 recognize that in many cases previous
4 clarifications, interpretations and practices
5 are not consistent with the formal guidance
6 now being issued or regulatory changes being
7 proposed.

8 The change in policy or regulation
9 will require our members to change practices
10 and/or products that they have used to build
11 their business around for a significant number
12 of years.

13 We recognize that as a young
14 industry we are facing the challenges of
15 growth which are great challenges, and that
16 regulatory clarification through NOP guidance
17 plays a critical role in protecting the
18 organic integrity which we all care about.

19 However, it's extremely important
20 to the continued success of the organic
21 industry that undue burden is not placed on
22 companies when regulatory clarification

1 introduces new policy.

2 Certified operators should not be
3 subjected to financial hardship due to these
4 policy clarifications, nor should it result in
5 unnecessary environmental waste in terms of
6 destroyed packaging and labeling.

7 It is really important to remember
8 that these burdens hit the small and medium
9 sized businesses the hardest. They are most
10 likely to have long inventories on labels and
11 packaging, and will be least likely to have
12 the cash reserves necessary to make changes
13 quickly.

14 We respectfully request that the
15 NOP carefully consider any information
16 received about the impact regulatory changes
17 will have on certified operations, and the
18 amount of time that is needed to bring
19 operations into compliance without imposing
20 undue burden or hardship.

21 Transition and implementation
22 should be decided according to comments and

1 documented data on each specific incident
2 rather than relying on a set and possibly
3 arduous number, for example, two years.

4 Adequate transition and
5 implementation time is critical to market
6 stability and the overall confidence and
7 growth of the organic sector.

8 This will support an environment
9 conducive to capital investment, organic
10 acreage conversion and an increase in the
11 number of certified organic operations. Thank
12 you.

13 MS. MEYER: Hello, I'm Melody
14 Meyer with Albert's Organics and United
15 Natural Foods.

16 MR. MCEVOY: Okay, Melody, just a
17 second. We're going to queue up the next few
18 people on the list. So we have Julia Sabin,
19 Kelly Shea and Craig Weakley to be queued up
20 next.

21 MS. MEYER: And I am next. I'm
22 up.

1 MR. MCEVOY: Yes, you are next.
2 Begin, Melody, sorry about that.

3 MS. MEYER: All right. Melody
4 Meyer, Albert's Organics, UNFI. It's an honor
5 to be here. Thank you so much to the USDA for
6 really listening. I think an organization
7 that listens does really good work, so thank
8 you. That's really important.

9 As you probably know, UNFI's the
10 largest distributor of natural foods and
11 organic foods in the country and Canada.
12 Albert's Organics is the fresh produce side of
13 that.

14 And I've been with Albert's for 11
15 years, really engaged with lots of small
16 growers, medium-sized growers, helping them
17 market their product all over the country.
18 I've been doing that role and in the business
19 for over 30 years.

20 I'm a member of the OTA board of
21 directors, I sit on the California Organic
22 Products Advisory Committee for the state

1 organic program in California, and I'm really
2 honored to be here.

3 The issue that I wanted to touch
4 on is, really reflects the 25 percent goal
5 that you have in increase in certifications by
6 2015. And in the U.S. there seems to be a
7 trend in the media, in the country towards
8 smaller growers foregoing certification.

9 It's often reported in the media
10 and by the thought leaders that certification
11 is just too complicated and too expensive for
12 small growers.

13 This is concerning for a number of
14 reasons. It's important that organic
15 agriculture not lose the hearts and minds and
16 support of those small growers. We need
17 farmers and local and regional producers.

18 The cost share program really
19 alleviates financial burdens on these small
20 farmers. They should be flocking to the
21 organic program rather than doing the
22 opposite.

1 I believe the long-term health of
2 the sector requires producers of all sizes be
3 participating in the program. Small farms
4 grow and become medium sized farms and that's
5 what really grows our industry. They acquire
6 new outlets and new customers.

7 For large businesses like UNFI and
8 Albert's, it's important to see these
9 entrepreneurial farmers entering the sector
10 and in the domestic market.

11 I remember in the '80s, a small
12 organic strawberry grower that was very
13 entrepreneurial in spirit and said people told
14 him organic strawberries can't be done. And
15 he worked and showed that organic berries
16 could be grown, and now all of the large berry
17 growers use his methods.

18 So it's those small
19 entrepreneurial growers willing to take a risk
20 that can grow an industry.

21 It's concerning that the idea of
22 organic-like production claims are out there

1 as well. The unregulated claims are gaining
2 acceptance in the farming community. Organic
3 is and should continue to be the gold standard
4 with unique market value.

5 I'm also concerned that half of
6 all of our farmers may be retiring in the next
7 decade, and we really want to engage the next
8 generation of producers to become involved
9 with organic certification.

10 So I would urge the USDA to
11 continue to improve awareness of and
12 participation in the cost share program.

13 Our work at the COPAC with the
14 state organic program in California, we keep
15 track of the cost share program, the monies
16 that have been spent, what's left on the
17 table. And I think we need to do more of that
18 across the country, what money is being left
19 on the table in the cost share program.

20 Provide adequate oversight at
21 farmer's markets and other outlets to
22 discourage organic claims, and especially by

1 those uncertified producers that do not
2 qualify for the \$5,000 exemption. So we need
3 to provide enforcement there.

4 Really important is to help make
5 the transition period less of a financial
6 burden for our producers through labeling and
7 other creative incentives.

8 And when I'm out in the field with
9 growers that's one of the many questions,
10 foremost questions I get asked. How do I get
11 through that three-year period? What
12 incentives are there? Is there a label I can
13 use?

14 Let's work together to make
15 organic certification trendy. Let's attract
16 new small growers, medium sized growers and
17 let's attract the next generation of growers
18 to the organic program. Thank you.

19 MR. MCEVOY: Thank you very much.
20 I've just gotten some additional instructions
21 at how we're going to run the show here this
22 morning.

1 So we have a schedule printed with
2 specific times for each person. Is that
3 schedule available up front so people can see
4 that? Yes, good.

5 We're asking commenters to state
6 their name and where they are from, and that's
7 been great. Thank you very much for doing
8 that.

9 There's a five-minute time limit.
10 There's a timekeeper in the front that will
11 raise signs about the amount of time that's
12 left in your comment period.

13 I think everybody is well within
14 that five-minute time period at the current
15 time. We may ask some clarifying questions of
16 the commenters.

17 And so I think that's it.
18 Anything else, Mark? Okay, so the next couple
19 folks up are Julia, then Kelly Shea and Craig
20 Weakley. Thank you.

21 MS. SABIN: Good morning. My name
22 is Julia Sabin, and I'm the Vice President

1 General Manager for Smucker Natural Foods.

2 And I've been engaged in the organic industry
3 since 1983, when I graduated from college and
4 went to work for Knudsen Juice Company.

5 Smucker Natural Foods has been
6 engaged in the organic industry for nearly 27
7 years, and we manage the R.W. Knudsen Family
8 and Santa Cruz Organic brands.

9 We've been a long time supporter
10 of the industry and we have a great admiration
11 and support of the Organic Trade Association
12 whose mission is to grow organic and to
13 protect the standards.

14 I'm also the President of the
15 Board for the Organic Trade Association, and
16 I'd like to thank the USDA for setting up the
17 time to listen to its stakeholders.

18 The Organic Trade Association is a
19 proud supporter of the Healthy Hunger-Free
20 Kids Act, which sets new standards for the
21 quality of food that America's children are
22 served every day.

1 Congress, when passing the Act,
2 signaled its strong support of organic food in
3 schools by authorizing \$10 million for an
4 Organic Pilot Program.

5 The Pilot will prove the
6 feasibility of adding organic foods to school
7 meals by offering competitive grants to school
8 districts that have a high poverty rate to
9 give students opportunities for fresh organic
10 foods.

11 The Organic Pilot Program
12 coincides with the goals of the Farm to School
13 Program and the First Lady's Let's Move
14 initiative, to improve the health of America's
15 children.

16 Because the \$10 million for the
17 Organic Pilot Program is not mandated by the
18 Healthy Hunger-Free Kids Act, we ask that you
19 include the program in your fiscal year 2013
20 budget.

21 We understand the process to
22 initiate a pilot program can take a year or

1 more, and we feel that including the Organic
2 Pilot Program in USDA's fiscal year 2013
3 budget will expedite the creation of the
4 program.

5 These are tough budgetary times
6 and we understand that, for the Department of
7 Agriculture. But please do not let this
8 historic opportunity go unfulfilled.

9 OTA and the industry look forward
10 to working with you to bring the Organic Pilot
11 Program to fruition. Please let us know any
12 assistance we can offer you, and thank you
13 again for your time.

14 MR. MCEVOY: Thanks, Julia. Next
15 we have Kelly. Good morning, Kelly.

16 MS. SHEA: Good morning. My name
17 is Kelly Shea, and I've worked in organic food
18 and farming for about 25 years now.

19 I also serve on the Organic Trade
20 Association board of directors, and as well I
21 serve on FFA's Foundation Sponsor Board. And
22 I'm really happy to report that our blue-

1 jacketed youth are incredibly excited about
2 organic agriculture and sustainable
3 agriculture, and I really want to thank
4 Secretary Vilsack for his support of FFA.

5 He actually had the FFA students,
6 challenged them to bring some Farm Bill
7 objectives forward to him and they were able
8 to do that, and so that was incredibly
9 exciting.

10 So I want to thank USDA for
11 hosting this listening session, and hope that
12 the ideas generated here today are useful to
13 the work of the National Organic Program.

14 The Act and regulations were put
15 in place to ensure consumers that organic
16 products meet consistent standards. The
17 adoption of the Organic Foods Production Act
18 and the implementation of the rule has
19 thankfully led us away from that patchwork of
20 dozens of different certifiers with varying
21 standards. However, there's still work left to
22 do with respect to attaining consistency among

1 certifiers, and Miles knows this is one of my
2 favorite topics.

3 You know, I see this first hand
4 every day because I work with over 600
5 suppliers in 24 states, as well as our
6 organization purchases ingredients such as
7 sugar, cocoa and vanilla from outside the U.S.

8 Certifiers still vary in their
9 approach to the regulations and their approach
10 to compliance and enforcement. Sometimes the
11 variations are fairly benign and at other
12 times more egregious.

13 The existence of the variations is
14 really unfair to the farming and processing
15 community and counter to the purpose of why
16 the National Organic Program was created.

17 I do have to say that the NOP has
18 increased their communications, their
19 enforcement, certifier trainings, and most
20 recently with the introduction of the NOP
21 handbook they are providing the organic sector
22 with central and official resources for

1 current NOP instructions, guidance and policy.

2 But I think that the
3 clarifications need to continue to be
4 provided. And when a clarification is given
5 to an individual certifier, maybe in instances
6 where there's been a non-compliance based on
7 a complaint received by the NOP or where a
8 particular certifier has been requesting
9 guidance, the certifier in receipt of that
10 information might correct their issue or act
11 on the issue.

12 But there could be several other
13 certifiers and maybe a number of certified
14 operations that unknowingly continue the
15 practice because they didn't receive that
16 information.

17 And sometimes the time period
18 between issuance of the clarification to a
19 particular certifier and then official
20 clarification to the public could be lengthy,
21 so if there could be some mechanism for
22 expediting clarification to all certifiers and

1 to the universe of certified entities.

2 And, you know, I had a manager
3 that once said to me, Kelly, you know, don't
4 come into my office and bring me a problem
5 without a solution. So I just wanted to throw
6 a couple opportunities out there.

7 Regular and documented
8 communications between the NOP and then the
9 Accredited Certifiers Association would be
10 great, and then please make those
11 communications available to the public.
12 Because if the NOP knows the answer and the
13 accredited certifiers know the answer, but the
14 operations that are certified or the buyers of
15 organic ingredients don't know it, it doesn't
16 really help us.

17 Also the Accredited Certifiers
18 Association, if they were to bring forward to
19 the NOP some of their top identified questions
20 or concerns, and the NOP could respond to
21 those inconsistencies communicating at the
22 same time to the AC and the public, that would

1 be really helpful.

2 And there's a number of potential
3 means including but not limited to certifier
4 trainings, and we hope the public continues to
5 be allowed to attend those trainings, the NOP
6 newsletter, the website and the handbook.

7 Q&As and several other policies
8 that have been on the NOP website have been
9 taken down since the June 15th notice. For
10 example, the NOP access was very helpful and
11 is missed.

12 And that's not to say that the new
13 website isn't much better, more user friendly
14 and all that, but there is some information
15 that was up there for quite awhile that's not
16 there.

17 So while we understand that
18 policies will be revised and hopefully not
19 significantly as -- you know, we're all doing
20 business based on those policies, and these
21 policies will be incorporated into the
22 handbook.

1 We encourage the NOP to prioritize
2 any significant clarifications that were taken
3 down and have not been added to the NOP
4 handbook. And an important example of that is
5 the Food Contact Substance policy.

6 So I want to thank you so much for
7 your time, and I'd ask as a member of the
8 organic business community not a certifier, I
9 guess I'm not asking, I'm reiterating that
10 clarifications to certifiers should be made
11 public so the community of certified entities
12 could be on board as well. And then lastly,
13 I'd like to urge the USDA to appoint qualified
14 members to the National Organic Standards
15 Board and appoint the 15th member before the
16 upcoming November board meeting. Thank you
17 very much.

18 MR. MCEVOY: Thanks, Kelly. I
19 couldn't agree with you more in terms of
20 needing more consistency and clarification to
21 certifiers.

22 There's still a lot of work to do

1 to provide that consistency in terms of the
2 interpretations of the standards.

3 It's a challenge to do that to
4 notify everybody at the same time, at the same
5 time that we're getting individual situations
6 that we have to deal with through the
7 complaint process.

8 But we're certainly on board with
9 the idea that once there is a clarification we
10 need to inform everybody at the same time.
11 Making that happen is challenging.

12 The question I'd have for you is,
13 you mentioned the food content policy. Are
14 there other policies that from your
15 perspective are priorities for clarification?

16 MS. SHEA: There are. And if
17 you'd like, I'd be more than happy to submit
18 something to the program that lists that out.

19 MR. MCEVOY: Thank you. That
20 would be very helpful, thank you.

21 MS. SHEA: And I do want to say,
22 Mr. McEvoy, you have been a real blessing. We

1 appreciate the work you're doing a lot. We
2 know there's a lot to be done, and anything we
3 can do as a community to help, we'd like to.
4 Thank you.

5 MR. MCEVOY: Thank you.

6 MS. VELTEIS: Good morning, my
7 name is Heather Velteis. I'm with the Foreign
8 Agricultural Service. I'm the Ag Marketing
9 Specialist at the Office of Trade Programs.

10 MR. WEAKLEY: Good morning, and
11 thank you for the opportunity to provide
12 comments to USDA.

13 I'm Craig Weakley, and I recently
14 retired from Small Planet Foods after 22 years
15 of working on the Cascadian Farm and the Muir
16 Glen Organic brands.

17 I now operate a consulting
18 business focused on the organic industry, and
19 currently serve on the board of directors of
20 the Organic Trade Association.

21 I believe it's time for the NOP to
22 address the increasing problem of GMO

1 contamination that organic farmers, processors
2 and consumers are dealing with.

3 Ten years ago GMO contamination
4 was a nuisance and a potential threat to our
5 industry, but today GMO contamination is a
6 substantial threat to the integrity of the
7 organic label, the ability of organic farmers
8 to sell their crops and the ability of organic
9 processors to obtain adequate supplies of
10 ingredients.

11 GMO contamination has also become
12 a heightened concern of organic consumers who
13 are increasingly looking to natural foods
14 retailers to provide assurances that the
15 products they're buying in their stores are
16 non-GMO.

17 I want to recommend three specific
18 action items related to the problem of GMO
19 contamination in the organic industry. First,
20 GMO contamination must be addressed as part of
21 your new proposed rule on periodic residue
22 testing.

1 Periodic residue testing is an
2 important enforcement tool required by the
3 OFPA, and GMO testing must be a part of it.
4 Periodic testing for GMOs is important to
5 assure compliance with the National Organic
6 Standards, and GMO testing will also provide
7 the industry with valuable data about the
8 magnitude of GMO contamination of organic
9 crops, ingredients and finished products.

10 The second action step is that the
11 NOP must begin to work on incorporating a
12 maximum GMO threshold into the organic
13 regulations.

14 The National Organic Standards
15 already contain a maximum threshold for
16 pesticide contamination of organic crops and
17 ingredients, and the reality is, is that the
18 organic marketplace has been operating under
19 a maximum GMO tolerance for many years now.

20 It's now time for the standards to
21 match our marketplace and to incorporate a GMO
22 threshold into our U.S. Organic Standards.

1 OTA endorses this concept and is ready to work
2 with both NOP and the NOSB to accomplish this
3 in the near future.

4 The third action step is that USDA
5 must reduce the resources it currently uses to
6 support and promote the biotech industry, and
7 redirect those resources to support organic
8 farmers and organic food companies.

9 USDA's continued promotion of GMO
10 crops is folly. Let's consider the facts.

11 The biotech industry promised reduced
12 pesticide use, but GMO crops substantially
13 increase herbicide use, they create insect
14 resistance and they create super weeds.

15 The biotech industry promised
16 increased crop yields, but research conducted
17 by USDA and others documents that GMO crop
18 yields are no higher and in some cases
19 actually lower.

20 The biotech industry promised no
21 environmental problems. But science shows
22 that GMOs decrease biodiversity and are

1 harmful to beneficial insects, aquatic
2 organisms and soil-borne organisms.

3 And the increased herbicide use in
4 GMO crops makes conventional agriculture even
5 less energy efficient than it already is.

6 The biotech industry also promised
7 to end world hunger. But researchers in
8 Africa, Asia and Latin America have documented
9 that organic production systems are far
10 superior in increasing yields, providing food
11 security and breaking the chains of poverty.

12 Finally, the biotech industry
13 claims that GMOs are safe to eat. There is no
14 scientific basis for this claim. Adequate
15 testing has simply not been done on GMOs.

16 The limited animal research that
17 has been conducted shows that harmful health
18 effects occur when animals are fed a GMO diet.
19 And researchers have recently found the Bt
20 toxin from GMO crops has contaminated the
21 bloodstream of adults and unborn children, a
22 human health concern that the biotech industry

1 told us simply could not happen.

2 It's time for USDA to drop its
3 support of biotechnology's false promises and
4 marketing rhetoric.

5 It's time for USDA to lend more
6 meaningful support to organic farmers who use
7 food production practices that avoid toxic
8 pesticides, benefit the environment, sequester
9 carbon, reduce soil erosion and provide
10 nutritious, wholesome food to consumers.

11 It's the right thing to do and now
12 is the right time to do it. Thanks.

13 MR. MCEVOY: Thanks, Craig. Next
14 up we have Leslie Zuck.

15 MR. LIPSON: Miles?

16 MR. MCEVOY: Oh, next up we have
17 the Deputy Secretary Merrigan.

18 MR. LIPSON: All right, we'll
19 resume public comments in a few minutes. But
20 now getting back to what was delayed from the
21 opening of the program, the Deputy Secretary
22 of the United States Department of

1 Agriculture, Kathleen Merrigan.

2 DEPUTY SECRETARY MERRIGAN: Good
3 morning, everybody. I'm really just here to
4 welcome you all to really what is an historic
5 listening session here at USDA.

6 I thank you for taking your time
7 and learning how to talk really, really
8 quickly so you get everything you need to say
9 in your five minutes.

10 Not easy, but I understand we're
11 also taking written comments as well. So if
12 there's excess to the five minutes, we
13 certainly have a process to take in those
14 comments and share them.

15 And as I was coming over here in
16 the tunnel that connects these two buildings,
17 I ran into our Undersecretary for Research,
18 Education and Economics, Cathy Woteki, who is
19 sitting in listening to a number of comments.

20 Got my colleagues here on this
21 panel, and you'll see different officials from
22 USDA stream in at different points throughout

1 the day. Get to know them.

2 I think it's a good thing that
3 they're here listening to you all. And Mark
4 and Miles and the team will figure out ways to
5 transmit all that's heard at this session to
6 the broad array of officials in the
7 Department.

8 We're really interested in what
9 the organic community has to say, in part
10 because -- and Mark may have noted this in his
11 opening welcome.

12 We've put a mandate into our
13 strategic plan. We have a performance
14 objective here at USDA that requires all of
15 our managers, all of our folks to figure out
16 how we're going to facilitate a 25 percent
17 increase in the number of certified U.S.
18 organic businesses from 2009 to 2015.

19 That's a big, big -- what do they
20 call them, the hairy, audacious goal, whatever
21 those things are.

22 But I mean that's a big, big

1 challenge, isn't it, particularly in a time
2 when the economy's not great and everyone's
3 struggling to figure out how to get new people
4 on our working lands with the average age of
5 retirement, every farmer's retiring and all
6 that.

7 So we really need your creative
8 ideas here today. One of the things that I
9 said early on in my tenure as Deputy, and I
10 said it at the very first NOSB meeting that
11 was held when I was Deputy, Miles was coming
12 in, was that we have put all of our organic
13 wishes, thoughts, policy issues on top of the
14 shoulders of the National Organic Program.
15 They've done a good job.

16 But they need to get out from all
17 of that and do the job that they're designed
18 to do, and then everyone else at USDA needs to
19 stand up tall and take on the APHIS issues,
20 the NRCS issues, the AMS issues, the FNS
21 issues.

22 This is big Department with a lot

1 of different agencies, and we have a working
2 group that involves all the different
3 agencies, and we're trying to do a deep dive
4 in all of the different mission areas to
5 figure out, how are these different agencies,
6 how are a variety of programs going to help
7 facilitate that goal, that 25 percent goal
8 that's in our strategic plan?

9 So I really appreciate you taking
10 the time from busy lives, and upcoming Expo in
11 Baltimore that's going to be a lot fun I hope,
12 to spend time with us today and share your
13 very best input.

14 And that's really, Mark, all I had
15 to say. I just wanted to welcome people. And
16 unfortunately I can't stay because the
17 Secretary's calling me back.

