

UNITED STATES DEPARTMENT OF AGRICULTURE

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NATIONAL ORGANIC STANDARDS BOARD MEETING

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Tuesday, May 5, 2009

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The National Organic Standards Board met in the Franklin and Adams Rooms in the Washington Plaza Hotel, 10 Thomas Circle, Washington, D.C., at 8:00 a.m., Jeff Moyer, Chairman, presiding.

PRESENT:

JEFF MOYER, Chairman
DAN GIACOMINI, Vice Chairman
JULIE WEISMAN, Secretary
KATRINA HEINZE, Member
GERRY DAVIS, Member
TINA ELLOR, Member
BARRY FLAMM, Member

TRACY MIEDEMA, Member
JOE SMILLIE, Member
JENNIFER HALL, Member
STEVE DEMURI, Member
BEA JAMES, Member
KEVIN ENGELBERT, Member
HUE KARREMAN, Member

STAFF PRESENT:

VALERIE FRANCES, Staff
BARBARA ROBINSON, Staff
RICHARD MATTHEWS, Staff
DEMARIS WILSON, Staff

ROBERT POOLER, Staff

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Adjourn

1 our recommendations will also be done by team
2 members. And Rigo has always been a valuable
3 member, and we really miss him.

4 In any case, the first
5 recommendation that we have involves a new
6 addition to the New Member Guide, and this was
7 sort of a pet thing that I thought of when I
8 came on the Board. I was overwhelmed by the
9 number of acronyms, and wanted, for my own
10 personal use, to make a glossary. This ended
11 up on our work plan, and thanks to Tom
12 Hutchinson of OTA, he gave me a great start.
13 He sent a list that he had used to help
14 himself. So, in any case, this first
15 recommendation is a list of acronyms.

16 The recommendation states that
17 this could be amended at any time without
18 going back for a vote. It's a working tool,
19 and already received several very helpful
20 comments from the public on name changes, and
21 organizations, additions, and that, which will
22 be incorporated before posting. So, that's

1 the first recommendation.

2 The second one, Hue will present.

3 MEMBER KARREMAN: Time for me to
4 present. All right. Thanks, Barry.

5 This is another addition to the
6 New Member Support Guide, and I think it will
7 be really good for the new five people coming
8 on next year, as the Board is getting on board
9 to the bulletin board, where documents can be
10 worked on in real time, people can add things
11 at any point, and not get lost on updates and
12 emails alone. And, basically, that's it. And
13 it's recommended that this particular section,
14 which, in our notes, shows basic computer
15 screen shots of how to jump around within it.
16 It's the NOSB e-Bulletin Board, titled, and
17 this section will be added to the New Member
18 Guide in Chapter 5, "Suggested Best
19 Practices", immediately after Section E,
20 "Tracking Changes in Word Documents." And
21 then it will be titled, "List of Common
22 Technical Sources Used by NOSB Members." It

1 will become Section G.

2 MEMBER FLAMM: Thank you, Hue.

3 The next section is additions,
4 changes to the Procedure and Policy Manual.

5 First up is Priority Petition Inclusion in New
6 Member Guide, and Steve has worked on that,
7 and will present it to the Board.

8 MEMBER DeMURI: Thank you, Barry.

9 The original document that most of
10 you saw has been modified based on some very
11 good comments we got from the public, both
12 written and orally yesterday, so we met as a
13 Committee this morning and talked about those.
14 Valerie, do you have the revised one? Yes.
15 Okay.

16 It's kind of hard to tell, but
17 everything that's in red is a revision from
18 the previous version. The comments revolved
19 around two main themes. The first one was
20 that there could be a potential for
21 petitioners to resubmit petitions, to add or
22 remove substances to or from the list without

1 new substantive information. So, that was a
2 very good comment that several people made,
3 and we wanted to try to tighten that up, so
4 that we wouldn't have people just continually
5 repetitioning things over, and over, and over
6 again, without some kind of new information
7 coming to the front. So, we did tighten up
8 some of the sections of the guideline to keep
9 that from happening, hopefully.

10 The second comments, the main
11 theme revolved around old petitions that have
12 been into the black hole of the NOP/NOSB for
13 a number of years now. There were some folks
14 that thought maybe we should include those
15 into this guideline.

16 What we decided to do as a
17 Committee was to leave that as a separate
18 issue that the NOSB and NOP are addressing.
19 We heard comments yesterday from the program
20 that they were going to work with Science and
21 Technology to try to address those. I think
22 Valerie is going to address that in her update

1 this morning. So, we felt that was really a
2 separate issue that we did not include in this
3 document.