18 I snuck out when he was mid-
19 sentence. I don't think he gave me the nicest
20 look. And I said well, I've got somewhere
21 very important to go to.

22 There's a lot of goings on right

1 now between the budget -- aaah -- between the
2 Farm Bill, maybe in the next couple weeks
3 really they're talking about writing a Farm
4 Bill on The Hill, do you realize that? It's
5 so fast moving.

6 I was over at OMB yesterday
7 presenting our FY'13 budget proposal and what
8 that needs to look like. That comes out from
9 the president in February.

10 At the same time I'm talking to
11 our appropriators on The Hill because they're
12 trying to finish off FY'12. We're going to
13 have a continuing resolution hopefully this
14 week, but then we hopefully will finish up our
15 appropriation bill for FY'12 in October.
16 We've got the super committee. And then
17 yesterday as you all may know, the president
18 gave a speech in the Rose Garden talking about
19 his deficit reduction plan which included a
20 lot of different pieces for agriculture, in
21 our conservation portfolio, our crop insurance
22 portfolio, and direct payments.

1 So these are a lot of changes that
2 are hitting this institution all at once, and
3 we are trying to stay up on our feet while we
4 are navigating it and we appreciate your
5 patience.

6 And just again to understand that
7 given all of that change that we're managing
8 we haven't lost sight of the importance of the
9 organic sector.

10 We see this as an area where we
11 see economic success stories, we see a lot of
12 youth.

13 Some of your younger beginning
14 farmers are really enthused about organic, and
15 so we will be talking about that in the
16 context of what goes on in the next few months
17 in terms of how are we going to move forward
18 and repopulate rural America with people who
19 want to be there and people who will succeed.

20 So good luck with your great work.
21 Thanks for organizing, guys, and listening.

22 MR. MCEVOY: Okay, thank you very

1 much. Okay, we have a few people left until
2 our first break. We have Leslie Zuck, and
3 then Karine Bouis-Towe, sorry for the
4 mispronunciation, Carmela Beck and Leslie
5 Goldman.

6 MR. SMITH: And I want to say good
7 morning. I'm Matt Smith. I'm a national
8 program leader in Natural Resources and
9 Sustainable Agricultural Systems for the
10 Agricultural Research Service.

11 MS. ZUCK: Hello, I'm Leslie Zuck.
12 I'm the Executive Director of Pennsylvania
13 Certified Organic. I'm the President of the
14 Accredited Certifiers Association, and a
15 member of the Organic Trade Association board.

16 So I have a few hats that I wear,
17 put them on and off at various times. So I
18 put my PCO hat on and I asked my staff, I'm
19 going down to Washington and I'm asked to tell
20 them about our priorities. And so I asked
21 them for a list, and here's what I got.

22 How to pay for residue testing?

1 Could some of the cost share money go toward
2 that, especially the leftovers that's not
3 being used?

4 Two, equivalency with the European
5 Union Organic Standard. Three, training
6 programs for accredited certifiers and their
7 certification staff.

8 And part of that was I'd say 3a,
9 3b, would be consistent materials review among
10 Accredited Certifiers Association, accredited
11 certifiers, ACAs, agencies.

12 And then of course I always get
13 the crisis of the day, which that day happened
14 to be a farmer lost his certification because
15 he used a synthetic fertilizer that was
16 labeled organic all over it, and it was sold
17 to him as an organic fertilizer.

18 I know he should have checked, but
19 -- and that's not, you know, and that's a
20 difficult one, but I had to relate that to you
21 because it's one of those things we deal with
22 from time to time.

1 With my ACA hat I got a similar
2 list. Number one, funds for residue testing,
3 heard that before.

4 Number two, certification training
5 programs and how they could be more available
6 to more certifiers through webinars or, you
7 know, some way that we can get certifiers that
8 don't attend the training or can't afford to
9 send much staff to the training, they need
10 that consistent training as well.

11 Funding for NOP in general. We
12 want to keep you all doing your work and
13 improving, you're doing a great job, and
14 figure out how we can make sure that that
15 happens when the time comes.

16 We heard something about budget
17 today, yes. The cost share program, continue
18 the cost share program, materials review
19 consistency.

20 More help with understanding and
21 implementing our relationship with the Canada
22 Organic Standard and that, you know, how

1 that's going, how do we do that?

2 And number six was quicker
3 enforcement of complaints and appeals, and we
4 have seen a lot of improvement in there. I
5 know the program's been talking about that
6 too. I'm sorry I missed the introduction. I
7 was in traffic.

8 So just an economic success story
9 I want to -- I like that word that Kathleen
10 used. The importance of the cost share
11 program, the certification cost share program
12 is really huge.

13 And I was going to say it creates
14 jobs but, you know, we hear a lot about jobs
15 these days, and when I went up on The Hill
16 last April that's what I was told, that's all
17 anybody wants to hear about so it has to
18 relate to jobs.

19 PCO is a really tiny, small
20 nonprofit organization in a really small, tiny
21 village in a rural area of Pennsylvania. It's
22 beautiful there, about four hours directly

1 north of here.

2 And in ten years we have created
3 17 jobs with full benefits in a town of just
4 over a thousand people. We added one job this
5 year, two jobs last year and two jobs the year
6 before, full time jobs with benefits.

7 That's about 15 percent over that
8 period of time, and if you consider, I don't
9 know, the growth in the organic industry it's,
10 you know, still very strong.

11 In addition to the office staff,
12 we hired 25 inspectors in the ten years that
13 we've existed in that area, and we hired four
14 new inspectors this year and four new
15 inspectors last year.

16 That's a 20 percent growth rate, a
17 15 percent growth rate for our office staff,
18 and I've heard similar stories from other
19 ACAs.

20 So, you know, I don't have time to
21 list all of the ways that our small
22 organization also contributes to the

1 community.

2 Like, you know, we pay rent to a
3 community center, so that community center now
4 has the ability to use our funds to provide
5 community services and have that building open
6 for other folks in the area to use.

7 And I just, you know, a strong
8 agriculture industry we know is the foundation
9 of a strong economy. We can't lose sight of
10 that. That's really important for everyone
11 who is working on our budget to know.

12 And that little tiny bit of cost
13 share money, \$750 per farmer, will help us
14 stay strong and continue to grow.

15 Of course all those new employees
16 that are filling those new positions also have
17 to have training, and so certification staff
18 training is another area that we would like to
19 see additional work on.

20 It's a long list, sorry. It's
21 probably nothing real new though.

22 MR. MCEVOY: It's a good list

1 though.

2 MS. ZUCK: Thank you.

3 MR. MCEVOY: Thank you, Leslie.

4 Hold on just a minute here. We're
5 welcoming Darci Vetter to the panel.

6 MS. VETTER: Yes, good morning.
7 I'm Darci Vetter, the Deputy Undersecretary
8 for Farm and Foreign Ag Services here at USDA.
9 So sorry to be joining you a little late this
10 morning, but squeezing in after another
11 meeting, so glad I could be here. Thanks.

12 MR. MCEVOY: Okay, next up we have
13 Karine Bouis-Towe, Bouis-Towe. Thank you.

14 MS. BOUIS-TOWE: Hi, my name is
15 Karine Bouis-Towe. I represent a new
16 coalition formed in August 2011, called Farm
17 Food Freedom Coalition.

18 We will engage the public through
19 education, outreach, lobbying and legal
20 action. We are a group of concerned consumers
21 and farmers who partner with like-minded
22 organizations on issues such as the USDA

1 Organics Program.

2 We are concerned with the
3 standards that the USDA Organic Program puts
4 out regarding organic animal products. To us
5 organic stands for natural and natural means
6 the way nature intended animals to eat and
7 live.

8 We believe the current standards
9 have been compromised to accommodate
10 industrial agriculture, and need to be
11 tightened to follow the values that organic
12 implies and should uphold.

13 In addition, we are concerned with
14 the intense scrutiny bordering on
15 criminalization of independent American
16 farmers, which is currently taking place
17 especially for unprocessed or raw milk
18 farmers.

19 A documentary called Farmageddon
20 exposes actions by the USDA that show armed
21 raids of peaceful family farms. What happened
22 to civility and diplomacy? Why does our

1 government even raid farms, especially armed?

2 The movie also highlighted that
3 the justification of the raids on these farms
4 lacked peer reviewed science and proof of the
5 allegations, which put at least one farmer
6 completely out of the sheep business.

7 We support independent peer
8 reviewed science that have no association to
9 the industry under study. Full disclosure of
10 industry connections should be included in any
11 publication.

12 There is excess demand for organic
13 local foods and a growing consumer demand for
14 unprocessed, pasture-raised animal products.

15 Currently the USDA and FDA are
16 hindering this market expansion when they
17 should be protecting, preserving and helping
18 to expand these options, because these options
19 build local economies and provide well paying,
20 skilled jobs and they protect our freedom of
21 choice and ultimately preserve and promote
22 good health and the environment.

1 The Farm Food Freedom Coalition is
2 currently working with researchers at the
3 University of Maryland to evaluate the
4 participants of this market and compare this
5 niche with the population as a whole.

6 We have unique access to this
7 consumer base due to our collaboration with
8 buying clubs across the U.S. that purchase
9 food directly from farmers. We would gladly
10 share these results with you.

11 We believe that food should be
12 natural and should promote health. We believe
13 the organic standards should be tougher, and
14 we believe that the USDA needs to utilize
15 their massive resources and expertise to
16 preserve and promote independent farming, not
17 just promote centralized food production.

18 The perceived efficiencies of a
19 centralized food system ignore the
20 externalities or true costs to the environment
21 and human and animal health.

22 This includes developing programs

1 that provide young farmers the opportunity to
2 purchase or farm when they otherwise could not
3 afford to.

4 And by the way, there is a booming
5 apprenticeship program within the biodynamic
6 agriculture community. There are lots of
7 farmers waiting to find land to farm on in a
8 way that will restore the environment and the
9 health in that community.

10 We are deeply concerned about the
11 human experiment that is taking place
12 regarding GMOs in our food supply. We know
13 the impact on animals includes loss of
14 fertility and strong immune responses.

15 If that isn't enough to bring
16 precaution to everyone making decisions at the
17 policy level, we believe that your group needs
18 to stay the course to continue to push against
19 corporations like Monsanto who are so vested
20 in GMO products that our government officials
21 are heeding to their quest to dominate all
22 commodity crops.

1 We are currently losing this
2 battle, with the latest conversion alfalfa
3 crops, a crop that has no reason to go GMO.

4 We shouldn't allow the main source
5 of nutrition in our animals to be something
6 not proven safe, never mind the fact that we
7 shouldn't be feeding these grains to animals
8 in the first place.

9 We are already in a dangerous
10 situation with animal factory farming,
11 antibiotic-resistant bacteria and virulent
12 strains of disease that can and will pass to
13 humans at some point.

14 Now we are further compromising
15 these animals with known and unknown effects
16 of GMOs. We are deeply disappointed in our
17 government which no longer serves the people
18 in many aspects.

19 For today's discussion it's the
20 feed industry. Our federal and local
21 government agencies are consistently working
22 with large industry, and needs to become more

1 aware of the independent farmers' needs so
2 policies can be created fairly for the market
3 being regulated. One size doesn't fit all in
4 agriculture.

5 Furthermore, we feel these
6 agencies have been compromised by the
7 revolving door which exists between industry
8 and government regulators.

9 The results of this revolving door
10 are decisions being made with a disregard for
11 human impact, but rather for bottom lines and
12 progress.

13 This results in a failure to
14 protect our nation's people, environment and
15 the future. Thank you.

16 MR. MCEVOY: Yes, excuse me,
17 Karine.

18 MS. BOUIS-TOWE: Yes.

19 MR. MCEVOY: One of the first
20 points you made was about organic animal
21 products and the standards. Do you have any
22 specifics on that of the part of the standard

1 that --

2 MS. BOUIS-TOWE: Well, for
3 example, the grain feeding, the organic grain
4 feeding. Since we consider organic to be
5 natural, many of the animals, especially
6 ruminants, belong on pasture.

7 And so, yes, we would accommodate
8 some grain feeding to do things like more milk
9 production in some cases, but we don't think
10 that a majority of their diet should be grain.
11 It should be what nature intended them.
12 Ruminants should be consuming pasture.

13 MR. MCEVOY: Okay, so the pasture
14 rule that was implemented this past year or so
15 does not meet your perspective?

16 MS. BOUIS-TOWE: Do you know what
17 percent pasture and outdoor time that
18 includes? Because pasture also implies a
19 certain amount of outdoor time.

20 Chickens are another example of
21 that where they have a window to the outside,
22 but not living outside.

1 MR. MCEVOY: Okay. Well, I guess
2 I would encourage you to take a look at the
3 current pasture rule, the changes to that, and
4 if you have any specific comments on that we'd
5 love to hear it.

6 MS. BOUIS-TOWE: Okay, thank you.
7 I will do that.

8 MR. MCEVOY: Thank you. Okay,
9 next up we have Carmela Beck. Carmela here?
10 Oh, here. Hi.

11 MS. BECK: Good morning. My name
12 is Carmela Beck, and I am one of the organic
13 strawberry -- excuse me, one of the organic
14 certification managers at Driscoll's
15 Strawberry Associates headquartered in
16 Watsonville, California.

17 I've been active in the organic
18 community since 2004, originally working for
19 an organic certifier and most recently working
20 as a liaison to organic growers with regards
21 to certification issues.

22 I wanted to thank you for this

1 opportunity to be here today. Driscoll's is
2 a distributor of berries. We distribute
3 organic and conventional strawberries,
4 raspberries, blackberries and blueberries.
5 And we have been growing our organic program
6 quickly over the last couple of years.

7 However, we would actually like to
8 be growing it a lot quicker than we are. And
9 so that's one of our goals to make happen.

10 Let's see, we are breeding for
11 organic production practices by geography, for
12 disease resistance, vigor, quality and general
13 adaptation to organic production.

14 Driscoll's organic production
15 handling facilities are certified organic to
16 the NOP, and we are registered with the CDFA
17 registration program.

18 We find that the NOP program has
19 met our needs and that our certifier, CCOF,
20 has served us well as a certification agency.
21 I'll go ahead and just launch into my
22 comments.

1 We found that the CDFA program
2 generally seems redundant to the NOP program,
3 and the costs are significant to some of our
4 family farm operations. We found that it's a
5 duplication of paperwork and costs.

6 And while we appreciate that over
7 the past year there's been a reduction of
8 paperwork, we feel that there's more
9 opportunities to streamline that process.

10 Additionally, we've found that the
11 NOP program has been very responsive in the
12 last few years and we're grateful for that.
13 We've found that the materials review process
14 has worked very effectively to approve
15 products, for products approved by the NOSB to
16 get them moving through the regulatory
17 process.

18 One specific example was the
19 approval of the sulphur burner, which many of
20 our organic growers have been able to use, and
21 we see instant results.

22 Let's see, additionally the

1 process for the comments, for providing
2 comments to draft guidance is greatly
3 appreciated.

4 Our most recent example that has
5 affected Driscoll's is the comments on the
6 organic plant material guidance. We believe
7 that this process will lead to clear
8 enforcement and a timeline that will allow for
9 regulated parties to implement change as
10 needed.

11 Research programs and projects
12 that are supported via the USDA programs are
13 highly valuable to Driscoll's.

14 In Watsonville, California, on the
15 California Strawberry Commission test plot
16 that's run by Joji Muramoto, Carol Shennan and
17 Steve Fennimore, they're doing a trial with
18 anaerobic soil disinfestation and steam trials
19 that can be applied to organic production,
20 which we're looking forward to.

21 Any other research on pest
22 management would be highly valuable, including

1 biological controls on new low impact organic
2 approved chemical treatments would be helpful.

3 We're still faced with issues
4 including the light brown apple moth, spotted
5 wing Drosophila and other basic pest issues
6 like mite control and aphid control.

7 In general for Driscoll's growers,
8 the financial based incentive programs are not
9 a huge value. We appreciate the certification
10 cost share program, but we'd rather see other
11 cost barriers such as the CDFA organic
12 registration fees be removed.

13 And while the NRCS transition
14 programs are fabulous, typically we've found
15 them to be very paper heavy and difficult to
16 get through the process.

17 So that concludes my comments, and
18 I wanted to thank you again for the
19 opportunity to be here today.

20 MR. MCEVOY: Thank you very much.
21 Okay, next up before the break is Leslie
22 Goldman. Okay, Leslie Goldman I guess, Leslie

1 Goldman is not here -- is here. Oh, there's
2 Leslie. Thank you, Leslie.

3 MR. GOLDMAN: It's an honor to be
4 here. My name is Leslie Goldman. I'm called
5 the Enchanted Gardener. I live in San Diego.

6 On Sundays of every week I wear
7 this very proudly. Numbers of our farmers
8 there have the USDA certification label, so I
9 feel quite at home here at headquarters.

10 I just want to say that I owe my
11 allegiance to conventional medicine. I was
12 crippled in my life, however, if it had not
13 been for the wisdom of organic, which has
14 existed for more than 8,000 years, past,
15 future and through our great friends here in
16 the organic field.

17 And to our allegiance to Tom
18 Vilsack, who did a wonderful job with The
19 People's Garden I visited yesterday for a
20 number of hours. I made friends with the
21 staff.

22 I just want to say that I'm

1 volunteering to be your Enchanted Gardener for
2 The People's Garden. I'm doing this because
3 I want to see that program grow.

4 Tom Vilsack started The People's
5 Garden by saying it was going to be organic.
6 There would be no fertilizers. There would be
7 no pesticides. I was out there yesterday
8 enjoying the ray.

9 I want to introduce you to a
10 couple of my other friends. This is my
11 solution for the national dilemma. This is
12 Keep the Beet Media Star, the world's first
13 talking beet plant.

14 You get a beet from an organic
15 farmer, you repot it, you grow the greens, you
16 regain your confidence that you can grow your
17 own food.

18 That is the secret of a nation of
19 gardeners. This is what we need. We will be
20 making better decisions. We will be making
21 better decisions now as we get our beet back
22 with nature. That in essence is the problem.

1 Can I hear a hip, hip, hooray on
2 that, please?

3 PARTICIPANTS: Hip, hip, hooray.

4 MR. GOLDMAN: Okay, I didn't hear
5 that. Can I hear a hip, hip, hooray?

6 PARTICIPANTS: Hip, hip, hooray.

7 MR. GOLDMAN: All right, so that's
8 what I'm here for. I'm your Enchanted
9 Gardener. I'm here to honor what we are
10 doing.

11 This is the magic box. This
12 contains the dreams of humanity. In this box,
13 I've just got to tell you all, it's going to
14 come out really, really good.

15 This right here is another friend
16 of mine. This is organic alfalfa growing in
17 a container that eliminates Styrofoam. I just
18 want to tell you everything's going to be
19 good.

20 I planted seeds with Dr. Robert
21 Fraley a couple of years ago at the National
22 Science Conference. As some of you know, he's

1 the father of Roundup Ready.

2 We said we would have a dialogue
3 to lessen the tension between organic and GMO
4 levers. I need to say that Roundup Ready,
5 they gave it a good shot but GMO cannot save
6 organic or the world or feed the hungry.

7 We might as well have an honest
8 dialogue on science, ethics and food. He's a
9 great man. I thank him for planting organic
10 seeds with me, but I'd recommend that my dear
11 friends at Monsanto get on the program, start
12 funding some of the organic programs because
13 that's the future.

14 I want to leave you with a couple
15 thoughts. Soil depletion, it was put in a
16 Senate report, 1936, that our vegetables and
17 fruits could no longer feed us.

18 Soil depletion, that's a principle
19 of organic. We must build up the soil. We
20 will regain the future by building up the
21 soil, learning the principles, regaining our
22 health.

1 The future is ours and I'm glad to
2 accept that post and get it out. My niece
3 calls me Uncle Leslie at Hamilton High School.
4 There are kids all over this country that want
5 to be part of the people's project.

6 I want to salute all of you and
7 Tom Vilsack and all the great people for USDA.
8 Let's all work together. The time is now for
9 our children. Let's move organic forward.

10 MR. LIPSON: Thanks very much. We
11 are running ahead of schedule because we did
12 start a bit early.

13 What I'd like to do is just take a
14 couple of minutes right now to ask the other
15 USDA personnel who are in the room sitting in
16 the audience, to use these microphones in the
17 middle of the room and just introduce
18 themselves.

19 Say hi, who they are, so that the
20 stakeholders who are here might be able to
21 spot somebody that they need to talk to and
22 know who you folks are, because this is my

1 Organic Working Group and they're really the
2 folks who are doing the trench work to make
3 things succeed.

4 We can use both microphones there.
5 So just tell us who you are and where you
6 work.

7 MR. SMITH: I'm Steve Smith, with
8 the National Institute of Food and Agriculture
9 and I'm the national program leader for Animal
10 Production Systems and have responsibility for
11 our OREI, Organic Research and Extension
12 Initiative, as well as the Organic Transitions
13 Programs, which is our grant programs that
14 support the research in the organic area.

15 MS. O'REILLY: I'm Megan O'Reilly.
16 I'm a programs specialist at NIFA. I work
17 with Steve on Organic Research and Extension
18 Initiative and Organic Transitions.

19 MS. KOSCO: I'm Shari Kosco. I'm
20 with the Foreign Agricultural Service, and I'm
21 responsible for analyzing world supply and
22 demand of organics.

1 MR. THOMAS: Bill Thomas. I am
2 with the Alternative Farming Systems
3 Information Center at the National
4 Agricultural Library in beautiful Beltsville,
5 Maryland.

6 We provide a number of information
7 services on organic agriculture, sustainable,
8 anything that can be considered alternative to
9 whatever conventional is.

10 We're on the Web. You can find us
11 under AFSIC, A-F-S-I-C. Thank you.

12 MS. AHRAMJIAN: Hi, I'm Lisa
13 Ahramjian. I'm the publications manager at the
14 National Organic Program. Thanks, everyone,
15 for coming.

16 MS. WINKLEBLACK: Hi, I'm Katie
17 Winkleblack, and I also work for the
18 Alternative Farming Systems Information
19 Center.

20 So I'm a librarian who is here to
21 help farmers, consumers, researchers find
22 access to information on organics, on

1 sustainable farming, anything that's
2 alternative, like Bill said, so thank you.

3 MS. RAKOLA: Hi, I'm Betsy Rakola.
4 I'm with the National Organic Program. I
5 manage the organic certification cost share
6 programs and I also work with the
7 Accreditation and International Activities
8 Division.

9 MR. ROSE: Mark Rose, I'm with the
10 Natural Resources Conservation Service. I'm
11 the Team Leader and National Program Manager
12 for the Environmental Quality Incentives
13 Program.

14 MS. HARTLEY: Hi, I'm Julie
15 Hartley and I'm with the National Organic
16 Program with the Accreditation and
17 International Activities Division. Thank you
18 for coming.

19 MS. LANGE: Hi, I'm Audrina Lange.
20 I'm with the Agricultural Marketing Services
21 Fruit and Veg Market News. We actually
22 provide market information on a daily basis on

1 organic and conventional fruits and
2 vegetables.

3 And we have a table out here and
4 we have all kinds of information for you if
5 you want to drop by and get some.

6 MR. GRAF: I'm Eric Graf. I'm
7 with the dairy programs area of Agricultural
8 Marketing Service.

9 As David Shipman mentioned, our
10 focus is to enhance the marketing of dairy
11 products within this specter, and we help to
12 support the strategic plan effort to increase
13 organic operations.

14 We've been told a number of times
15 that the market information, the price
16 information, the information about increased
17 sales is helpful to new dairy farmers, for
18 example, in getting bank financing, making
19 bankers aware of the vitality of this
20 industry. So that's what we work on.

21 MS. HESTVIK: Good morning. I'm
22 Sharon Hestvik, and I'm with the USDA Risk

1 Management Agency. I'm a Senior Agricultural
2 Management Specialist.

3 I focus on organics, small farms,
4 and we provide organics since 2001, and we
5 have four new prices for organic on corn,
6 cotton, processing tomatoes and soybeans. And
7 for 2013, we're actually offering a new price
8 on avocados in California. Thank you.

9 MR. GAYNOR: Hello, Joe Gaynor
10 with AMS dairy programs. I run the market
11 information branch. We disseminate
12 information for both conventional and organic
13 dairy products and milk. Thanks.

14 DR. TUCKER: Good morning, I'm
15 Jenny Tucker. I'm an Associate Deputy
16 Administrator with the National Organic
17 Program. Welcome, everyone.

18 MS. HAMM: Good morning. I'm
19 Shannon Hamm. I'm the Associate Deputy
20 Administrator for Policy and Program
21 Development in the Animal Plant Health
22 Inspection Service, and appreciate all the

1 comments this morning. Thank you.

2 MR. GOLDMAN: I just need to say
3 one brief thing. All my comments are on
4 Plant Your Dream USDA Peptalk. They're
5 already online with pictures, and my concrete
6 proposals are online, you can go there.

7 MR. LIPSON: Thanks, everyone. We
8 are scheduled to be on break until 11
9 o'clock, so I guess we'll take that extra
10 time.

11 If you need to get some caffeine
12 or other similar intake that is available in
13 the cafeteria which is down the hall.
14 That'll be out to the right, and then in Wing
15 3 is the entrance to the cafeteria.

16 You need to make sure that you
17 keep your conference name tag with you. If
18 you don't have one, Lisa or Betsy can make
19 sure that we give you one. They're in the
20 back there.

21 If anybody has come in to give
22 testimony today who isn't already registered,

1 please let us know that and we'll put you on
2 the schedule.

3 I want to thank everybody who has
4 made comments. We really very greatly
5 appreciate it and thank very much the folks
6 who have been our listening panel. I think
7 they've been paying close attention and have
8 gotten some great information.

9 So please be back here right
10 before 11:00. We've got plenty of time to
11 get back here right before then.

12 There is some organic food in the
13 cafeteria, yes. You'll be able to find
14 something.

15 (Whereupon, the foregoing matter
16 went off the record at 10:32 a.m.
17 and resumed at 11:02 a.m.)

18 MR. LIPSON: Welcome back,
19 everyone. Thank you for coming back
20 promptly. Is Angela Owen here, our next
21 registered commenter? All right, well, if
22 Angela shows up we'll move her back in.

1 So the next commenters will be
2 Michael Sligh, Charlotte Vallaeys, Laura
3 Batcha and George Bass. So welcome, Michael.
4 Excuse me one second before you start.

5 I'd like to just get
6 reintroductions of our next listening panel
7 here, so we'll just go to my left, introduce
8 yourselves.

9 MR. SMITH: Hi, I'm Steve Smith,
10 the National Program Leader for Animal
11 Production Systems within the National
12 Institute of Food and Agriculture, and I have
13 responsibility for the Organic Research and
14 Extension Initiative as well as the Organic
15 Transitions Program.

16 MR. ROSE: Mark Rose, I'm with the
17 Natural Resources Conservation Service,
18 National Program Manager and Team Leader for
19 the Environmental Quality Incentives Program.

20 We've had the last three years
21 transitioning to organic and certified
22 organic financial assistance to producers,

1 about \$23 million to \$25 million a year have
2 been obligated to those.

3 MS. KOSCO: I'm Shari Kosco with
4 the Foreign Agricultural Service in the
5 Office of Global Analysis, and I analyze
6 trade trends and production and supply/demand
7 for organics and a number of other products.

8 MR. LIPSON: Okay, thanks.
9 Michael, go ahead.

10 MR. SLIGH: Good morning, Michael
11 Sligh, Rural Advancement Foundation
12 International. We're based in Pittsboro,
13 North Carolina.

14 I certainly applaud the goal of
15 increasing the number of organic farms by 25
16 percent. I think there's five or six things
17 that the agency could do that would help
18 facilitate that direction.

19 One is, I think this cross-agency
20 coordination, the development of a USDA
21 organic action plan to create synergy across
22 the Departments would do a lot to make that a

1 greater reality.

2 We've seen over time good movement
3 in that direction, but we would love to see
4 an action plan and make that public and make
5 it a way that we can help encourage that more
6 concretely.

7 Secondly, we think that without
8 creating a reinvigoration of public plant and
9 animal breeding so that we have regionally
10 and site specific germplasm in animal breeds,
11 we cannot grow this direction in agriculture
12 as fast as we need to.

13 This is something we hear across
14 the sectors and something that is, urgently
15 need to create public cultivars so they're
16 available to organic farmers in their region
17 and locally adapted. The same with animal
18 breeds.

19 Thirdly, we think that this issue
20 of the APHIS rule and the biotech regulation,
21 I think it's about eight years in the
22 waiting. I'm aware of 140 groups that have

1 written the Secretary urging this to come
2 forward in a timely manner.

3 We need rationality in the marketplace.
4 That's one way to do that by creating a sound
5 regulation that addresses GMO contamination
6 in the places where it is not supposed to be
7 occurring.

8 Thirdly, we think that -- and I'm
9 sorry Miles is not here. I know he's making
10 progress on the oversight of USDA recognition
11 by NIST of the accreditation program.

12 Because if the accreditation
13 program is both rigorous and consistent, that
14 helps make the certification more rigorous
15 and consistent.

16 So getting that recognition by
17 NIST, I know they're working on it, but that
18 should be an ongoing activity by the
19 Department that would help put the organic
20 program as a world class leader in terms of
21 accreditation.

22 We also think that the issue of

1 the APHIS rule in terms of creating fair
2 contracts for farmers is something that if we
3 want to grow organic agriculture we need to
4 ensure that they're fair contracts.

5 This is a rule that also seems to
6 be slow coming off the blocks. We would love
7 to see a strong APHIS rule that would get at
8 this issue of fair contracts for farmers.

9 We also want to talk a little bit
10 about this issue of farmers and paperwork and
11 the burden, and what we really envision with
12 the organic program was if you were able to
13 have more of a one-stop approach.

14 You should be able to go in with
15 your organic, you know, farm plan and also be
16 able to get access to the EQIP program or to
17 the -- you know, any of other USDA agencies.

18 We'd like to see this become a
19 reality so that farmers could get cross
20 compliance and cross acceptance into multiple
21 USDA programs opposed to being so stove
22 piped.

1 We think that's a real barrier, I
2 mean the credit issue needs to be tied to
3 that. It should be, we envisioned that the
4 farm plan was a tool and not a paperwork
5 burden.

6 So we'd like to see that to be a
7 very active and progressive thing that links
8 agencies across USDA. And another example of
9 how that could work is on the research topic.

10 We see issues coming up before the
11 NOSB, but they're decoupled from the research
12 agenda at USDA. Take fire blight in apples,
13 for instance.

14 We need root stock that is
15 resistant to fire blight for this direction
16 in agriculture. We need other solutions to
17 fire blight as the NOSB removes existing
18 tools from that portfolio.

19 So it should be linked cross-
20 agencies so when you see this research need,
21 link it to the Standards Development as well
22 so they move progressively through time.

1 So I guess the last thing that we
2 were really hoping to see out of the agency
3 in this period was, there was a joint USDA-
4 DOJ set of hearings about concentration in
5 agriculture.

6 And we were hoping to see some
7 output from USDA, something to say, here's
8 what we're going to do to address
9 concentration in agriculture. Because if
10 we're going to decentralize and diversify
11 agriculture, we need to take on this
12 consolidation issue very seriously.

13 So that's my comments. I thank
14 you for your time.

15 MR. LIPSON: Michael, when you're
16 referring to the fair contracts, you were
17 talking about the APHIS rule. I think you
18 meant the GIPSA rule, correct?

19 MR. SLIGH: Yes, yes.

20 MR. LIPSON: Thank you.

21 MR. SLIGH: Anybody else? Okay,
22 thanks.

1 MR. LIPSON: Thank you. Next up,
2 unless Angela has arrived, would be
3 Charlotte.

4 Cathy, would you like to introduce
5 yourself briefly?

6 MS. GREENE: Sure. I'm Cathy
7 Greene. I'm with USDA's Economic Research
8 Service, and I've worked on the adoption of
9 organic home systems in the U.S., a little
10 bit on marketing, and right now I'm working
11 on risks in agriculture.

12 MR. LIPSON: Thank you. Go ahead,
13 Charlotte.

14 MS. VALLAEYS: Hi. My name is
15 Charlotte Vallaeys. I'm the Director of Farm
16 and Food Policy with the Cornucopia
17 Institute. We are a policy research group
18 with over 4,000 members, and the majority of
19 our members are organic farmers.

20 Thank you for holding this
21 session. We've seen some great changes which
22 we appreciate very much, but we were also

1 promised the age of enforcement. This has
2 been extremely disappointing.

3 Consumer confidence in the organic
4 label is paramount to the industry's
5 continued growth. Yet an increasing number
6 of companies and their certifying agents are
7 doing serious harm to the trustworthiness of
8 the organic label by adding unapproved, non-
9 organic and synthetic substances to their
10 products.

11 The rule only has meaning if it is
12 enforced. I brought this can of baby food.
13 I have a one year old. I spend a lot of time
14 in the baby food aisle of Whole Foods and
15 other stores, and I'm just going to read you
16 some ingredients that are in this certified
17 organic baby food.

18 Glucose syrup solids, not organic,
19 modified starch, not organic, mannitol, which
20 is a sugar alcohol, sodium ascorbate, not on
21 the national list, sodium polyphosphate, also
22 not on the national list, and then the non-

1 organic sunflower oil.

2 These ingredients made it into the
3 baby food as part of Life's DHA, marketed by
4 Martek Biosciences, and they make a DHA-rich
5 oil.

6 And our research indicates that
7 the algal oil marketed by Martek is the same
8 genetically modified algal oil that was
9 developed by Monsanto and has never before
10 been part of the human diet.

11 Martek also makes a different kind
12 of DHA which is hexane extracted. Hexane is
13 specifically prohibited in the organic
14 standards, and that kind of oil, mix it into
15 organic infant formula.

16 The USDA has already publicly
17 concurred with our conclusion that these
18 materials are being used inappropriately.
19 The FDA as well has clarified that they do
20 not fall under their fortification policy
21 because they are not essential nutrients.

22 It is therefore shocking that the

1 USDA is continuing to look the other way in
2 the supposed age of enforcement while a
3 handful of corporate food processors add
4 these oils, genetically modified, novel to
5 the human diet, hexane extracted and with
6 synthetic ingredients to their organic
7 products.

8 Infant formula corporations have
9 ignored their legal responsibility for
10 conducting post-market surveillance.

11 We found this out through a FOIA
12 request with the FDA and we also have reports
13 from parents that babies get gastrointestinal
14 reactions to these oils that disappear when
15 they're put on formula without these oils.

16 But most importantly, they have
17 never been reviewed and approved by the NOSB,
18 which the law requires. So they shouldn't be
19 in organic foods.

20 We have filed numerous complaints.
21 Our last complaint is specifically against
22 this baby food, and we request immediate

1 enforcement action to take out these oils,
2 out of any food that is labeled organic.

3 Or if a company wants to still
4 make the food, fine, but don't put the label
5 on it because organic food should provide a
6 safe haven from novel ingredients like these.

7 I also want to talk about
8 enforcement action in the egg industry.
9 There are a handful of producers that provide
10 no outdoor access to organic birds.

11 And it is clearly stated in the
12 current rule that animals cannot be
13 continually confined indoors.

14 A little door with a little, even
15 some have a ramp that goes from the second
16 story where there's hundreds of thousands of
17 birds confined, with a little ramp going to a
18 little outdoor area.

19 That does not constitute outdoor
20 access and we request enforcement action as
21 well.

22 On a different issue, if a

1 company's products do not qualify for the use
2 of the organic label, they shouldn't be
3 allowed to circumvent the rule by making the
4 word "organic" part of their brand name.

5 Currently there are products on
6 store shelves that are not certified organic
7 but the company has decided to make "organic"
8 part of its name.

9 So Organic Bistro is an example,
10 Newman's Own Organics is an example. They
11 cannot use the word "organic" and yet they
12 are. It's right there on the package because
13 it's their name. So we urge you to take
14 action on that issue as well.

15 And then last, we urge you, the
16 USDA, to stand up strong for the organic
17 regulations, specifically with the FDA and
18 the Salmonella rule.

19 We have done a comprehensive
20 search of the scientific literature on this
21 issue and we've come to the following
22 conclusions. And this is all based on

1 science, peer review studies.

2 In Europe, prevalent studies
3 repeatedly and unequivocally show that
4 Salmonella rates are lower on farms with
5 outdoor runs than on confinement farms.

6 Moreover, studies show that risk
7 factors for Salmonella include, and here's a
8 list, cages, large flock sizes, forced
9 molting.

10 Yet, instead of addressing these
11 risk factors in the FDA rule to improve food
12 safety specifically for Salmonella, the FDA
13 has already intimidated a number of organic
14 farmers that we've heard from telling them
15 that outdoor access is a violation of the
16 Food Safety Rule.

17 There's no basis in science for
18 that and especially there's nothing in the
19 FDA rule about wild birds being a risk
20 factor. And this is also in the compilation
21 of research that that can also be
22 scientifically backed.

1 Mice and flies are the problem,
2 not wild birds. We'd be happy to share that
3 document with you and we urge you to continue
4 to stand up strong for the organic standards
5 and for farmers complying with the organic
6 standards. Thank you.

7 MR. LIPSON: Just if you would in
8 the written comment to the email for the
9 listening session, provide those references
10 that would be very, very helpful.

11 MS. VALLAEYS: Great, okay.

12 MR. LIPSON: Appreciate that.

13 MS. VALLAEYS: Yes, thank you.

14 MR. LIPSON: Thank you. Next up
15 would be Laura Batcha and George Bass, unless
16 Angela has shown up. Is Angela Owen here?

17 MS. BATCHA: Thanks, Mark. I'm
18 Laura Batcha, and I'm Vice President of the
19 Organic Trade Association, and you've heard
20 from a number of our board of directors
21 already today.

22 OTA represents about 6,500

1 certified operations across North America. I
2 also serve on the AC21 and the APAC
3 Committee, and I live on an organic farm in
4 southern Vermont.

5 I say I live on the farm because I
6 no longer can say I'm a farmer because I'm
7 mostly in Washington, and so I have to give
8 due deference to my husband who does all the
9 work, so I live on the farm thankfully.

10 I want to thank you again for
11 scheduling the stakeholder listening session
12 at a time when so many folks are in town to
13 be able to provide direct comment to you.

14 I'm just going to focus on two
15 issues related to information technology and
16 data initiatives that I think can serve as
17 building blocks for an investment in the
18 future of the organic sector going into the
19 21st century, and could be important in terms
20 of meeting the strategic goal of increasing
21 certified operations by 25 percent.

22 The 2008 Farm Bill required that

1 the Department of Agriculture develop surveys
2 and report statistical analysis on
3 organically produced agricultural products
4 through the organic product market data
5 initiatives.

6 In carrying out the provision the
7 National Agricultural Statistic Service in
8 2008, conducted the first ever Organic
9 Production Survey as a follow on to the 2007
10 Census of Agriculture.

11 The OPS provided the first
12 comprehensive snapshot of the organic sector
13 in the United States and provided a reliable
14 source of public information critical to
15 farmers and handlers in making informed
16 decisions about their operations, as well to
17 policymakers in analyzing the economic
18 benefits, challenges and trends of organic
19 culture, but also helped legitimize organic
20 culture as an important part of a diverse
21 American agricultural landscape.

22 The OPS is arguably in our opinion

1 one of the most important work products to
2 come out of the support for organic
3 agriculture in the 2008 Farm Bill. We can't
4 thank you enough for all the good work in REE
5 on that.

6 We believe it's imperative that
7 USDA establish the OPS as a regular follow-on
8 to the Census of Agriculture every five
9 years.

10 We've discussed the need to
11 continue OPS with NAS directly, and the
12 agency has indicated that it would need funds
13 in the fiscal 2013 and 2014 budgets to
14 conduct the study, following the next
15 upcoming agriculture census.

16 We request that this priority be
17 reflected in the administration's 2013 budget
18 request to Congress. We think it's very
19 important that these basic data aggregations
20 keep up with the Census of Agriculture in
21 order to track the movement of organic
22 agriculture, but also to inform investment

1 and development in the sector. It's very
2 critical.

3 I'd also like to highlight what we
4 consider to be considerable needs for
5 investment in information technology systems
6 at the National Organic Program.

7 The limitations of the NOP
8 database of certified operations are fairly
9 well understood, but a more robust database
10 of certified operations alone will not meet
11 the technology requirement to keep the U.S.
12 program, U.S. producers and U.S. handlers
13 competitive into the future.

14 Certified operations of all size
15 will be hampered going forward unless
16 antiquated technologies are replaced by new,
17 dynamic, real-time technologies.

18 For smaller operators we often
19 hear of the burden of increased paperwork and
20 certification costs, and at the same time
21 with the global program, the sector's
22 cognizant of the challenges of global

1 oversight and the burden that places on the
2 program's limited personnel resources.

3 Information technology can and
4 should be a solution to both those problems
5 on both ends of the issue.

6 Kelly Shea, in her discussion and
7 follow-up questions from Miles McEvoy, talked
8 about the flow of information broadly in
9 terms of clarifications out to the community.

10 Leslie Zuck touched on the
11 training needs in her testimony as well. All
12 of those issues with a growing industry are
13 just going to get worse and worse if we rely
14 on human one-off communications and
15 technologies.

16 A robust upgrade of technology at
17 NOP is going to be critical to keeping up
18 with the growth of the sector. It's already
19 outdated, and if we look at double digit
20 growth over the next ten years it's just
21 going to get completely unfeasible to keep up
22 without an investment in technology.

1 The Indian organic program, APEDA,
2 has developed an integrated information
3 technology package that's based on their
4 TraceNet system.

5 It connects farms via GPS
6 locations, yield estimates to export
7 documents, transaction certificates,
8 inspection reports, all in one real-time
9 database accessible to certifiers,
10 accreditors, compliance officers and
11 certified operations.

12 The European Union has a database
13 system in place for verifying commercial
14 availability of seed that's comprehensive,
15 localized and mandatory for use.

16 The USDA's National Organic
17 Program is the gold standard in the world.
18 We lead in terms of our unique implementation
19 of the public/private partnership and our
20 mechanisms for oversight enforcement.

21 But USDA Organic as a standard
22 cannot maintain its competitiveness globally

1 if we're being out-innovated by the Europeans
2 and the Indians.

3 If USDA Organic is not competitive
4 globally, U.S. organic producers and handlers
5 cannot be competitive globally. In the U.S.
6 market, the continued health of the sector
7 relies on the trust in the organic seal.

8 Implementing smart technologies is
9 the single most important capital investment
10 that will position the program to be able to
11 grow alongside the sector providing domestic
12 and international oversight, transparency and
13 streamlining of systems, data and information
14 flows.

15 And to that end, OTA's committed
16 to advocating for the resources necessary to
17 help fund this capital upgrade and position
18 the sector for growth into the 21st century.

19 The last thing I want to touch on
20 is in the aftermath of Hurricane Irene. And
21 I just wanted, it's outside of this specific
22 organic discussion area, but I want to thank

1 the Department for their responsiveness in
2 terms of disaster relief.

3 Our farm in Vermont did not suffer
4 major loss, but many of our organic neighbors
5 lost as much as 75 percent of their crops due
6 to flood waters.

7 But even the largest organic mixed
8 vegetable truck farms in Vermont don't carry
9 crop insurance. Congressman Welch from
10 Vermont has introduced has introduced a bill
11 to waive the crop insurance requirement to
12 qualify for disaster relief, but it involves
13 a commitment on the producer's part to carry
14 insurance within the next 12 months.

15 The situation in Vermont puts a
16 spotlight on the work that still needs to be
17 done to get crop insurance programs to work
18 for organic farmers.

19 There's a real need for insurance
20 products that work for small and medium sized
21 farms that sometimes grow as many as 30 or 40
22 different specialty crops on one farm, as

1 well as for diversified farms with integrated
2 crop and livestock systems and farms with
3 longer crop rotations.

4 And so we also note that there's
5 still additional work to be done in terms of
6 the price selection and premium disparities
7 for organic crops.

8 I do want to thank Sharon for
9 announcing relief coming on avocados, so that
10 was good news to hear today. So there's work
11 to be done still on the crop insurance
12 though. And then lastly, I just want to give
13 kudos to NRCS on the implementation of the
14 High Tunnel program through EQIP, very
15 popular with organic farmers.

16 And everybody in my neighborhood
17 has one. It's all the rage. It extends the
18 season, really, really popular.

19 But I think what we need to start
20 doing is looking at what the next program is
21 concretely through EQIP that can help fuel
22 transition of farms to organic. Thank you.

1 MR. LIPSON: Any questions?

2 Thanks, Laura. Mr. Bass? Is George Bass
3 here?

4 MR. BASS: My name is George Bass.
5 Thank you very much for all the years of work
6 of the USDA and the NOP and NOSB, and working
7 together with the producers and the
8 consumers.

9 Thank you for letting me talk
10 about our company, The Country Hen. If we
11 put our hens on the ground we will have to
12 close our business.

13 In 2002, we were allowed to have
14 porches and we continue to have porches under
15 the rule. The first director of NOP thought
16 the porches was a good compromise, so hens
17 would be outside but not on the ground.

18 We have four different problems
19 about having the hens on the ground. Number
20 one, we have many neighbors living close to
21 us within 800 feet.

22 Number two, we don't have the

1 space. All the farm has 17 acres, and
2 63,000. We believe the maximum on the ground
3 is 100 hens, one acre. Therefore we should
4 have 630 acres for all the hens.

5 Number three, if we put all the
6 hens on the ground, a lot of the manure would
7 go to a small brook then a river and then to
8 a huge reservoir. The water goes to Boston,
9 65 miles to the east.

10 The most important, number four is
11 the big point, is diseases, cannibalism,
12 suffocating, owls and dogs and other problems
13 of free range.

14 The mortality is much higher in
15 Europe. They have had free range for many
16 years. Holland has two studies of outdoor
17 hens. One flock has a 14.3 mortality, the
18 other flock has 11.4.

19 Denmark has a study that shows
20 free range is 20.8 of average. Our company
21 has an average of 4.8 of this year. Now
22 therefore of us, we found the top expert

1 scientist who will give us a very important
2 white paper of disease of free range hens.

3 Finally, if we cannot put our hens
4 on our porches as outdoors access, we could
5 not produce organic eggs. We would have to
6 close our doors and stop our business. The
7 compromise of the porches could be made
8 again.

9 That's it.

10 MR. LIPSON: George, could you
11 just say where your farm is?

12 MR. BASS: We're in Massachusetts.

13 MR. LIPSON: Thank you.

14 MR. BASS: It's the only one
15 that's fairly large. It's a small one.
16 Actually the big ones in the United States,
17 there's 28 million hens. That was a pretty
18 big business. We're a very small operation.

19 MS. GREENE: You mentioned several
20 references.

21 MR. LIPSON: Is that right? If
22 you could put the references in your written

1 comments.

2 MR. BASS: Did you say the paper?

3 I'm sorry, I had a stroke and some of the
4 times I'm not very good at --

5 MR. LIPSON: The scientific
6 references, the papers that you're referring
7 to.

8 MR. BASS: I could give you some.

9 MR. LIPSON: Yes, we would like to
10 have those references.

11 MR. BASS: I'd like to do that.
12 Well, thank you.

13 MR. LIPSON: Thanks. All right,
14 did Angela arrive? Apparently not. Anybody
15 else who would like to give testimony,
16 comments this morning before we break for
17 lunch?

18 That's our last registered
19 commenters for the morning. We do have a
20 full set of commenters registered for the
21 afternoon beginning at 12:45.

22 So unless anybody else had

1 anything else to offer we'll adjourn until
2 12:45. Thanks very much.

3 (Whereupon, the foregoing matter
4 went off the record at 11:30 a.m.
5 and resumed at 12:48 p.m.)
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A-F-T-E-R-N-O-O-N S-E-S-S-I-O-N

12:48 p.m.

MR. LIPSON: Welcome back to the afternoon session of our public listening session on USDA priorities and activities related to organic production and marketing.

We had a great morning session, got some great comments from members of the public.

And I'll just reiterate that we're soliciting these comments in order to help the Department shape its priorities and focus on the performance goal in the USDA strategic plan, which directs the agencies to work towards an increase in the number of U.S. certified organic businesses by 25 percent over the period from 2009 to 2015.

So we're trying to plan for our activities and figure out what's the most important thing for us to be working on in order to achieve that goal.

We have a very distinguished

1 listening panel of senior USDA officials who
2 will be receiving your comments.

3 And anchoring this panel is
4 Undersecretary Ed Avalos, and we'll hear just
5 a couple of welcome remarks from Ed and then
6 the rest of the panel will introduce
7 themselves, and we'll start with the comments
8 right around 1 o'clock.

9 So Mr. Undersecretary, please.

10 UNDERSECRETARY AVALOS: Mark,
11 thank you very much, and good afternoon. How
12 is everybody?

13 PARTICIPANTS: Great.

14 UNDERSECRETARY AVALOS: Where's
15 the rest of the crew?

16 PARTICIPANT: Still at lunch.

17 UNDERSECRETARY AVALOS: Should we
18 wait a little bit, Miles?

19 MR. MCEVOY: I think they'll be
20 trickling in. We probably should stay on
21 time. We've got the schedule of comments.

22 UNDERSECRETARY AVALOS: Okay, very

1 good. Anyway welcome, welcome to USDA. And
2 I just wanted to emphasize to the folks, our
3 stakeholders coming in to present comments,
4 thank you very much.

5 That's really important, not only
6 to me and to the crew at AMS Organic Program,
7 but it's very important to the Secretary.
8 And so thank you for taking time from your
9 busy schedule to come in and present
10 comments.

11 I am the Undersecretary for
12 Marketing and Regulatory Programs. I oversee
13 APHIS, Animal Plant Health Inspection
14 Service, AMS, the Agricultural Marketing
15 Service, and GIPSA, which is Grain Inspection
16 Packers and Stockyards Administration.

17 And I just wanted to acknowledge
18 the hard work of some of our people at AMS
19 working on the NOP program starting with
20 Acting Administrator, Dave Shipman, and of
21 course Miles McEvoy.

22 Am I saying your name right? I

1 just know him as Miles, and he's a baseball
2 fan. But anyway, Mr. McEvoy and his staff
3 have really done a great job.

4 As organic stakeholders you should
5 be proud of the work these people are doing
6 for you. I also wanted to recognize another
7 individual that's also within my mission
8 area.

9 We have Mr. Mark Lipson, who
10 serves as the Organic Policy Advisor. I
11 didn't know your title, Mark.

12 But anyway, his work is really
13 important because he works across agencies,
14 and works to address organic issues with
15 input for different agencies and different
16 programs within the other agencies.

17 Also, the Organic Standards Board
18 provides input and advice to our NOP program
19 at USDA. However, again I emphasize how
20 important your input and your suggestions are
21 today, because you go beyond the
22 responsibilities of the board.

1 I'm hoping that we'll get some
2 comments on other issues such as enforcement
3 and communications. And I just wanted to
4 keep saying and I want to stress how
5 important this is to us.

6 I just wanted to let you know that
7 at USDA just like other federal agencies are
8 facing some budget cuts. There's no getting
9 away from it. It's going to happen.

10 And that makes your input even
11 more important because we are looking to, I
12 don't want to say prioritize, but we're
13 looking to restructure how we do business
14 because we have to.

15 You know, we have a lot of
16 programs that are very good programs. But
17 when they cut your money, and you say yes,
18 this is a great program, I'd like to keep it,
19 but if you don't have money you can't do it.

20 So that's why I want to say
21 prioritizing and restructuring, but your
22 inputs are very important. Very important

1 just to make sure that we're meeting the
2 needs of the organic stakeholders.

3 So anyway, I was going to tell a
4 story but I might upset Mark. I was going to
5 tell my organic story but I don't think I
6 will. I'll save that story for next time.

7 But before we get started, I
8 wanted to make sure that our panel would
9 introduce themselves.

10 And after the panel does so any of
11 our other USDA employees that are out in the
12 audience, if you'll stand up and introduce
13 yourself. And then we'll get started with
14 our participants. Thank you very much.

15 (Applause.)

16 MS. HAMM: Good afternoon, my name
17 is Shannon Hamm, and I'm the Associate Deputy
18 Administrator for the Policy and Program
19 Development Division within the Animal Plant
20 Health Inspection Service.

21 And we are happy to be here. I've
22 been part of the Organic Working Group in the

1 Department for quite a few years. I won't
2 say the number of years because then you'll
3 think I'm old.

4 But it's been a really wonderful
5 attribute to have the collaboration across
6 the agencies to really help support and grow
7 the organic program. Thank you.

8 MS. MALVITZ: I'm Julie Malvitz.
9 I am with USDA NRCS, the National Resource
10 Conservation Service. I am the Program
11 Manager for the Organic Initiative.

12 And NRCS is very proud to be a
13 partner with all the organic agencies.

14 MS. WILCOX: I'm Caren Wilcox, and
15 I'm currently working the Research Education
16 and Economics mission area for USDA.

17 In that mission area we have the
18 National Ag Statistics Service, we have the
19 Economic Research Service, the Agricultural
20 Research Service and what we call NIFA, which
21 is the National Institute for Food and
22 Agriculture.

1 Those are the four main areas for
2 USDA science, but we of course have science
3 throughout our whole Department and all the
4 agencies in REE are involved with the Organic
5 Working Group.

6 MS. MCELROY: I'm Marianne McElroy
7 with the Foreign Agricultural Service. I'm
8 the Director of the Processed Products and
9 Technical Regulations Division.

10 Our association with obviously the
11 organics goes back quite awhile. We are also
12 deeply involved with issues associated with
13 the export of U.S. agricultural products
14 overall. Thank you.

15 UNDERSECRETARY AVALOS: Okay, do
16 we have any USDA folks out in the audience?
17 I see Denise back there.

18 Well, very good. I think we've
19 got a pretty good Army here. Okay, I guess
20 our next step is to have our commenters come
21 up.

22 They gave me a list so I'm going

1 to read the top five, so you can get ready at
2 the podium. And I hope the folks are here.

3 I can't pronounce this. I'm just
4 going to say it like I would in Spanish,
5 Ariane Lotti, Susan Pavlin, Karen Wynne, Katy
6 Green and Melissa Hornaday.

7 MS. LOTTI: Great, thank you. And
8 I'm going to look to you for our time.
9 Great, thank you. My name is Ariane Lotti,
10 I'm the Policy Director for the Organic
11 Farming Research Foundation.

12 We are a national farmer-led
13 nonprofit whose mission is to foster the
14 improvement and widespread adoption of
15 organic farming systems.

16 I wanted to bring everybody's
17 attention to the executive summary of a
18 report that the Organic Farming Research
19 Foundation released yesterday, Organic
20 Farming for Health and Prosperity.

21 The report reviews the scientific
22 literature from North America on organic

1 agriculture.

2 And the main findings, the 10,000
3 level foot findings from the report are that
4 organic farming is good for health, for job
5 creation, the economy, soil and water, birds
6 and bees or biodiversity, and for slowing
7 climate change.

8 The report includes a number of
9 policy recommendations. The policy areas
10 are, expanding organic research funding so
11 farmers can be successful, ensuring fair and
12 appropriate risk management tools for organic
13 and transitioning farmers, meeting market
14 demand.

15 While the USDA does have an
16 ambitious goal, we actually calculated that
17 in order to meet the demand in 2015, we're
18 going to need 42,000 farmers, organic farmers
19 here in the U.S., create a robust organic
20 transition assistance program and reward the
21 environmental benefits of organic
22 agriculture.

1 So specifically, the USDA's
2 Organic Working Group can move these policy
3 recommendations along and the detailed
4 recommendations underneath them by providing
5 a number of roles, the first of which is a
6 coordination role.

7 There is both a need for
8 connections between the National Organic
9 Program and other agencies such as the
10 Natural Resources Conservation Service, the
11 Risk Management Agency, to have established
12 connections with the National Organic
13 Program.

14 So that the guidelines that those
15 agencies are putting out conform to National
16 Organic Program regulations and so that the
17 planning requirements and that the documents
18 that farmers use are not duplicative.

19 There's a need for USDA employees
20 and field staff on how organic agriculture
21 works, particularly as the Department serves
22 more and more organic farmers.

1 We've seen this with the
2 implementation of the Organic Initiative at
3 NRCS that USDA field staff just don't have
4 the knowledge yet to be able to serve organic
5 farmers the way they do other sectors of
6 agriculture.

7 I would urge the Working Group to
8 think about transitioning farmers and where
9 we're actually going to get the 42,000
10 certified organic farmers that we need to
11 meet that demand, and providing a coordinated
12 package of technical marketing and financial
13 assistance to transitioning to organic
14 producers.

15 Those are kind of the producers
16 who are currently lost in the system. We
17 don't know how many there are, what they
18 need, and how to help them become certified
19 organic.

20 There's a need for improved data
21 coordination between the data collection
22 agencies such as AMS and the data user

1 agencies such as RMA.

2 I know there's ongoing work in
3 that respect, and I would just encourage the
4 continued work that's being done in order to
5 produce useful information to be able then to
6 create crop insurance products that are
7 appropriate for organic farmers.

8 There's a need also for
9 coordination among the REE mission area and
10 the National Organic Program and other
11 program delivery agencies at USDA so that our
12 policy decisions are based on the research in
13 organic systems and the research findings.

14 A couple of other specific
15 recommendations, I've got one minute left. I
16 would just say improvements to crop
17 insurance.

18 I would say let's eliminate the
19 five percent surcharge on the premium, let's
20 publish more price elections beyond the four
21 that we've got so far, and let's help create
22 appropriate risk management options for

1 diversified operations.

2 We also need the establishment of
3 a regular follow-on Organic Production Survey
4 to the Census of Agriculture modeled after
5 the very successful 2008 Organic Production
6 Survey.

7 I just want to state my opposition
8 and our opposition to the USDA continued
9 deregulation without conditions of
10 genetically modified organisms and crops, and
11 the need for appropriate contamination
12 prevention measures and compensation measures
13 for organic and non-GE farmers.

14 And with respect to time I'll just
15 stop here. Thanks so much.

16 UNDERSECRETARY AVALOS: Ms. Lotti,
17 thank you very much. And I just noticed the
18 instructions. I didn't give all the
19 instructions out.

20 Is this the non-deck section over
21 here for the, and a non-deck on this side
22 also, okay. And then also there's a five-

1 minute limit and they'll prompt you over
2 here.

3 Did I get everything now, Mark?
4 Okay. So our next presenter, Susan Pavlin?
5 Thank you.

6 MS. PAVLIN: Good afternoon. I am
7 Susan Pavlin and I am from Georgia. Georgia
8 is a state with I guess a small amount of
9 organics in some respects, but a lot of
10 potential.

11 Agriculture is our number one
12 industry, and for the first time in 40 years,
13 more than 40 years, we have a new
14 agricultural commissioner in the state which
15 is giving us a lot of opportunity to expand
16 and open our directions a bit.

17 I, myself, am a new small farmer,
18 and one of the jobs that I do with an
19 organization called Global Growers, in
20 Georgia, is organize and support new farmers,
21 particularly minority farmers and immigrant
22 farmers that are coming into our state or

1 already are in our state and are looking for
2 agricultural opportunities, often because
3 it's connected to what they did at home.

4 I'm also often looking for land
5 and land opportunities for these farmers,
6 which means transitioning traditional
7 agricultural land into organics whenever
8 possible.

9 What we know on the ground in
10 Georgia that are three greatest barriers to
11 working in organics are data, not having
12 enough of it to convince both our lawmakers
13 and even our producers that it's a good idea
14 and that it has ramifications, economic
15 benefits for them that would be helpful.

16 The cost of getting certified and
17 maintaining certification, and then also the
18 technical skills, because we do not have a
19 state that has a lot, we have very long
20 tradition of agriculture but not a lot of
21 exposure to organics. That's a serious
22 limitation.

1 So I'm coming to you to say that
2 from the policy level on the data, the more
3 that we can integrate the data collection on
4 organics into the traditional data collection
5 and mainstream that it would be extremely
6 helpful to have the kind of information that
7 is out there for the rest of the agricultural
8 industry.

9 On cost, it's incredibly important
10 to both maintain the cost share program and
11 then also to look at the crop insurance, the
12 reduction of the fees.

13 I know that my organization is a
14 recipient this new year coming up to risk
15 management, education and outreach funds in
16 order to help our producers connect to crop
17 insurance and other benefits like that.

18 And it's very hard sell to tell
19 them, look, there's this opportunity to get
20 involved and get your crop insurance but you
21 have to pay more if you become organic. And
22 that's a problem for us.

1 And then of course the technical
2 skills. There's the technical skills of
3 being out in the field, how to maintain the
4 paperwork, all of those things, but there's
5 also the marketing that's particularly
6 important in a state like Georgia that is
7 trying to build its local economy and is
8 trying to connect producers to more wholesale
9 opportunities within the organics field.
10 That's a very new place for our state so
11 that's particularly important.

12 And then lastly I would say that
13 point that was raised before about training
14 of USDA staff locally, and then ultimately
15 research and reaching down through to the
16 extension service, there's very few people
17 working for the USDA and the extension
18 services in Georgia who seem to have an on-
19 the-ground familiarity of what organics is
20 about.

21 And that would be of tremendous
22 help to those of us who are trying to access

1 those resources and those services, for them
2 to have a bit more working knowledge of what
3 we're trying to do. Thank you.

4 UNDERSECRETARY AVALOS: Thank you
5 very much. Okay, Karen Wynne.

6 I'm going to go ahead and get more
7 names on deck, Jim Pierce, John Mesko and
8 Beth Larabee.

9 MS. WYNNE: Hi, my name's Karen
10 Wynne. I work with the Alabama Sustainable
11 Agriculture Network. I'm glad to have
12 followed Georgia so we can be a little
13 southeastern block.

14 I also work as a soil scientist.
15 I'm a technical service provider so I do a
16 lot of organic farm planning with the Organic
17 Initiative.

18 I have a small organic, exempt
19 organic farm in north Alabama. I've done the
20 organic inspections. I've been doing this
21 kind of work for the past couple decades.

22 I'm not from Alabama, if you

1 couldn't tell. And I had a small farm in
2 upstate New York that was certified organic,
3 and when I moved down to Alabama I was really
4 surprised by the completely different set of
5 challenges to farming organically in the
6 Southeast.

7 And it's things like the climate
8 in the Southeast is hot, humid. We don't
9 have great soils. So just, you know, as far
10 as organic production it's not easy to start.

11 But then, you know, we have a lot
12 of infrastructure challenges, and I think
13 that has a lot to do with the historical
14 nature of agriculture in the South, you know,
15 with plantation agriculture and share
16 cropping.

17 Not a lot of small entrepreneurial
18 farmers trying out new things, so I found
19 that the challenges are pretty different than
20 in a lot of other parts of the country.

21 But I do work with a lot of
22 farmers. I'm doing farm planning in Alabama,

1 Tennessee, Arkansas and Florida. And so it's
2 been really interesting to see what
3 everyone's doing, and it's just a really
4 diverse range of organic farming products and
5 practices that they're using.

6 I have to say that there was not
7 much support from the agricultural
8 establishment in Alabama until very recently,
9 so people would get calls, would call their
10 extension agent and be told, oh, you can't do
11 that in Alabama, which probably discouraged
12 more of them than might have otherwise.

13 But recently there's been
14 increased interest. The funding has made a
15 huge difference.

16 We just have a lot of farmers that
17 were thinking about it and are actually
18 giving it a try now, and I'm hoping that we
19 can access markets to make it actually, you
20 know, a success for them.

21 But I guess generally I just want
22 to say that I really believe that organic

1 production practices are valuable for all
2 farmers not just for, you know, this organic
3 farming niche.

4 So I'm excited to see cover
5 cropping and, you know, crop rotation and
6 just basic soil building practices. And I'd
7 like to see that encouraged in all the
8 sectors of the USDA because it just makes
9 sense to me.

10 And I think as we have more
11 extreme climate, you know, events, it's going
12 to become a bigger issue. And so I just, I
13 guess that's my, I can't make a distinction
14 between organic agriculture and agriculture.
15 I just don't think there is one so much.

16 And I'd really love to see more
17 systems research. I think that we can't, you
18 know, do the scientific method, you know,
19 just one variable at a time and get very
20 useful results in a reasonable period of
21 time. So thank you.

22 UNDERSECRETARY AVALOS: Thank you

1 very much. Okay, next we have Katy Green.

2 MS. GREEN: Hi there. My name is
3 Katy Green, and I am from the Maine Organic
4 Farmers and Gardeners Association, or MOFGA.

5 And for those of you who aren't
6 familiar with MOFGA, we're the largest and
7 oldest state organic agency in the country.
8 We have about 6,500 members, and we also have
9 a wholly-owned subsidiary which is MOFGA
10 Certification Services, which is the primary
11 USDA accredited certifying agency for the
12 state of Maine. And we certify just under
13 400 farms. We're hoping to get to 400 next
14 year.

15 So my role at MOFGA is, I'm the
16 Organic Transitions Coordinator, so I help
17 people who are trying to transition to
18 organic production get through the hurdles.

19 And I'm also a technical service
20 provider for the new conservation plan
21 supporting organic transition, which is an
22 Activity Plan through NRCS.

1 And I just wanted to comment on
2 some programs that are really valuable to our
3 growers in their transition to become
4 certified organic.

5 And one that I just mentioned is
6 the new Organic Initiative through NRCS. We
7 found that our growers really jumped at the
8 opportunity to participate in that program,
9 and we've had, just since the Activity Plan
10 has been in existence, we've had or I've
11 written 14 and completed them, and of those
12 14, 11 of those growers have already become
13 certified.

14 A lot of them didn't have major
15 changes to make in their production, they
16 just needed a little help to get over the
17 hurdles. And that's an example of a program
18 that's working really well. It's really low
19 cost and it really helps, especially
20 beginning farmers.

21 The Organic Initiative, like I
22 said, our growers were really excited to

1 participate in that NRCS program. And
2 because I have a good working relationship
3 with NRCS in our state, we had a really high
4 sign-up numbers which we're really proud of.

5 But I did get a lot of phone calls
6 from people in other states that they, that
7 NRCS staff just didn't have the knowledge
8 that they needed to really unroll that
9 program, and they really weren't familiar
10 with organic agriculture.

11 In our state we were lucky because
12 we were able to coordinate a training with
13 NRCS staff, but more training on organic
14 agriculture for NRCS staff is absolutely
15 essential.

16 I'd also like to touch on the
17 beginning farmer programs. We have a robust
18 beginning farmer program at MOFGA and we
19 provide advanced training to about 25 people
20 a year who then go on and start their own
21 farm businesses, and we have about a 90
22 percent success rate.

1 And we really couldn't do this
2 without support from the beginning farmer
3 program at USDA.

4 We think that, you know, growing,
5 going more organic farms looking towards
6 beginning farmers is absolutely essential.
7 They are overwhelmingly choosing to go
8 organic, at least in our state.

9 And then finally, the
10 certification cost share program is also a
11 program that's really essential to our
12 growers.

13 We would lose a lot of the 400
14 farms that I mentioned from being certified
15 organic if they no longer had access to the
16 cost share program.

17 Our numbers would dip
18 significantly I suspect. So that program is
19 incredibly valuable and really essential to
20 our growers.

21 And if I could just share, I have
22 one minute. I'll make it a quick story.

1 Just about two weeks ago I met with someone
2 on a technical services visit because I was
3 her technical service provider for NRCS.

4 And she had called me the day
5 before our visit and she was concerned that
6 she might not even continue farming.
7 Hurricane Irene had totally devastated her
8 and she didn't know what to do.

9 And after our visit, I told her
10 about the programs that were available to her
11 specifically through NRCS and that when she
12 became certified the cost share could really
13 help defray some of those costs.

14 And she was totally reinvigorated,
15 and by the time I got back home she had
16 already emailed me and said, thank you so
17 much. I had no idea all those resources were
18 available to me.

19 So those are the kinds of things,
20 you know, she's going to go on and get
21 certified, you know, within the next couple
22 of years. And those are the types of people

1 that these programs are really helping.

2 Thank you so much.

3 Oh, and I don't know if I can hand
4 stuff out to you, but we have a new report,
5 Maine's organic farms and impact report, and
6 it shows you that in just the state of Maine
7 alone organic farms create \$91 million to the
8 local economy. Thank you.

9 UNDERSECRETARY AVALOS: Well, she
10 gave you the stop sign, didn't she?

11 MS. GREEN: I'm sorry.

12 UNDERSECRETARY AVALOS: Thank you
13 very much. I'm going to have to excuse
14 myself, and I apologize to our visitors that
15 I can't stay for the whole session, but
16 they're calling me out.

17 So Mark, do I turn it over to you?

18 MR. LIPSON: Yes.

19 UNDERSECRETARY AVALOS: Okay,
20 thank you very much. And the next speaker is
21 Melissa Hornaday.

22 MR. LIPSON: Is Melissa here?

1 Then Mr. Pierce?

2 MR. PIERCE: Let's see how this
3 goes, reading from a computer. Thank you.
4 For the record, I'm Jim Pierce, Global
5 Organic Program Manager for Oregon Tilth
6 Certified Organic, the best certifier.

7 Oregon Tilth's been a
8 certification body since 1989, since the
9 National Organic Program, since before the
10 program was even a glimmer in Washington's
11 eye.

12 Thank you for the opportunity to
13 help you establish priorities. You've heard
14 many, I will mention three, communication,
15 harmonization and cross-pollination.

16 Your first priority should be to
17 keep doing what works, and what's working is
18 improved communications. As a card-carrying
19 lumper I have been involved in the organic
20 movement long enough to have realized this
21 long ago.

22 If you ask anybody working in this

1 movement, the classic Studs Terkel question,
2 what do you do, you can take the answers
3 which will often be exaggerated or extended,
4 passionate, evangelical even, and can be
5 lumped into, cleanly into one of two
6 categories.

7 All will effectually say either, I
8 produce food or they'll say, I communicate.
9 Mr. Bass and Uncle Leslie this morning are in
10 the former, food producers. You all and I,
11 we're in the latter. We communicate.

12 The regional accreditation
13 managers system has noticeably alleviated
14 rogue decisions among certification. The
15 improved NOP website, the NOP newsletter, the
16 NOP handbook, the NOP insider listserv have
17 significantly improved the delivery of your
18 message. Good work, thank you.

19 But communication is like sex.
20 It's all good or should be, but it can always
21 be better. Continue your commitment to
22 transparency where the consumer and farmer

1 get the same five minutes as the multi-
2 national CEO.

3 Continue to engage with
4 constituent working groups like the
5 Accredited Certifiers Association. Continue
6 your good work as international liaisons in
7 negotiating recognition agreements in the
8 spirit of harmonization and equivalency while
9 respecting regional, cultural and geographic
10 diversity.

11 Perhaps you know this, but I'll
12 state it for the record. It's more
13 appropriate to negotiate international trade
14 at the diplomatic level rather than the NOSB
15 and the certifier stakeholder level because
16 the tasks require different skill sets.

17 You all are more big picture,
18 pragmatic, eyes on the prize, whereas versus
19 analytical detail oriented. It's the latter,
20 the everything except that got us in good
21 faith, into the partial U.S./Canada
22 Equivalency arrangement, which included some

1 carve outs.

2 An arrangement which, ground
3 breaking, welcome and wonderful as it is, has
4 caused a reverse domino effect all the way up
5 the supply chain to each and every farm.

6 The European Union and Canada have
7 managed to negotiate a no-holds-barred,
8 bilateral equivalency agreement. Please keep
9 the same goal at the highest priority.

10 One more concern priority before
11 ending on kudos. The priority is to balance
12 the stasis as repeatedly stated by Mr.
13 McEvoy, of strict and fair.

14 At OTCO we are watching and
15 concerned about the trend towards more
16 rigorous, prescriptive and costly regulation.

17 It would appear that the pasture
18 regulation has added a minimum, a minimum for
19 the best dairy farmers of about 30 percent to
20 their annual costs of certification.

21 Residue testing, inspector
22 licensing, verification to international

1 trade agreements will add more. And while
2 this is good for consistency and integrity,
3 it could be a barrier especially for small
4 and mid-size producers.

5 Your last priority is another keep
6 doing this mandate. Keep cross-pollinating
7 the National Organic Program throughout the
8 USDA. Clearly a two-way win-win as the NOP
9 bolsters its identity while at the same time
10 exposing the conventional food system to
11 better practices.

12 In particular, closing kudos comes
13 from OTCO's Executive Director, Chris
14 Schreiner, as he wrote, "Jim, it would be
15 great to incorporate into your public
16 comments a nod to Oregon Tilth's partnership
17 with NRCS on delivering technical training
18 and support to NRCS field staff about organic
19 production systems. This is a partnership
20 supporting the entire organic ag community
21 that I want more people to hear about."

22 Mark Rose, who was here earlier,

1 EQIP Program Manager, works out of national
2 headquarters for NRCS. We just finalized an
3 amendment to our contribution agreement with
4 NRCS on the subject, extending the
5 performance period for another two years from
6 September 2012 to 2014.

7 This required NRCS commitment of
8 an additional \$125,000, with matching
9 commitment from Oregon Tilth.

10 I wouldn't get into these details
11 with the public, but wanted to give you
12 background in case you crossed paths with Mr.
13 Mark Rose and have a chance to thank him for
14 NRCS support.

15 Thank you for hosting this
16 inaugural listening session and for hearing
17 our comments. Thank you.

18 MR. LIPSON: Thanks, Jim. Any
19 questions on the panel?

20 Jim, could you just say a little
21 bit more about how the contribution agreement
22 with NRCS is working for Oregon Tilth? Is

1 there a way to make that process more
2 conducive for other cooperators?

3 MR. PIERCE: It has worked beyond
4 our expected success, anticipated success.
5 It's a shared program between NRCS and Oregon
6 Tilth.

7 Sarah Brown is our NRCS educator,
8 and she has been presenting, traveling,
9 participating in workshops all around the
10 country with NRCS people.

11 A lot of it on grazing, but really
12 a diverse set of subjects which, you know,
13 Chris sent along and I didn't get into that
14 level of detail.

15 But where we were a bit
16 apprehensive at committing the money and not
17 knowing just what to expect, we have been
18 satisfied beyond our expectations in its
19 success. It really has worked well.

20 It's an education element that is
21 being hungrily asked for by the field staff,
22 and we're glad to help provide it. Okay,

1 thank you.

2 MR. LIPSON: Okay, thanks. Okay,
3 our next sequence is John Mesko, Beth
4 Larabee, Lindsey Shute and Karri Stroh.

5 MR. MESKO: Thank you. My name is
6 John Mesko. I'm the Executive Director of
7 the Sustainable Farming Association of
8 Minnesota. We represent over a 1,000
9 farmers. Many of them certified and
10 noncertified organic farmers.

11 I am also an organic farmer
12 raising organic beef and lamb and marketing
13 direct to consumers in the Twin Cities.

14 Specifically I'm here in
15 opposition to deregulation of genetically
16 modified crops, and I would express a need
17 for a regulatory framework that protects
18 organic and nongenetically engineered farmers
19 from contamination and compensates them for
20 when contamination occurs.

21 And to frame that for you I'd like
22 to share two personal stories with you.

1 Prior to farming, I worked for 20 years in
2 the, what we would call the conventional ag
3 industry. I had a very good job at a very
4 good salary with a leading biotech firm.

5 And one of the roles I had there
6 was to track and identify and solve the
7 problem of competitor genetically modified
8 organisms getting into our seed crop.

9 I did that and solved or resolved
10 the issue in a number of different ways. And
11 at the same time that was going on in my
12 career, at home our newborn daughter was
13 experiencing some severe food allergies and
14 was very, very sick and we were concerned for
15 her life.

16 The doctor that we took her to
17 immediately recommended that we eat organic
18 food among other things, install a water
19 filter and these types of things, basically
20 telling us that it was her environment that
21 was causing some of these problems.

22 We did that and she has recovered

1 mostly. But at work I had this conflict.
2 Now I was contributing to a food system that
3 actually contributed to my daughter's
4 illness.

5 About that time I was in a meeting
6 with the director of research for the parent
7 company of the organization I worked for.

8 He shared with us all the up and
9 coming technologies and how much they were
10 going to result in share price increases for
11 our organization, our shareholders.

12 And the one thing he was really
13 excited about was an anti-sperm gene that had
14 been developed by our organization and was
15 going to be put into corn for, as he
16 expressed, the purpose of third world
17 population control.

18 At that point I decided that I
19 could no longer, because of my moral
20 opposition to that form of birth control,
21 could no longer give the best years of my
22 career to that organization and I left.

1 And knew that we would have to
2 begin farming and producing organic food,
3 making it available to other people that had
4 children that had problems similar to our
5 daughter's problem.

6 Another personal story I'd like to
7 share with you is that currently our farm in
8 Minnesota is neighbored by a farmer who's
9 been there for over 50 years, a grass based,
10 organic producer.

11 And recently, in fact, in 2011, he
12 for the first time rented out a significant
13 portion of his land across the road from our
14 farm to a conventional producer.

15 And this person -- we're in
16 northeast central Minnesota, about an hour
17 north of the Twin Cities. This farmer is
18 from southern Minnesota.

19 And this farmer is so big that he
20 has pockets of machinery located in different
21 parts of the state. And he just hires people
22 to go to this area and farm that and goes

1 over here and farms that.

2 And the reason he's able to do
3 this is because of our current ag policy that
4 rewards the production of commodity crops in
5 the ways that it does.

6 So across the road from our house
7 -- thank you. Across the road from our farm
8 is what has been for 50 years a genetically
9 modified free area of grass and pasture, it
10 is now GMO crops.

11 And that threatens our business,
12 and the current ag policy is going to, if it
13 continues is going to create more and more of
14 this widespread situation where farmers
15 leapfrog to wherever they can find a pocket
16 of land where they could rent.

17 If it takes ten farmers to put it
18 together, I want to rent 1,000 acres or 2,000
19 acres in that area and I'm going to bring
20 into that area my farming practices.

21 So again just to quickly
22 reiterate. I'm opposed to the deregulation

1 of genetically modified organisms and crops,
2 and I'm expressing a need for a regulatory
3 framework that compensates farmers for,
4 organic farmers for when contamination
5 occurs. Thank you.

6 MR. LIPSON: Thanks, John. John,
7 I didn't catch what crops you grow. Can you
8 just talk a little bit about your operation?

9 MR. MESKO: Our farm operation is
10 beef. We also raise some pork, a small
11 quantity of pork and lamb. And we're grass
12 based. We don't feed grain to the beef and
13 the lambs so we don't grow those crops. It's
14 all grass and hay pasture.

15 MR. LIPSON: And are you testing
16 feed that you, are you bringing in any feed
17 that you then have --

18 MR. MESKO: We purchase, the only
19 feed we purchase -- well, for the beef and
20 the lamb, no. We have just a handful of pigs
21 and we purchase feed for them.

22 MR. LIPSON: Okay, thanks. Beth

1 Larabee? Is Beth here? How about Lindsey?
2 Karri Stroh?

3 MS. STROH: Good afternoon. I am
4 Karri Stroh. I am the Executive Director for
5 Northern Plains Sustainable Ag Society, and
6 we're based in LaMoure, North Dakota.

7 And North Dakota is ranked eighth
8 in the U.S. for total organic crop land. I'm
9 also an IOIA trained organic inspector, and I
10 have a background in certification decision
11 making for some organic certifying agencies.

12 I also live on an organic small
13 green farm which includes organic vegetable
14 production that we raise for farmers market.

15 Northern Plains is a nonprofit
16 membership organization that provides
17 education, research and some advocacy for our
18 organic agriculture and our members.

19 The largest portion of our
20 membership base is located in North Dakota
21 and South Dakota, but we do have members in
22 five other outlying states.

1 I have a few comments that our
2 growers, when I talked to them that I was
3 coming that they wanted me to express. And I
4 know my time is limited so I'll try to make
5 as many of them as I can.

6 And one of the main comments that
7 they said to us is the need for connection
8 and training between the National Organic
9 Program and other USDA agencies to make sure
10 that assistance and programs that are offered
11 are in compliance with the National Organic
12 Program.

13 They also asked for the support
14 for improvements to the EQIP Organic
15 Initiative including training of field staff,
16 creation of full time organic specialists in
17 regional offices, and outreach to organic and
18 transitioning growers.

19 They asked for improvements to our
20 organic crop insurance including the removing
21 of the five percent surcharge on all crops,
22 the publishing of more organic price

1 elections and the creating of appropriate
2 insurance options for their diversified
3 operations.

4 They are opposed to the USDA's
5 deregulation of genetically modified
6 organisms and crops, and the need for a new
7 regulatory framework that protects their
8 organic farms and other non-GE farmers from
9 contamination.

10 And they're asking for
11 compensation for them when those
12 contaminations occur on their farm.

13 We also encourage the improved
14 coordination between data collection agencies
15 such as the AMS and data user agencies such
16 as the Risk Management Agency.

17 They also wanted me to extend
18 their thank you for some programs that really
19 helped them on their farm. And one was the
20 cost share reimbursement program of the 75
21 percent with the max up to the \$750.

22 This program is very crucial to

1 small and mid-sized farmers as well as those
2 beginning farmers. Because of the sector's
3 lower start up costs and the market
4 opportunities that they face they really
5 appreciate that reimbursement program.

6 And one other program that was
7 highly used by our growers was the NRCS
8 Greenhouse Hoop House extension.

9 And everyone knows that North
10 Dakota, South Dakota, we face some terrible
11 winters, and that allowed them to extend
12 their growing season which then provided some
13 more economic income for their farms.

14 So they were very grateful for
15 those programs. Thank you.

16 MR. LIPSON: Thanks, Karri. Okay,
17 Melissa, Beth, Lindsey, anyone there show up?
18 So let's go with Mr. Maltby, to be followed
19 by Richard Siegel, Steve Etko.

20 MR. MALTBY: Does that mean I can
21 have everybody else's time, Mark? Does that
22 give me ten people's time? Just to keep you

1 on schedule.

2 MR. LIPSON: If you're good.

3 MR. MALTBY: I'm always good. My
4 name is Ed Maltby. I'm the Executive
5 Director of the Northeast Organic Dairy
6 Producers Alliance and coordinator for the
7 Federation of Organic Dairy Farmers,
8 representing organic farmers from across the
9 country.

10 We are one of the few, if not the
11 only, organizations that actually represents
12 producers without any connection to the
13 marketplace.

14 Being able to speak in a room such
15 as this, I went to one of the working groups
16 we had three or four years ago which was in a
17 small conference room, 20 or 30 people were
18 there.

19 And it seems that we've actually
20 come to maturity, and with maturity brings
21 problems and challenges. The age of
22 enforcement we hope is not the age of

1 bureaucracy.

2 While I don't necessarily agree
3 with, wonderful certifier who's the best
4 certifier in the world, but the passed rules
5 increase the certification time by 30
6 percent.

7 It has increased the time that
8 farmers have to spend on the certification
9 paperwork, and it varies from certifier to
10 certifier exactly how that is imposed.

11 We have to leave farmers time to
12 farm and we have to keep the paperwork burden
13 down to as low as most bureaucrats would
14 like. I believe there's an office of
15 reduction of paperwork burden somewhere in
16 the USDA, is there? Perhaps I can take my
17 case there.

18 Organic dairy is widely
19 acknowledged as an entry point into organic
20 consumption, and I think organic dairy
21 represents six percent of the total sales of
22 dairy product within the United States.

1 About four percent in volume, I
2 think, of fluid sales of dairy product, and
3 approximately 1.3 percent the total volume of
4 milk produced, I think. And the reason I
5 think is because we don't have the data
6 available. We don't have parity with the
7 conventional world.

8 Despite the impressive growth and
9 innovation of organic dairy, when it comes to
10 AMS market news reporting, organic dairy as
11 part of the dairy programs is the newest
12 organic effort, less than two year old, is
13 still playing catch up to the other areas
14 with a bigger, longer lead time and more
15 organic staff.

16 We are well served by Eric Graf,
17 who made it to D.C. today. Thank you for all
18 the work you do. You've revolutionized our
19 database.

20 But despite his dedication,
21 resourcefulness and support from his
22 colleagues, this obviously has limits to what

1 can be accomplished.

2 And why is this important more so
3 for organic producers? Organic dairy
4 producers, unlike conventional producers,
5 negotiate directly the processes rather than
6 have a price set by the Federal Milk
7 Marketing Order.

8 And if you have two hours I can
9 give you a brief lecture on the Federal Milk
10 Marketing Order as well if you'd like, but
11 processes of access to their own unique
12 proprietary information, plus can pay for
13 costly industry reports.

14 In order to level the playing
15 field, when you come to contractual
16 negotiations, when you come to producers
17 making choices about their families' futures,
18 when you come to new entrants in the industry
19 who want to evaluate what their income is
20 going to be and how that income is going to
21 be worked out, we need accurate and readily
22 accessible data.

1 Without that the producers cannot
2 plan for the future, cannot make good
3 decisions about risk management and as I've
4 just said, not in an equal position of
5 negotiating the processes for a fair price.

6 There is no information of
7 marketing of cheese and other manufactured
8 nonfluid products, which is essential to
9 small to mid-sized operations, especially the
10 value added marketing done by organic dairies
11 who are aiming to supplement or to sell it on
12 the wholesale market.

13 Parity with nonorganic to have
14 reporting done in all classes of organic
15 milk, there are many dairy programs offices
16 in D.C. and hundreds when the market
17 administrative offices are included.

18 There is a wealth of data about
19 organic milk, bulk milk sales and geographic
20 flows within already collected Federal Milk
21 Market Order administrative data reported by
22 the milk plants, which is currently not

1 available to organic producers through the
2 market news.

3 We would like to see this made
4 available. We're not asking for any new
5 data, we're asking to be able to use the data
6 that is already there.

7 There's no cost, very little cost
8 in sharing information. And I can also
9 suggest how this sharing could be paid for.

10 Organic dairy is mostly Class I
11 milk, 75 percent to 80 percent I think is
12 sold as fluid milk, plays into the Federal
13 Milk Marketing Order pool, but gets no
14 benefit from it.

15 And we're talking about tens of
16 millions of dollars, so we divert some of
17 those tens of millions of dollars into paying
18 for some of these programs, and organic dairy
19 farms can get the benefit of the money that
20 goes into the Class I pool which they don't
21 benefit at this point.

22 Retail pricing, what we would like

1 to see is the same reporting of retail
2 pricing that you get with the conventional
3 milks, and hopefully extending it slightly to
4 include natural foods stores, Whole Foods,
5 Trader Joe's.

6 So it's a representative price
7 range reflecting all prices currently
8 offered, which is a more accurate
9 representation of pricing in the simple
10 average of nonsale prices of the two largest
11 brands in two stores.

12 Moving through on to anticipating
13 problems with -- she said stop. Should I
14 stop?

15 MR. LIPSON: No, go ahead and
16 finish up.

17 MR. MALBY: Oh, thank you very
18 much.

19 MR. LIPSON: Because we are quite
20 ahead of schedule.

21 MR. MALBY: Thank you. I
22 apologize for that.

1 MR. LIPSON: Not too much longer.

2 MR. MALTBY: I can tell a story is
3 really what I can -- anticipating the next
4 Farm Bill, the Representative Peterson has
5 brought in language which is going to form
6 the basis of the next Farm Bill.

7 And it comes as far as directly
8 from the foundation of the future produced by
9 the National Milk Federation, and part of
10 that is supply management and insurance, a
11 change in the way that the milk supply is
12 controlled.

13 This does not relate at all to
14 organic either in the insurance side, in the
15 marketing side or in the supply management
16 side.

17 And when this comes back to the
18 Secretary to be implemented in some form,
19 what we're asking for is that organic is
20 exempt and organic is represented, is a
21 commodity of conventional milk of the dairy
22 industry.

1 FSA and Rural Development,
2 essential to the development of value added
3 milk processing and value added meat
4 marketing, we need equal treatment of
5 facilities that handle organic product.

6 We don't see that in the
7 countryside, we don't see that in the
8 Northeast. In fact, restaurants get
9 preference.

10 GIPSA, that has to be passed,
11 implemented in order to ensure fair
12 contracts. A majority of organic producers
13 especially in dairy have individual contracts
14 and they need to be protected from abuse by
15 processes.

16 Any questions?

17 MR. LIPSON: Thank you. Okay,
18 anybody come in that we skipped? Beth,
19 Lindsey, Karri? Oh no, we did get, we have
20 Karri. And is Dick Siegel here? There he
21 is, okay.

22 You're on deck. Go ahead, tell us

1 your name and where you're from.

2 MS. SHUTE: Sure. Good afternoon,
3 my name is Lindsey Lusher Shute. I'm with
4 the National Young Farmers Coalition, a new
5 organization that was founded by and for the
6 next generation of organic and sustainable
7 growers in the United States.

8 I'm also, my husband and I run a
9 CSA farm, noncertified organic in the Hudson
10 Valley of New York State, and we serve about
11 500 families in New York City and in the
12 Hudson Valley.

13 So as you're all no doubt aware,
14 organic agriculture is driving much of the
15 renewed interest in farming as a career in
16 the United States.

17 Young people are looking to
18 organic farming as an opportunity for
19 independence, leadership and as a healthy way
20 to contribute to their communities.

21 Given the need for hundreds of
22 thousands of new growers in the United States

1 as identified by Secretary Vilsack, and
2 growing demand for organics, this is very
3 positive.

4 But it's important to emphasize
5 how vulnerable these farmers are within their
6 first few growing seasons.

7 In a recent survey by our
8 organization of 1,000 young and beginning
9 farmers, 80 percent of whom are self
10 identified organic growers, I don't know if
11 they're certified or not, but their biggest
12 needs and challenges are need for capital,
13 land access and health insurance, probably no
14 surprise.

15 USDA programs for organic growers
16 like EQIP do help to meet some of the capital
17 needs of organic growers but can do a lot
18 more.

19 Anecdotal evidence suggest that
20 NRCS agents are making EQIP information
21 available to beginners and that many
22 beginners are being offered cost sharing

1 contracts, but that few beginning farmers are
2 receiving the 30 percent advance payment that
3 they qualify for under the 2008 Farm Bill.

4 Without an advance payment, some
5 beginning farmers are seeking loans to cover
6 the cost of EQIP projects or not
7 participating at all.

8 Of course, with more extensive
9 EQIP projects we recognize that a loan might
10 be necessary, but it certainly doesn't make
11 sense for growers to borrow more than they
12 need or to get loans unnecessarily.

13 Therefore, we strongly encourage
14 USDA to regularly remind its NRCS state
15 offices and agents about the advance payment
16 option and create materials targeted at
17 beginners to help them navigate the program,
18 and remind their local agent of the advance
19 payment option.

20 Such materials should be readily
21 available at usda.gov. Furthermore, we are
22 encouraged that USDA is working with its NRCS

1 agents on education around organics. But we
2 still receive reports that EQIP programs are
3 conflicting with the National Organic
4 Program.

5 As an example, a young organic
6 grower who received EQIP funding for the
7 construction of a deer fence was told to
8 maintain that fence with Roundup.

9 Growers are working through these
10 conflicts on a case-by-case basis, but an
11 unsupportive and conflicting process is very
12 time consuming and stressful especially for a
13 newcomer.

14 USDA should create more
15 coordination and crosswalks between the
16 National Organic Program and its other
17 agencies and programs to enable full
18 participation by organic growers.

19 In regards to certification, many
20 of the beginners that we work with are
21 seeking to certify their farms as organic,
22 which is another program where the need for

1 capital comes into play.

2 The national organic cost share
3 program is absolutely essential for these
4 growers.

5 Within the National Organic
6 Program beginners are dependent on third-
7 party certifiers to make sense of the
8 definitions and procedures. They're doing a
9 wonderful job.

10 Beginners however would even like
11 more simplified information on these programs
12 from USDA and would benefit from a
13 coordinated package of technical, marketing
14 and financial assistance, again through
15 usda.gov.

16 I just repeat this. The more
17 centralized information that can get out
18 through the Internet makes all the difference
19 when, you know, the local offices sometimes
20 give conflicting information.

21 So if they have something in their
22 hands that they have when they go into that

1 office, it makes all the difference and
2 empowers them.

3 Another small yet important
4 suggestion is for USDA to offer OMRI
5 approved materials, lists at usda.gov for
6 free. I know that that logistically might be
7 challenging, but right now an advanced
8 material search on OMRI costs \$60.

9 It doesn't seem like a lot, but
10 when you might be taking a loss in your first
11 season of farming, stuff like that actually
12 will prevent growers from certifying organic.
13 So any way we can make that more affordable
14 would be wonderful.

15 Lastly, organic growers need more
16 research on organic growing practices and
17 NRCS and extension agents must be versed on
18 what's already out there.

19 Growers routinely report that
20 extension agents do not have expertise in
21 organic controls and techniques.

22 This is especially true with our

1 farm in particular with the late blight that
2 happened throughout the Northeast a couple of
3 years ago. Leading up to the blight we had
4 no support from our local extension agents on
5 how to deal with the blight with organic
6 controls.

7 So thank you very much for the
8 opportunity to comment today and we look
9 forward to working with you all to support
10 young and organic and beginning farmers.

11 Thanks.

12 MR. LIPSON: Thanks. Any
13 questions from anybody? I just want to know
14 what happened with the tomato season this
15 year.

16 MS. SHUTE: The tomato season? It
17 was going great until, we're about 100 miles
18 north of New York City so we got Irene first.

19 We lost about an acre of tomatoes
20 during the original late blight a couple of
21 years ago, and so now we have all of our
22 tomatoes under protective covering to prevent

1 them from getting rain, which of course, you
2 know, late blight is airborne.

3 So we took down all of our
4 protective coverings so they didn't blow
5 away, and then we got Irene, and then we got
6 the remnants of Lee and so now they all have
7 late blight.

8 So anyways, it's better. At
9 least, you know, we did have tomatoes so
10 that's an improvement.

11 MR. LIPSON: Okay, thanks.

12 MS. SHUTE: Great, thanks.

13 MR. LIPSON: Okay, Beth, we're
14 still looking for, but Mr. Siegel, if you're
15 ready.

16 MR. SIEGEL: Good afternoon. I'm
17 very pleased to be back here in this
18 auditorium because I used to work at USDA.
19 I'm very happy to see a lot of old friends,
20 including Mark Lipson.

21 And Mark, congratulations on the
22 award that you're going to receive tomorrow

1 from a very grateful organic community.

2 My name is Richard Siegel, S-I-E-
3 G-E-L. I'm a lawyer in private practice in
4 Washington, D.C., and since 1998 I have
5 focused my practice on the National Organic
6 Program.

7 I have advised and represented a
8 wide variety of companies and associations
9 that are subject to the NOP regulations.

10 I'm not here on behalf of a
11 client, I'm here as a matter of personal
12 opinion about this matter that I'm going to
13 raise.

14 I've come to this listening
15 session to express my concern with the recent
16 instruction that the NOP has issued that sets
17 a new policy for releasing information on
18 enforcement actions that are taken against
19 certified organic operations.

20 This instruction is NOP Number
21 2607, disclosure of information concerning
22 certified operations. It states that all

1 pending enforcement actions that the NOP and
2 certified agents take against certified
3 operations beginning with the first notice of
4 noncompliance, will be freely disclosed to
5 the public at any time.

6 Now the intent of this policy is
7 to make the NOP's enforcement activities
8 wholly transparent, but in my opinion this
9 policy achieves this transparency at the
10 expense of fundamental due process rights
11 that operations have once they are certified.

12 This policy introduces a new risk
13 of business uncertainty for certified
14 operations in the organic industry, and thus
15 this may impede the future growth of the
16 organic industry.

17 This policy will put sensitive
18 information about enforcement actions into
19 the public's hands long before the NOP's
20 deliberate enforcement process is completed.

21 Because of the keen interest in
22 the organic community about compliance and

1 enforcement, it is likely that if a high
2 profile organic operation receives a
3 noncompliance notice this will be readily
4 publicized and perhaps in an inflammatory
5 way.

6 To publicize the noncompliance
7 action in this way would be highly misleading
8 because this is only the first step in the
9 long NOP enforcement process.

10 Until now the NOP has treated all
11 pending enforcement actions as confidential
12 until they have been completed. As a result,
13 certified operations have not had to fear
14 that they would be exposed to premature
15 damaging publicity in the marketplace.

16 And now certified operations have
17 every reason to expect that their organic
18 status will be publicly called into question
19 before all the facts are in.

20 Now certified operations meet high
21 standards in order to become certified. They
22 incur the time and financial cost to be

1 certified initially, they must keep their
2 certification updated each year, they are
3 subject to unannounced inspections and audits
4 at any time.

5 Therefore, whenever a certified
6 operation receives a notice of noncompliance,
7 the operation should naturally be afforded a
8 reasonable opportunity to answer, to
9 challenge it before its hard-earned
10 certification is suspended or revoked.

11 In fact, without this assurance of
12 due process a company would think twice about
13 trying to get NOP organic certification in
14 the first place.

15 The enforcement process must take
16 time to ensure that there is a full and
17 deliberate hearing. On receiving a notice of
18 noncompliance the certified operation has the
19 opportunity to correct the noncompliance or
20 offer a rebuttal.

21 If this does not resolve the
22 matter, the next step is a proposed notice of

1 suspension or a proposed notice of revocation
2 with 30 days for the certified operation to
3 appeal to the administrator of AMS.

4 Until the appeal is resolved, the
5 certified operation continues to operate as
6 before. Organic certification remains in
7 effect until it is revoked, suspended or
8 voluntarily surrendered.

9 Now the new policy on disclosure
10 of enforcement actions short circuits these
11 enforcement rules by requiring public
12 disclosure every time a certified operation
13 has been cited for any noncompliance.

14 This undermines due process and
15 could well discourage some companies from
16 staying or becoming organic.

17 So in closing, I recommend that
18 the NOP reexamine this new disclosure policy.
19 The Freedom of Information Act, FOIA, F-O-I-
20 A, does not necessarily compel the NOP to
21 make these disclosures.

22 There is Exception 5 of FOIA, in

1 which the agency is to withhold documents
2 that are pre-decisional inside an agency.
3 Now the entire NOP enforcement process is
4 designed as pre-decisional and deliberative
5 within AMS, so it should qualify for
6 Exception 5.

7 In addition, there is another
8 exception to FOIA, Exception 7, which calls
9 for withholding sensitive documents naming
10 parties in connection with law enforcement.

11 And this has to do with, this has
12 been extended by the courts to apply to
13 licensing arrangements such as a certified
14 operation being licensed, that's considered
15 law enforcement legally under FOIA.

16 So NOP should, the enforcement
17 actions of NOP should be protected and could
18 be withheld under Exception 7 as well.

19 Finally, because I believe it is
20 so important that the NOP continue to give
21 certified operations due process when they
22 are cited for noncompliance, I am opposed to

1 the change in the appeal regulation that the
2 NOP is proposing.

3 This would provide that whenever
4 the NOP itself has initiated an enforcement
5 action against a certified operation there
6 would be no appeal to the AMS administrator.

7 I have a good deal of respect for
8 the NOP staff members. I'm here in the midst
9 of them. They are knowledgeable and
10 conscientious public servants, but they are
11 also human beings and they're not infallible.

12 So it is vital that after the NOP
13 has issued an enforcement decision, a
14 certified operation should continue to have
15 the right to appeal that decision over the
16 head of the NOP to the AMS administrator
17 before there are formal proceedings before an
18 administrative law judge.

19 Thank you for your attention.
20 I'll be happy to answer any questions.

21 MR. LIPSON: Anybody got a
22 question? I guess I'm just wondering,

1 without offering any specific names or cases,
2 it's not clear from what you've said whether
3 there have been actual instances of harm by
4 the disclosure process.

5 MR. SIEGEL: This is a new policy.
6 I know that I would be able to tell my
7 clients in the past that they were safe from
8 this sort of publicity.

9 Now with this, this is a new
10 thing, maybe it hasn't been implemented. I'm
11 not aware of any cases. I'm just saying that
12 the potential is very clear for this kind of
13 happening.

14 MR. LIPSON: Miles, do you have a
15 question?

16 MR. MCEVOY: Yes. We've gotten a
17 lot of comments on this particular policy and
18 we've examined those, that input and we're in
19 the process of revising the actual policy.

20 So we're working on that one. So
21 thanks for your comments and it's really
22 important to us.

1 MR. SIEGEL: Thank you, Miles.

2 MR. LIPSON: Okay, thanks. Mr.
3 Etka? Yes, thanks.

4 MR. ETKA: Good afternoon. My
5 name's Steve Etka. I am Legislative Director
6 for the National Organic Coalition.

7 There are many, many programs of
8 great importance and relevance to our
9 members, but I'm going to focus my comments
10 on two specific areas.

11 One, the crisis in public sector
12 of plant and animal breeding, and two, the
13 need to formalize a process of input from the
14 National Organic Program to the National
15 Institute for Food and Agriculture, NIFA,
16 about research priorities related to NOP
17 decision making.

18 On the topic of public sector
19 plant and animal breeding, in recent decades
20 public resources for classical breeding have
21 dwindled while resources have shifted towards
22 genomics with a more narrow focus on a

1 limited set of major crops and breeds.

2 This shift has significantly
3 curtailed the public access to the plant and
4 animal germplasm, and limited the diversity
5 of seed variety and animal breed development.

6 The problem is particularly acute
7 for organic and sustainable and local food
8 systems where it is of paramount importance
9 that farmers have access to germplasm well
10 suited to their unique cropping systems and
11 their local environment.

12 In the 2008 Farm Bill, Congress
13 mandated that conventional/classical plant
14 and animal breeding be a priority within the
15 AFRI program.

16 In years previous to and
17 subsequent to this Farm Bill requirement, the
18 Senate Appropriations Committee has
19 consistently included report language calling
20 on USDA to make classical plant and animal
21 breeding a priority within AFRI and its
22 predecessor program, the NRI.

1 Despite the clear intent of
2 Congress in this regard, USDA has failed to
3 fund classical plant and animal breeding
4 projects through AFRI.

5 In a recent analysis by the
6 National Organic Coalition it was shown that
7 of the 127 plant related research projects
8 funded by AFRI since the passage of the 2008
9 Farm Bill, only one classical or conventional
10 breeding project has been funded.

11 And of the 59 animal related
12 projects there was zero classical breeding
13 projects funded. There is one RFA process
14 left and remaining for the AFRI program
15 before the next Farm Bill is supposedly
16 passed in 2012.

17 We are urging USDA to include a
18 clearly segregated funding stream for
19 classical breeding within this upcoming RFA,
20 with a clear requirement for development and
21 release of publicly available cultivars as
22 part of the requirements for receiving

1 funding in this area.

2 And I do have a copy of that
3 analysis if it's possible to submit it for
4 the record.

5 My other topic is also research
6 related but this one involves the issue of
7 coordination between the National Organic
8 Program and the research functions at USDA.

9 There are three USDA competitive
10 grant research programs that have relevance
11 to organic research topics. They are the OREI
12 program, the Organic Transitions Program and
13 the AFRI program itself.

14 As part of the work of the
15 National Organic Program, there are often
16 regulatory decisions that must be made by NOP
17 and its advisory committee, the National
18 Organic Standards Board, where research could
19 help with the decision making process or
20 could actually solve regulatory dilemmas.

21 Most recently the NOSB was facing
22 a decision about whether to continue to allow

1 the use of antibiotics on apples and pears to
2 address fire blight, in spite of strong
3 consumer concerns about the use of
4 antibiotics in organic food production.

5 Fire blight is not new, consumer
6 concern about antibiotic use in food
7 production is not new, and yet the NOSB was
8 faced with this awful dilemma of either
9 responding to consumer concerns or
10 threatening the viability of organic apple
11 and pear growers by taking away their tools
12 to address fire blight as if these problems
13 had not been anticipated.

14 There are things that we can do to
15 get ahead of these situations and there are
16 things that USDA can do to help that process.

17 First, to my earlier point, USDA
18 research should be available to help in the
19 process of breeding new cultivars and root
20 stock that are resistant to fire blight.

21 But research should also be
22 focused on identifying alternative cultural

1 systems in planting practices that help
2 prevent fire blight.

3 Second, I believe this example
4 really underscores the need to have a more
5 formalized process whereby the National
6 Organic Program writes to NIFA annually, or
7 in some cases more often than annually,
8 laying out research topics that would be
9 helpful in NOP's decision making process.

10 This letter should be written at a
11 time when that input could be fed into the
12 RFA development process for the three
13 competitive research grant programs that I
14 mentioned.

15 And certainly not all NOP research
16 needs can be identified in advance but many
17 can. Having a tighter communication loop
18 between NOP and NIFA, even though they are in
19 separate mission areas, I think would not
20 only strengthen USDA's overall coordination
21 on organic issues, but would also enhance the
22 integrity of USDA's organic seal.

1 So thanks for the opportunity to
2 give you these thoughts.

3 MR. LIPSON: Great. Thank you,
4 Steve. I think we may need to rotate some of
5 our panel members out. It is a very busy
6 time at USDA, so not everybody's able to
7 spend the whole day here.

8 So thanks for those who need to
9 get back to their desks. Did Beth arrive?
10 All right. Anybody else due to come up and be
11 an official listener? Please introduce
12 yourself.

13 MS. BLUE: Hi, I'm Rebecca Blue.
14 I'm the Acting Deputy Undersecretary at
15 Marketing and Regulatory Programs.

16 MR. LIPSON: Thanks, Rebecca. All
17 right, I have Beth, and then Kristina
18 Hubbard, and then Mark Kastel, and then it
19 will be time for a short break at that point.
20 Please.

21 MS. LARABEE: Okay. My name is
22 Beth Larabee. I'm with the Iowa Organic

1 Association, and have only been with the
2 group for about seven weeks, so I'm still
3 brand new.

4 But we had the opportunity to come
5 and speak to you today and so I will deliver
6 to you what my constituents told me in the
7 last week or so.

8 Iowa Organics needs continued
9 research. We need to know about the
10 economics of organic production. We need to
11 understand more of the environmental
12 outcomes of organic production.

13 What things are our producers
14 delivering to the citizens of Iowa in the
15 form of cleaner water, safe food, soil
16 conservation, water conservation? There's a
17 whole suite of things that are provided by
18 organic and sustainable farmers.

19 They have a very real concern
20 about having access to non-GMO seeds. We
21 have fewer and fewer sources for organic
22 seed. The few breeding programs that are out

1 there especially for -- growers in Iowa grow
2 a lot of organic corn.

3 There are not breeding programs
4 specific to organic production of corn.
5 Traditional breeding programs take a long
6 time. It can be a five- to ten-year cycle to
7 actually get new varieties out to the
8 farmers.

9 And that process has to continue.
10 You can't turn it off like a faucet and stop
11 it for two or three years and then expect it
12 to start again. You have to start over.

13 We need models that are specific
14 to bioregions. Farming in Iowa is much
15 different than farming in Georgia.

16 They have concerns about things
17 like the crop insurance. Why do organic
18 producers pay a five percent premium above
19 conventional farmers?

20 And again I'll use the example of
21 corn. Organic corn is \$6.50, \$7 a bushel.
22 Conventional corn is \$6.50 or \$7 a bushel.

1 There was a time when organic corn was a more
2 valuable crop. It isn't that way anymore.

3 But we're still paying that five
4 percent extra because ours are grown
5 organically. We feel like we nearly need to
6 be treated like any other producer and be
7 insured with, our crop be insured in the same
8 way.

9 There's a few things that we
10 really find helpful. The EQIP program is
11 absolutely essential to organic farmers and
12 transitioning farmers.

13 This is the one program that a lot
14 of times will make or break an organic
15 farmer, especially a beginning organic
16 farmer. We really hope this continues to be
17 funded.

18 We also want to make everyone
19 aware of the amount of small business growth
20 that's happening with organic production.
21 Even during the depth of our economic
22 downturn, organics was growing at an eight

1 percent rate.

2 There's not many other businesses
3 out there that you can say was growing at an
4 eight percent rate in the last two years.
5 Before we hit this recession we were growing
6 at a rate of 20 percent per year.

7 There is a great deal of potential
8 to grow business and jobs in Iowa with
9 organic farmers as their base. Every time we
10 put twenty more organic farmers into
11 production, we need someone that supplies
12 them with materials.

13 We need someone that supplies them
14 with small scale equipment. There is a very
15 good reason for us to want to do those things
16 and keep our dollars in Iowa.

17 And that's about all I have.

18 MR. LIPSON: Okay. Thank you,
19 Beth. Any questions from the panel? Sharon?
20 Sorry, Cathy? Yes? Why don't you use the
21 microphone up there? And introduce yourself,
22 please.

1 MS. GREENE: Cathy Greene in
2 USDA's Economic Research Service. And I was
3 curious about Iowa's breeding program and how
4 that's funded and to what extent it can help
5 provide some of those needed varieties.

6 MS. LARABEE: Right now there is
7 no funding at Iowa State University for
8 organic corn. So I really can't speak to
9 that because it doesn't exist for us in our
10 state.

11 MS. GREENE: Okay, thank you.

12 MS. HESTVIK: Hey, Mark, I just
13 want to say -

14 MR. LIPSON: Go ahead. Introduce
15 yourself, please.

16 MS. HESTVIK: RMA, the crop
17 insurance program did offer a new price
18 election for corn this year, which is double
19 the conventional price, so it is available to
20 farmers now.

21 It was \$6 for the conventional
22 price, and the corn was \$11. And the harvest

1 price is coming up at about \$13 a bushel.

2 MR. LIPSON: Sharon, would you go
3 ahead and introduce yourself?

4 MS. HESTVIK: Oh, hi. I'm Sharon
5 Hestvik and I'm with the Risk Management
6 Agency. We do crop insurance and other risk
7 management tools for producers.

8 And in 2010, we actually insured
9 over 4,000 organic producers and we have
10 550,000 acres insured. And in 2010, we also
11 paid out about \$18 million in losses. So
12 crop insurance is catching on and we are
13 providing more tools for farmers.

14 And we have four new prices
15 available for organics on corn, processing
16 tomatoes, cotton and soybeans. And beginning
17 in 2013, we're offering a new price on
18 avocados in California.

19 MR. LIPSON: Great, thank you.
20 Kristina? Oh, did you have another comment,
21 Beth?

22 MS. LARABEE: I was just going to

1 say that that's something that we're seeing,
2 fruit and vegetable farmers starting to
3 really become a viable option in Iowa.

4 And that's one of the things we're
5 trying to figure out is, how do we set up the
6 process so that fruit and vegetable farmers
7 can get their three years of production
8 information so we can go to you for
9 insurance?

10 How do we teach our farmers how to
11 get this information together so we can say,
12 here's my production history? Here's my
13 dollar value history, to help us get insured.

14 MS. HESTVIK: Okay, thank you.

15 MR. LIPSON: Thanks, Beth.

16 MS. HUBBARD: Good afternoon.

17 Thanks for hosting this listening session
18 today on such an important subject. My name
19 is Kristina Hubbard, and I'm the Director of
20 Advocacy for Organic Seed Alliance.

21 We are an organization that
22 supports the ethical development and

1 stewardship of the genetic resources of
2 agricultural seed.

3 We engage farmers and other seed
4 professionals in our research and education
5 programs to develop regional decentralized
6 seed systems that provide biologically
7 diverse seed that's appropriate for organic
8 farming systems.

9 And we also work pretty hard to
10 influence policy decisions that impact the
11 integrity of these systems that we aim to
12 create.

13 Earlier this year we published a
14 report called State of Organic Seed, and I'm
15 happy to provide you all a copy afterward if
16 you wish.

17 This report is the first
18 comprehensive analysis of the opportunities
19 and obstacles in building the organic seed
20 sector.

21 And while our data shows that
22 farmers are increasing their attempts to

1 source more organic seed and certifiers are
2 encouraging them to do so, the lack of
3 available organically bred and produced seed
4 remains a major barrier to the ongoing growth
5 and success of the organic industry.

6 In short, organic producers are
7 underserved in genetics that are appropriate
8 for their copying systems, regional climate
9 and market niches.

10 Our data also shows that -- well,
11 we conducted a survey with certified organic
12 farmers in 45 states, and more than 80
13 percent of respondents related that, or I
14 should say they believe that, seed bred in
15 organic soils and organic systems is
16 important to the overall success of organic
17 agriculture.

18 Yet, investments in organic seed
19 projects and organic plant breeding lags
20 behind the tremendous growth we've seen in
21 the organic sector, which is now valued I
22 believe at \$29 billion in 2010 alone.

1 In contrast we've had \$9 million
2 invested in organic seed projects, but this
3 is over the course of 14 years.

4 So here's one way that the
5 Department can intensify its support for
6 organic agriculture. One of the outcomes of
7 this report we did were four working groups
8 that Organic Seed Alliance is facilitating.

9 One is the organic plant breeding
10 working group comprised of about a dozen
11 public plant breeders across the U.S. And
12 they relay that they need more long term,
13 consistent funding for organic plant breeding
14 projects.

15 Data from our report shows that
16 several organic plant breeding projects
17 didn't result in a finished variety, in part
18 because funding only lasted one or two years
19 when many of us know here in the audience
20 that bringing a finished cultivar to the
21 market demands investments for four to 12
22 years at times.

1 So we need longer term funding and
2 we need more funding in important research
3 programs such as OREI, already mentioned.

4 Funding is also needed to support
5 field trial networks so that we can identify
6 what germplasm performs best in organic
7 systems.

8 And when optimum genetics are
9 identified, we also need to fund education to
10 help breeders and farmers producing seed to
11 navigate the process of commercializing a new
12 variety.

13 And finally, we need to fund
14 farmers involved in these projects,
15 especially in participatory plant breeding
16 projects. This is a golden opportunity to
17 support family farmers while developing
18 infrastructure for these organic seed systems
19 that we need in order to meet the demand of
20 the growing organic industry.

21 And this is especially important
22 in the face of a consolidated seed industry

1 that has nonorganic interests.

2 So rebuilding public plant
3 breeding programs is obviously essential to
4 expanding the choice to meet the diverse
5 needs of organic farmers.

6 The National Institute for Food
7 and Agriculture must honor the mandate from
8 Congress to provide meaningful funding for
9 developing public plant varieties.

10 Organic Seed Alliance also
11 supports creating an institute for seeds and
12 breeds for the 21st century as a distinct
13 subagency within USDA's National Institute
14 for Food and Agriculture to address this
15 urgent need and adequately fund classical
16 plant breeding.

17 It is especially important that
18 USDA funded research, much of the research
19 that I'm talking about, remains in the public
20 domain to ensure that the public has access
21 to germplasm and that we prevent the further
22 consolidation of an already concentrated seed

1 marketplace, as well as the concentrated
2 ownership of our plant genetic resource base.

3 The 2010 competition workshops
4 that USDA hosted in partnership with the
5 Department of Justice ignited a lot of hope
6 in farming communities, including the organic
7 community.

8 And they ignited hope because they
9 believed the agencies were truly confronting
10 some of the abuse of market power that we're
11 seeing, including the abuse of intellectual
12 property protections.

13 Unfortunately, neither USDA nor
14 the Department of Justice seemed inclined to
15 even release a report in response to the
16 thousands of comments that were hand
17 delivered at these workshops.

18 We urge USDA to continue working
19 with the Department of Justice to, at the
20 very least, respond to these comments and
21 ideally provide a plan of action.

22 We also have seen that research

1 and development has largely narrowed on other
2 industry interests including biotechnology,
3 which brings me to my last point, and we
4 believe USDA can better support organic
5 agriculture by confronting the challenges
6 posed by contamination of unwanted
7 genetically engineered material.

8 And this includes implementing
9 policies that ensures a shared responsibility
10 for contamination prevention, since right now
11 preventing the contamination of organic and
12 other nongenetically engineered products
13 rests solely on the shoulders of the
14 nonadopters.

15 Such measures, contamination
16 prevention measures, must be coupled with a
17 compensation plan. A plan paid for by patent
18 holders promoting and profiting from the
19 technology.

20 And this plan must covers cost for
21 immediate harm to producers and others in the
22 industry including seed companies, as well as

1 costs for contamination prevention.

2 Seed companies that I've been
3 talking to the last couple months who sell
4 organic seed at risk of contamination by
5 genetically engineered counterparts relay
6 that contamination happens, that they are
7 incurring costs and there is no recourse to
8 recoup any of these losses.

9 And so this is why it's especially
10 disconcerting that USDA is signaling a move
11 to limit its authority instead of
12 strengthening oversight in the face of
13 contamination events, and also in light of
14 recommendations of independent government
15 offices such as USDA's own Inspector General
16 in 2005, and the Government Accountability
17 Office in 2008.

18 For example, right now on the
19 table, USDA exploring what would advance an
20 already self-regulating system by putting an
21 option on the table to allow manufacturers of
22 genetically engineered crops to perform their

1 own environmental assessment, which is an
2 indisputable conflict of interest.

3 Studies that are scientifically
4 rigorous and conducted by independent parties
5 have never been more important to assess the
6 safety and performance of genetically
7 engineered crops. Thanks for the comments.

8 MR. LIPSON: All right. Thank
9 you, Kristina.

10 MS. HUBBARD: Yes?

11 MR. LIPSON: Just one quick
12 question I had. Does your group have an
13 estimate of the number of organic seed
14 producers? How many farmers are producing
15 organic seed for the marketplace?

16 MS. HUBBARD: That's a good
17 question. I would have to look at the
18 report, Mark, I don't know the number right
19 off the top of my head.

20 I do know that those who responded
21 -- oh, that doesn't count though, because the
22 farmers who responded to our national survey,

1 it was just about ten percent of certified
2 organic crop producers, but those aren't all
3 seed producers of course.

4 So I don't know that off the top
5 of my head, but I'd be happy to find the
6 number for you.

7 MR. LIPSON: Okay. It's an
8 important baseline that we'd like to know.

9 MS. HUBBARD: Yes, okay.

10 MR. LIPSON: I was going to do one
11 more and then break. Doug, did you want to
12 say hi?

13 (Off microphone comments.)

14 MR. LIPSON: Doug was in this
15 morning's lineup and was one of the people
16 who had to attend the Secretary's emergency
17 meeting. Thanks for coming.

18 Okay, one more, Mr. Kastel, and
19 then we will take a break before finishing
20 the final sequence of comments.

21 MR. KASTEL: Thank you, Mark, and
22 thank you for all the hardworking USDA folks

1 who are spending their time with us today.

2 I'm Mark Kastel. I'm the Co-
3 director of The Cornucopia Institute. We're
4 based in Cornucopia, Wisconsin.

5 We're big supporters of the
6 organic label, and we're big supporters of
7 the organic label because it really
8 represents the best economic justice vehicle
9 for family scale farmers, and it has for
10 decades now.

11 We're also big supporters of the
12 current changes at the National Organic
13 Program in terms of staffing, budget and
14 philosophy.

15 But this program should strive for
16 excellence and we're not quite there yet. So
17 through free association I'm going to throw a
18 few issues at you here.

19 Want to grow organic operations to
20 20,000? Number one, we need to revisit the
21 exemption for \$5,000. That number was
22 promulgated in the late 1980s. We've had a

1 little thing called inflation kick in since
2 then.

3 It probably realistically needs to
4 be \$10,000 or \$15,000. But that will bring
5 into our community a lot of these really high
6 level, high quality, local producers, local
7 marketers that aren't certified like right
8 now.

9 But we can make sure that they
10 legally have to abide by the law and they can
11 use that organic seal which will, or the name
12 "organic", which will lend credibility to
13 this movement.

14 Want to have a net gain of
15 farmers? You're looking for 20,000? We need
16 to aggressively enforce the laws we have
17 right now.

18 Questionable imports from China
19 and India, large scale fraud, we've just
20 busted as a community a large scale
21 perpetrator in Canada shipping in feed grains
22 in the United States, has resulted this year

1 in an estimated 20 percent loss of crop, to
2 cash crop acreage in the Midwest producing
3 grain both for food grade and feed grade
4 production.

5 In organics we can't instantly
6 replicate that production. We're going to
7 see some market disturbances for livestock
8 producers.

9 We need really good enforcement.
10 Lack of enforcement, slow enforcement has
11 catastrophic impacts on the marketplace. We
12 need a fair and level playing field.

13 A few words about organic
14 livestock and dairy. First, origin of
15 livestock, and I'm paraphrasing here from the
16 regs.

17 But once a distinct dairy herd is
18 converted to organics, from that point
19 forward all animals brought onto that farm
20 must be managed organically from the last
21 third of production.

22 I'm not sure why historically

1 that's been so hard to understand by the
2 National Organic Program, but that law isn't
3 being enforced.

4 It was misinterpreted during the
5 Bush years, it's been misinterpreted during
6 the Obama/Vilsack administration. There's
7 been the suggestion that we need new rule-
8 making. We don't necessarily concur.

9 But during the Bush
10 administration, the outgoing director at the
11 NOP said this was a priority in the last
12 years of that administration.

13 The new incoming administration
14 here said that was a priority. This is a
15 maturing administration at the National
16 Organic Program, we really need a rule out
17 quickly.

18 This is competitively injuring
19 farmers who feed their calves from day one,
20 organic milk, the same quality and value that
21 we find in the grocery store, and for the
22 entire, roughly two years of the life of that

1 animal before she's mature and enters the
2 milking chain, has 100 percent certified
3 organic diet.

4 They're competing generally with
5 industrial scale farms that are buying one-
6 year-old conventional animals and converting
7 them to organics.

8 Grossly unfair, and we read
9 illegal. We need the factory dairies to
10 experience a heavier degree of scrutiny.

11 There are outstanding legal
12 complaints against Natural Prairie, a 9,000
13 acre facility in Texas, Dean Foods in Idaho,
14 Shamrock in Arizona.

15 And we need all dairies in the
16 United States with over 1,000 cows inspected
17 by the USDA because of the systemic problems
18 we've seen.

19 I want to just blow through a few
20 more of these. Since we're ahead of schedule
21 maybe you'll give me an extra 30 seconds.

22 We need due process, but we can't

1 tolerate the kind of delays we've seen with
2 Promiseland's livestock allegedly laundering
3 conventional cattle and an enforcement action
4 commencing in 2007, and then just being
5 forced out of organic commerce this year.

6 That's unfair to consumers, unfair
7 to ethical participants in this industry.
8 NOP investigators need the same kind of law
9 enforcement authority as the AMS has.

10 We need sworn law enforcement
11 officials that when they go out to
12 investigate serious allegations of fraud can
13 take sworn testimony and compel people to
14 tell the truth.

15 When the Aurora scandal was
16 investigated the AMS investigators took
17 testimony from Cornucopia and other parties,
18 and they came to the facts that might not
19 have been ascertained otherwise if they
20 didn't have that authority.

21 We need to promote openness.
22 President Obama, when he was elected said

1 that the Departments under his executive
2 authority would bend over backwards to make
3 sure that FOIAs were complied with as openly
4 as completely as possible.

5 We have seen in our FOIA request,
6 virtually no difference between the
7 withholding of documents and the wholesale
8 redaction that we saw during the Bush
9 administration.

10 These documents become virtually
11 worthless and without meaning, and we think
12 that should be revisited at the USDA and
13 particularly in the organic movement.

14 And finally I want to address the
15 appointment process at the USDA for the
16 National Organic Standards Board.

17 This has been ripe for abuse in
18 the past, and even during this new
19 administration that has generally been more
20 respectful of the will of Congress by
21 appointing qualified individuals that meet
22 the definition for farmer, certifier,

1 processor, in the last round we had an
2 individual who's a full time employee of a
3 \$750 million a year agribusiness concern who
4 does not own and operate a certified organic
5 farm, take the farmers' position.

6 And I can tell you that we heard
7 from our members at the Cornucopia Institute.
8 People who applied in good faith, people who
9 were eminently qualified to sit in that chair
10 who were demoralized -- in fact, that was two
11 cycles ago -- and didn't bother applying last
12 time.

13 So we really need an openness.
14 We'd like to see who the appointments are, so
15 as a community we can collaborate with you so
16 the best and brightest are appointed, and I'm
17 sure that's the goal of the policymakers at
18 the USDA. Thank you.

19 MR. LIPSON: Great. All right,
20 thank you, Mark. Any questions, anybody?

21 MR. KASTEL: Thank you, all.

22 MR. LIPSON: All right, thanks,

1 Mark. Okay, it's 2:30. We will take a ten-
2 minute break and then we'll still be a bit
3 ahead of schedule.

4 So please make your way back here
5 promptly. Thanks.

6 (Whereupon, the foregoing matter
7 went off the record at 2:32 p.m.
8 and resumed at 2:48 p.m.)

9 MR. LIPSON: Okay, we are running
10 ahead of schedule. So we've only got a few
11 more commenters and then, I know it's
12 unfortunate, but we'll be ending early.

13 So we have John Thorne, Shepherd
14 Ogden, Mr. Ogden's here, Patty Lovera is
15 here, Jaydee Hanson is here and Colin O'Neil.
16 Hopefully Colin will show up just in time.

17 So we have some new listeners.
18 I'd like once again, just to acknowledge all
19 the great support that we have gotten from
20 folks in the Department today to be
21 listeners.

22 We've gotten a great spread of

1 folks from all over the Department, both
2 members of the Organic Working Group and
3 senior USDA officials who are taking this,
4 you know, appropriately, very seriously.

5 So those who haven't introduced
6 themselves, please do, and then we'll go
7 ahead.

8 MS. PEET: Okay. Mary Peet. I'm
9 currently with NIFA as a Division Director,
10 but before that and still continuing, I run
11 the, one of the two people that run the
12 organic program.

13 And that's two grant programs,
14 OREI, the Organic Research and Extension
15 Initiative and also Organic Transitions,
16 which is the other component of the organic
17 program in NIFA.

18 So looking forward also to hearing
19 comments on our research programs, and maybe
20 even some good stuff about what our research
21 programs have done for you. So thanks, Mark.

22 MR. LIPSON: Jill?

1 MS. AUBURN: And I'm Jill Auburn.
2 I'm in the Office of the Chief Scientist,
3 which is a relatively new office at USDA that
4 supports Undersecretary and Chief Scientist,
5 Catherine Woteki, who you heard from the
6 first thing this morning.

7 I normally work on sustainability
8 issues there and include organic among them.
9 I'm also currently for a short time, Acting
10 Director of that office. Thank you.

11 MR. LIPSON: Great, thank you.
12 All right, okay, sir? Your name and where
13 you're from.

14 MR. BUSCHING: My name is Mark
15 Busching and I'm filling in for John Thorne.
16 I'm Senior Counsel with Crowell & Moring. I
17 have some brief remarks and then a submission
18 for the record.

19 I want to thank the members of the
20 USDA Organic Working Group and the USDA
21 National Organic Program for hosting this
22 session and the opportunity to provide

1 comments.

2 Your August 11, 2011, memorandum
3 for the chairperson of the National Organic
4 Standards Board acknowledged and accepted
5 their April 2011 recommendations including
6 their recommendation to remove the 20 percent
7 annotation on sodium nitrate.

8 The recommended removal this
9 annotation would completely prohibit the use
10 of sodium nitrate in organic crop production.

11 If the NOP promulgates a final
12 rule removing the annotation, sodium nitrate
13 could not be used as a fertilizer, an
14 ingredient in a fertilizer or a soil
15 amendment in an organic crop production after
16 October 12, 2012.

17 This is a serious concern that
18 NOSB's actions came in direct response to
19 your September 21, 2010, action memorandum
20 requesting the prohibition of sodium nitrate
21 to help the NOP harmonize U.S. organic
22 standards and provide, to borrow a phrase

1 from Emerson, a foolish consistency with
2 certain countries to facilitate international
3 trade in organic products.

4 It is important to note that there
5 is a strong widespread support for continued
6 use of sodium nitrate with the 20 percent
7 annotation. The comments that have been
8 submitted reflect that.

9 Disallowing sodium nitrate would
10 adversely affect small organic producers and
11 discriminate against producers in more
12 temperate regions in the United States.

13 In essence, it would hurt jobs in
14 the U.S. at a time when the unemployment rate
15 is over nine percent.

16 There are no good alternatives to
17 sodium nitrate for conditions where it is
18 needed. Sodium nitrate is only needed
19 occasionally during the growing season. But
20 when it is needed there are no effective
21 substitutes.

22 Sodium nitrate is not an

1 environmental contaminant, which it is why it
2 is unnecessary to disallow its use in organic
3 crop production. It is not an environmental
4 hazard as the NOSB has concluded.

5 Life cycle energy costs for sodium
6 nitrate are unlikely to exceed that from
7 manure. Furthermore, it is estimated that 50
8 percent of the energy mining process for
9 under sodium nitrate comes directly from
10 captured solar energy not fossil fuels.

11 Use of sodium nitrate is
12 consistent with organic agricultural
13 sustainability focus. For more than 100
14 years sodium nitrate has been mined from
15 ancient mineral deposits in Chile.

16 Incorporating sodium nitrate with
17 a 20 percent annotation into a broad based
18 nutrient management is consistent with both
19 organic production and sustainable
20 agriculture.

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

1 Sodium nitrate is essential for the
2 production of organic foods for vegetarian
3 diets.

4 U.S. organic agriculture policy
5 should not be dictated by foreign policy.

6 Complete equivalency does not
7 exist between the various North American and
8 European based organic regulations and will
9 most likely stay that way unless the U.S.
10 system is willing to capitulate and allow the
11 infiltration of organic products from Canada
12 and Europe where the use of antibiotics in
13 livestock, and synthetic fertilizers and
14 crops, materials that the U.S. organics
15 prohibit.

16 The NOP should establish policies
17 that support domestic organic standards
18 rather than be dictated by, and even if it's
19 to harmonize with the policies of foreign
20 countries.

21 It is important to note that there
22 are many organic farming inputs allowed in

1 Europe but prohibited in the United States,
2 which hinders international trade of organic
3 products.

4 Lastly, with all deference, the
5 NOSB decision on sodium nitrate was not well
6 made. The decision making process to remove
7 sodium nitrate from the list of approved
8 inputs for organic agriculture production was
9 the result of confusion, the failure to
10 consider the information made available to it
11 and outside influence.

12 The transcript of the meeting
13 records demonstrates that decision was not
14 well made.

15 I urge the NOP to rethink its
16 support for the NOSB's recommendation on
17 sodium nitrate, and I am going to take an
18 investigation into this matter.

19 Apply good science and clear
20 judgment to the decision of sodium nitrate
21 use in organic agriculture.

22 I appreciate the opportunity to

1 discuss these issues with you today and I
2 thank you very much.

3 MR. LIPSON: Thank you, sir. Any
4 questions from anyone? All right. Next, Mr.
5 Ogden, Shepherd. Welcome.

6 MR. OGDEN: My name is Shepherd
7 Ogden, and I am the Agricultural Development
8 Officer for Jefferson County, West Virginia,
9 which is about 75 miles up the Potomac River
10 from here.

11 We're the only county in West
12 Virginia to have an Agricultural Development
13 Office and we're also the only county in West
14 Virginia to be part of the Washington
15 Metropolitan Statistical District.

16 That brings some particular
17 benefits, opportunities and challenges to the
18 agriculture of our county and the northern
19 Shenandoah Valley generally.

20 My comments today are not
21 specifically directed to organic, though I
22 was an organic vegetable farmer for many

1 years and owned a seed company that imported
2 certified organic seed from Europe.

3 And I do have opinions on many of
4 these matters, but I'm sure you've heard many
5 of those positions already.

6 So I would like to speak instead
7 to something I can speak to personally, being
8 62 years old, and that is the average age of
9 the farmer in this country all of which we're
10 familiar with the statistics there.

11 And our county is a classic
12 example of that where all the guys I went to
13 high school with who are now farmers are
14 retiring.

15 And the nearness to markets and
16 metropolitan growth stresses are affecting us
17 greatly because it raises the price of land.

18 It also means that the ability of
19 the younger people who grew up on the farms,
20 to get to the city and have jobs, puts a
21 double stress on our ability to maintain
22 regional food security in an area where, when

1 energy costs go up we're going to want to
2 have a lot more productive capacity to avoid
3 having to ship so much food from distant
4 areas.

5 Commodity grains not so much a
6 problem, but fresh produce a huge problem.
7 My county, when I was a child, had 4,000
8 acres of orchards. It now has 1,000 acres of
9 orchards.

10 What we need, I think, from the
11 USDA is a continued support for beginning
12 farmer training both of young people -- I
13 teach sustainable agriculture at Shepherd
14 University myself and have done so at other
15 colleges, that's one root.

16 We've gotten a number of good
17 academic programs in organic agriculture
18 going around this country and we're starting
19 to turn out high quality graduates.

20 But I've recently had brought to
21 my attention by people in my area, and in my
22 case people like I've known since high

1 school, returning veterans who want to help
2 younger veterans, many of whom are from rural
3 areas, many of whom have an agricultural
4 background, all of whom are obviously
5 trainable since they've been trained in the
6 military and many of whom would benefit from,
7 especially if they have any kind of PTSD
8 symptoms, that sort of thing, will benefit
9 from training programs that will help them
10 get into agriculture.

11 I would of course personally
12 prefer small scale agriculture and a
13 diversified regional agriculture, but I don't
14 think that's a huge issue.

15 But one thing we need to do is
16 make sure that there is funding there to both
17 benefit these veterans who are coming back,
18 but also benefit us by creating a whole new
19 generation of farmers in their late 20s and
20 early 30s.

21 The second part that we need in an
22 area like ours, and I think our areas may

1 have this set of characteristics more
2 extremely than others but its characteristic
3 all around the country, and that is the cost
4 of land to get into farming.

5 And so I think we also need to
6 keep up the funding for farmland
7 preservation. I actually share my office
8 with the administrator of the Jefferson
9 County Farmland Protection Board.

10 Her funding comes entirely from
11 the transfer tax on real estate, and we all
12 know how much real estate is transferring
13 these days.

14 That means that coupled with the
15 lowering price of land due to the real estate
16 glut and a lack of transfer taxes, we, at the
17 moment have \$500,000 worth of USDA money that
18 we can't match.

19 I would personally like to see the
20 level of match from the USDA side go up for
21 awhile so that we could manage to get more
22 property into these programs while the prices

1 are low.

2 And that would be a huge help. I
3 see her every day working very hard to get
4 this land in while we have a low price and
5 can make it much more efficiently preserved,
6 so that when we have this new generation of
7 farmers they have land to go to after we've
8 trained them.

9 So I would like to see continued
10 and increased support for farmer training and
11 for farmland preservation. Thank you.

12 MR. LIPSON: Great, thank you.
13 Any questions, anybody? Okay, Ms. Lovera?
14 Welcome.

15 MS. LOVERA: Hi, my name is Patty
16 Lovera, and I'm here on behalf of Food &
17 Water Watch. So I was going to talk just
18 very quickly about a couple of broad issues
19 that we're thinking a lot about that impact
20 organic.

21 The first one may not be super
22 obvious, but our water team at Food & Water

1 Watch is getting very, very involved in
2 several parts of the country on the issue of
3 hydraulic fracturing for natural gas, the
4 high volume hydraulic fracturing. People
5 call it fracking.

6 This is happening in certain parts
7 of the country where this industry is just
8 exploding. It's rural areas and it has
9 major, major impacts on water.

10 And we think if it hasn't become
11 an issue for organic farmers yet, it's
12 probably unfortunately a matter of time until
13 it does.

14 So I just wanted to raise that
15 issue as a bigger topic that we're hearing a
16 lot about. It's not necessarily an NOSB
17 problem or an NOP problem, but I think it's
18 something that this community is going to
19 have to talk about in places like
20 Pennsylvania, New York, Ohio, where the
21 technology really is exploding.

22 And it may not even be the choice

1 of the particular organic farmer but the
2 choices their neighbors make to drill or not
3 to drill that could really impact their
4 water.

5 And unfortunately, we think we're
6 probably going to end up having to have a
7 conversation about what do organic farmers do
8 if their water supply has been impacted by
9 this.

10 So I just really wanted to kind of
11 tee that up as something we're starting to
12 think about, because our phone is ringing off
13 the hook from certain parts of the country
14 with people who are worried about this
15 technology, you know, really coming into
16 their rural area.

17 Another kind of broad stroke issue
18 I wanted to tee up that is not new to you all
19 is the food safety conversation. And when it
20 comes to organic I think there's two specific
21 thoughts I would like to relay.

22 One I know I've talked to folks

1 about, which is the egg safety rule coming
2 out of FDA and how the Salmonella rule fits
3 with organic standards.

4 We've talked about that some of us
5 here, there is confusion, so I would just
6 really urge the program to stay in touch with
7 FDA and try to figure that out.

8 We've tried to talk to them about
9 it. We don't want to see, you know, a food
10 safety standard become an obstacle to really
11 figuring out the animal welfare issues and
12 outdoor access issues that consumers are so
13 interested in when they buy organic.

14 And then the other piece of food
15 safety is that as the FDA Food Safety
16 Modernization Act is implemented and produce
17 standards are written, we've had a lot of
18 conversations with FDA about how produce
19 standards will be developed and what they'll
20 look like.

21 And we're hearing a lot from them,
22 which we think is encouraging, that the

1 standards will be about practices as opposed
2 to being commodity specific.

3 But I think that then makes an
4 opportunity for the organic program to talk
5 about how organic practices are different.
6 And I don't think that FDA necessarily
7 understands that.

8 So I think that there's a role
9 now, soon, to talk about FDA about where does
10 compost fit in and what are the rules for
11 compost, what are the rules for manure, how
12 it's handled differently?

13 It's not just thrown about raw in
14 organic production because there are
15 misconceptions about that.

16 So as they work on practice
17 specific standards I think, you know, we have
18 to talk to them about what organic standards
19 really are as opposed to maybe their
20 perceptions about it.

21 And then finally, it wouldn't be a
22 comment from Food & Water Watch if we didn't

1 talk about aquaculture. So first, we
2 continue to get requests from consumers who
3 are confused about imported fish that's
4 labeled as organic.

5 So I just wanted to bring that up
6 again to really urge the program to think
7 about that. There's been at least one
8 supermarket chain in the Northeast that's
9 openly talking about how they know there's
10 not a standard, but they're selling European
11 organic fish here and that causes a lot of
12 confusion for consumers.

13 And then on the depending
14 standards, you know, here in the U.S.
15 program, you know, we've said this before,
16 we'll keep saying it.

17 Lots of other groups will say it
18 too. Very, very concerned about the
19 allowance of open net pen production because
20 of those environmental impacts and very, very
21 concerned about the use of wild fish as feed,
22 because we don't think that's compatible with

1 the line that we've drawn for feed for other
2 types of livestock.

3 So we would really urge a
4 reconsideration of that approach when you get
5 to the point of writing a standard for
6 aquaculture.

7 That's it.

8 MR. LIPSON: Yes, I'm trying to
9 frame a question. Can you talk a little bit
10 more about that consumer confusion with
11 respect to marketing claims on imported fish
12 labeled as organic?

13 MS. LOVERA: Right, so we've had I
14 don't know how many, but periodically we do
15 get calls or emails from people are saying, I
16 thought there wasn't a standard for organic
17 fish.

18 And so the chain in question this
19 year was Wegman's. They started selling, you
20 know, organic salmon. It's organic under an
21 EU standard.

22 We don't have one. And your

1 dedicated organic consumers have been trained
2 and we've tried to train them to look for the
3 green and white USDA Organic.

4 And they're saying, it's not
5 there. I thought that's what the symbol was.
6 And so they're just confused about how that's
7 allowed.

8 They thought that if it was being
9 sold as organic here it was under a U.S.
10 standard, and there isn't one. And so it's
11 very hard for us to explain that and just say
12 what the standard is.

13 And, you know, and the folks who
14 contact us also have been following our
15 issues and have the same concerns that we
16 have about fish farms and things like that.

17 And so they're like, well, you
18 know, we thought that the European standard
19 wasn't as good, which in some ways it isn't.

20 So there's just a lot of confusion
21 about what to look for, and it doesn't have
22 that, you know, that USDA seal behind it so

1 they're just not sure how that works, because
2 they thought that was what they were supposed
3 to look for.

4 MR. LIPSON: Okay, thank you.

5 MS. LOVERA: Thanks.

6 MR. LIPSON: Mr. Hanson? Is there
7 anybody else in the room who isn't registered
8 yet to make comments that is wishing to?
9 Your last chance almost.

10 Jaydee, we can get somebody to
11 help pass things out if you really want that
12 to happen.

13 (Off microphone comments.)

14 MR. HANSON: Good afternoon. I
15 apologize for my deeper than normal voice. I
16 have been going through the normal fall colds
17 that are going around town.

18 Even with a raspy voice I
19 appreciate the chance to talk with the
20 National Organic Program about what I think
21 is a way to implement the National Organic
22 Standards Board March 2007 recommendation on

1 excluding farm animal clones and their
2 offspring from the organic market.

3 I have a lifelong interest in
4 cattle breeding. Took my first course in
5 cattle breeding when I was 14. One of my
6 cousins heads the Certified Angus Beef
7 program. One of my uncles on the other side
8 was the Secretary of Agriculture in Idaho.

9 So I'm presenting to you in the
10 second part of this, a table of some of the
11 cattle breeding associations that have
12 already adopted policies requiring
13 information on whether an animal is a clone
14 or descended from a clone.

15 Now pig registries and goat
16 registries are also requiring, in some cases,
17 cloning status. But given that most of the
18 clone farm animals are cattle, I think the
19 chart I'm giving you and the company index
20 including the text of cloning registry
21 requirements for many of the breeds is a good
22 example of how tracking of clones and their

1 offspring are already being tracked by the
2 breeding associations.

3 Moreover, all of the beef breeds
4 with large numbers of animals going to
5 market, Angus, Herefords, Texas Longhorn,
6 already have requirements for tracking clones
7 and their progeny.

8 There's a few on my list that says
9 maybe. That's only because I couldn't find
10 it on their website, and their staff hasn't
11 got back to me. So I don't know whether they
12 do or don't.

13 But in the last two years, many of
14 the breeding associations have adopted
15 standards. You know, it's not hard. Almost
16 all of them were tracking embryo transfer.

17 From their point of view this is
18 another kind of embryo transfer. There's
19 really good reasons to track clones and their
20 offspring.

21 Almost every breed has four or
22 five genetic diseases they're trying to breed

1 out. If you don't track the clones with that
2 as well as everything else, you can't do it.

3 All four of the major dairy
4 breeds, Jersey, Holstein, Guernsey and Brown
5 Swiss have similar requirements.

6 Many organic farmers already keep
7 pedigrees on their animals, and for the ones
8 that do not a requirement that they verify
9 the pedigree of an animal is no more
10 complicated than other requirements that they
11 must implement to have their products
12 certified as organic.

13 They know how to jump through
14 hoops and this is actually one of the easier
15 ones. It will be more and more important
16 that the U.S. National Organic Program
17 implement their recommendations of the NOSB
18 on clones and their progeny.

19 The Canadian Organic Standard was
20 amended to exclude clones and their offspring
21 from organic in 2008.

22 The Soil Association of the U.K.

1 which administers organic standards for the
2 U.K. has a campaign to get Europe to ban
3 clones and their offspring altogether.

4 Indeed, the new European rules on
5 novel foods were derailed this year due to a
6 conflict between the European Parliament that
7 doesn't want to allow clones on the market
8 and the European Commission, especially their
9 equivalent of the FDA, the EFSA, on whether
10 clones and their offspring should be
11 permitted in the EU marketplace.

12 It's not in my text but I'll ask
13 anyway, in the 2008 Farm Bill there was a
14 request asking USDA to do a study on the
15 effects of cloning on the economics of
16 farming.

17 I'm a Linked In friend of Bruce
18 Knight, so I emailed him this last week and
19 said, Bruce, did you guys ever do that? And
20 he said, nope, maybe the new team is but we
21 never got it done.

22 So that's a study that will

1 actually look at more than just organic, but
2 look at the effect on all livestock
3 production with clones.

4 Well, I think this is the simplest
5 way to implement the recommendation of the
6 NOSB. People know how to keep registries.
7 You know, it's not new for the industry.

8 They're doing it for embryo
9 transfers already. They do DNA testing
10 already for these diseases. So this is an
11 easy way for the National Organic Program to
12 implement something that people know how to
13 do.

14 And, you know, I would urge you to
15 actually look at some of their
16 recommendations.

17 One is actually quite interesting
18 from the USDA, I included that for Holsteins
19 there, because what USDA researchers are
20 finding is there are actually fewer clones
21 being registered.

22 And one of my colleagues said,

1 well, does that mean they're just hiding it?

2 I don't think it means they're hiding it. I
3 think what it means is the economics of this
4 haven't worked out as well as even some of
5 the early adopters thought they would.

6 I'll stop there, but you've got,
7 you know, lots of information on every one of
8 those that say yes. And on the four that say
9 maybe, I'll get that.

10 You know, and this doesn't cover
11 every breed. There are 260 breeds in the
12 world, but these cover all of the major
13 breeds in the U.S. Thank you.

14 MR. LIPSON: Thanks, Jaydee. Any
15 questions or anybody have a quick answer on
16 that Farm Bill implementation question? I do
17 not have knowledge of that. All right,
18 thanks, Jaydee.

19 MR. HANSON: Yes, I'll send you
20 the report language about it.

21 MR. LIPSON: Great.

22 MR. HANSON: Okay, thank you.

1 MR. LIPSON: Okay, Colin O'Neil?

2 MR. O'NEIL: Hello, my name is
3 Colin O'Neil. I'm the Regulatory Policy
4 Analyst with the Center for Food Safety. And
5 first and foremost, we'd like to thank the
6 USDA for convening this listening session
7 today.

8 CFS believes that the ability to
9 strictly adhere to organic agriculture and
10 food production must drive the types of
11 certified organic products that are made
12 available to consumers in the marketplace.

13 And the desire to create and
14 market a product that is certified organic
15 must not compel the contortion or dilution of
16 existing organic standards. This blows our
17 litmus test for ensuring organic integrity.

18 As the government program charged
19 with ensuring organic integrity, we
20 understand the difficulties in balancing
21 diverse stakeholder needs in your decision
22 making process, and that issues affecting

1 organic integrity may at times be out of your
2 direct control.

3 Still we believe that the NOP
4 could be more proactive in its efforts to
5 protect organic integrity with respect of
6 three critical issues.

7 One, preventing GE contamination
8 of organic crops and seed. Two, directing
9 government funded research on organic. And
10 three, prohibiting organic aquaculture in
11 open ocean net pens.

12 As rightly stated in the NOP April
13 15th memo on GMOs and organic, since organic
14 certification is a process based standard,
15 presence of detectable GMO residues alone
16 does not necessarily constitute a violation
17 of the regulation.

18 The NOP relies on organic
19 certifiers and producers to determine
20 preventative practices that most effectively
21 avoid contact with GMOs on an organic
22 operation.

1 Although technically correct, this
2 narrow response to the growing threat of GE
3 contamination of organic is inadequate and
4 does little to retain public confidence in
5 the organic label.

6 Nearly 100 people expressed their
7 concerns about contamination of organic to
8 the NOSB in April, even though the issue was
9 not the Board's agenda.

10 As these unsolicited comments
11 suggest, the organic community expects the
12 NOP to do more about contamination or risk of
13 decreasing people confidence in its ability
14 to ensure organic integrity.

15 To that end, CFS urges the NOP to
16 enter into a memorandum of understanding with
17 APHIS of shared responsibility for
18 contamination prevention of organic.

19 The MOU would set the stage for
20 mandating GE technology users to share
21 responsibility for preventing contamination
22 along with the organic farmers who are

1 already doing so by providing training and
2 education on contamination practice
3 standards.

4 As an advocate for organic
5 integrity, CFS finds it discouraging to see
6 the NOP repeatedly extend approvals for
7 substances on the national list instead of
8 sunsetting them, because of there is a lack
9 of available alternatives.

10 Antibiotic use in organic apple
11 and pear production provides a case in point.
12 After being on the national list for more
13 than ten years the NOP again extended their
14 use until 2014.

15 Unfortunately, we're already
16 hearing from organic apple and pear growers
17 that they are not likely to meet this
18 deadline due to the absence of viable
19 alternatives.

20 Consumers view organic as the
21 healthy alternative for many high processed
22 foods on the market. When they decide to

1 purchase organic foods they do not expect
2 them to be grown with antibiotics, much like
3 they do not expect them to be irradiated or
4 genetically engineered.

5 The continued allowance of
6 antibiotics as well as the long list of other
7 synthetics allowed in organics is another
8 area where we believe the NOP could do more
9 to ensure organic integrity.

10 A whole systems approach to
11 researching and troubleshooting problems in
12 organic production systems as well as finding
13 solutions that are not mere input
14 substitutions is needed to combat the trend
15 toward expansion of the national list.

16 Further, we urge the NOP to
17 initiate a collaborative process whereby it
18 communicates the program's pressing research
19 needs to the Research Education and Economics
20 mission area staff on a regular basis.

21 This way, government funded
22 organic research would be directed toward

1 solving entrenched issues within the NOP and
2 factoring into the request for applications
3 development process for both OREI and the
4 Organic Transition Program.

5 It would also facilitate the
6 sunseting of materials on the national list
7 and thereby improve organic integrity.

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

14 Therefore, we do not support the
15 NOSB's recommendation for the NOP to draft
16 organic carnivorous fish farming standards.

17 The recommendation to allow wild
18 caught fish, fish meal and fish oil to be
19 used in carnivorous organic aquaculture
20 contravenes the spirit and intent of OFPA,
21 which requires all certified organic species
22 be fed a 100 percent organic diet.

1 If allowed, such practices would
2 increase pressure on already over-exploited
3 or recovering fisheries that form the base of
4 aquatic food webs and undermine OFPA's
5 biological diversity conservation
6 requirements.

7 CFS urges the NOP to take a
8 proactive stance on organic aquaculture that
9 ensures organic integrity by rejecting the
10 NOSB's recommendations.

11 Instead, we urge the program to
12 direct NOSB to go back to the drawing board
13 and develop recommendations for inland
14 organic herbivorous aquaculture grown in
15 highly controlled systems where inputs,
16 outputs and fish health and welfare can be
17 closely monitored and regulated. Thank you.

18 MR. LIPSON: Okay, any questions?
19 Mary, have one?

20 MS. PEET: Okay. Well, I'm
21 responding, I guess, on the NIFA questions.
22 We do certainly fund and consider requests on

1 -- well, I guess not really input
2 substitution but developing alternatives.

3 But, you know, of course we have
4 limited budgets and lots of other research
5 priorities and, you know, again it's a panel
6 decision. And, you know, they like to see
7 systems research as well.

8 But certainly it is something that
9 we consider in the NIFA program and we do try
10 to help out there as much as we can. Again,
11 sort of within the limits of the funding
12 constraints.

13 The other thing we're trying to do
14 on the GMO issue is to try to breed in, just
15 work on breeding systems that will be
16 obligate in breeding, prevent cross
17 contamination.

18 But again that's a long term and
19 not certainly a 100 percent probability and
20 it would also have to be developed for each
21 crop separately.

22 But, you know, good comments and

1 we'll certainly consider them, and you can
2 also submit them directly to the RFA.
3 There's a process for RFA input.

4 MR. O'NEIL: Okay. Can I comment
5 real briefly? I think, you know, one of the
6 issues that I try to hit on, and I'd be happy
7 to extrapolate further at a later date, is
8 that the Center believes that at this point
9 it'd be best to streamline as best as
10 possible by integrating organic within the
11 current systems rather than having individual
12 programs come from the outside.

13 And on the contamination
14 prevention, operating on a preventative basis
15 rather than after the fact, after
16 contamination occurs seems to be benefit and
17 would probably cost a lot less money.

18 But certainly that would be
19 through the education and those types of
20 preventative methods. Thank you.

21 MS. PEET: Well, if they can't,
22 they cross-pollinated that would prevent it.

1 But obviously it's better for the pollen not
2 to get there in the first place. That's sort
3 of beyond what we fund in NIFA.

4 MR. O'NEIL: Yes, that's certainly
5 true.

6 MS. PEET: But thank you.

7 MR. O'NEIL: Yes, thank you.

8 MR. LIPSON: Thanks, Colin.
9 Thanks, Mary. All right, well unless there's
10 anybody else who still wants to make a
11 comment, I will officially adjourn our
12 listening session.

13 Thank you all very, very much for
14 being here and participating. Thanks very
15 much to our listeners for the whole day who
16 have been great, and I hope have gotten some
17 good information.

18 And thank you all very much again
19 and see you next time. All right.

20 (Whereupon, the foregoing matter
21 went off the record at 3:23 p.m.)

22

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