4 MEMBER FLAMM: Thanks, Steve.

5 MEMBER DeMURI: So, one more
6 thing.

7 MEMBER FLAMM: Oh.

8 MEMBER DeMURI: Trying to cut me
9 off there. One thing that's important to
10 remember is that this is just a guideline, so
11 if something comes up that's out of the
12 ordinary, the Committee Chairs, working with
13 the Materials Committee and NOP, can make
14 judgment calls as they need to for unusual
15 circumstances, so this is only a guideline.
16 It's not set in stone. It's not going to take
17 an act of Congress to change, and it could be
18 modified as we go forward, as well.

19 MEMBER FLAMM: Thanks, Steve.

20 CHAIRMAN MOYER: Mr. Chairman, do
21 you want your Board members that have
22 questions or comments to present them as each

1 person presents their particular item, or
2 would you prefer they wait until the end and
3 ask questions?

4 MEMBER FLAMM: Maybe in this case
5 it would be well to take questions now,
6 because the petition did have a number of
7 issues. So, does any Board member have
8 questions?

9 CHAIRMAN MOYER: I have one
10 question on the previous presentation.

11 MEMBER FLAMM: Oh, okay.

12 CHAIRMAN MOYER: So, I guess I'll
13 ask that now. On the e-Bulletin Board, Hue,
14 I just was wondering if we shouldn't - I'm not
15 sure how to put it in there - but make a
16 statement that folks should make sure they pay
17 attention to emails coming from the e-Bulletin
18 Board Administrator about changing your
19 password, because it seems to be an issue
20 where even with you, people neglect those
21 emails, and suddenly you can't gain access to
22 the site. Just a question.

1 MEMBER KARREMAN: I think that
2 would be fine, and I have tried a couple of
3 times earlier. But, I agree with you that
4 that should be put in there. Joe?

5 MEMBER SMILLIE: When I go off the
6 Board, you'll probably have full compliance,
7 because changing passwords, maybe I'm getting
8 old, but I can't remember what the passwords
9 were. And I just finally said goodbye. It's
10 like just too much for me to keep changing my
11 password. And they don't let you use an old
12 one, you can't like rotate, so it's like -- I
13 said goodbye, so I apologize.

14 MEMBER SMILLIE: No apology
15 necessary, Joe. I'm in the same boat. And it
16 is hard to keep thinking of new passwords. I
17 have them like taped to my wall, and I draw a
18 line through them so I don't use them over
19 again.

20 MEMBER FLAMM: I think it was
21 Katrina that gave me a tip that works. I
22 don't -- it's just 1, 2, 3 and each, but I

1 keep the same password and go to the next
2 number. Any other questions?

3 MEMBER JAMES: Maybe what we
4 should do is make sure that it's clear that
5 you want to continue to do your dialogue
6 through email, because that seems to be the
7 primary way that we're communicating right
8 now. And that the e-Bulletin does have the
9 passwords that need to be updated frequently,
10 and it's not a substitute for making sure that
11 you look at email, as well. So, we can
12 finesse that wordage.

13 CHAIRMAN MOYER: Yes. I didn't
14 want to distract everybody from what we were
15 doing here with Steve. It's just, it's
16 something that comes up. And, you're right,
17 we do most of our current business by email,
18 and then post documents onto the Bulletin
19 Board so other Committees can see what we're
20 working on. That's how we've been using it,
21 anyway. But without a password, it's really
22 useless. Thank you.

1 MEMBER FLAMM: Part of this
2 material I think Hue already covered, but re-
3 emphasize, this was material developed by
4 Rigo, and it was used in our training session,
5 so it's pretty much moving it over to the New
6 Member Guide. And it doesn't create any
7 policy or things like that. Yes, Dan?

8 MEMBER GIACOMINI: Yes. Just on
9 the petition guideline, I think it is only a
10 guideline, and it's for our sort of internal
11 paperwork. But I think it's good to clarify
12 that in setting up -- and this priority --
13 we're really just formalizing the priority
14 list that we've sort of always had. But I
15 think it's good to clarify that simply by
16 having this priority list, everything still
17 moves forward. Nothing becomes shelved
18 because something has a higher priority.

19 We may try to take faster action
20 on it, but if it is bogged down, for whatever
21 reason, technical reviews, confusion issues,
22 whatever, that action of a bogging down of a

1 higher priority doesn't derail anything else.
2 Everything is still moving forward. And
3 things from number three may come up before
4 things from number one. It's just we try to
5 push harder on them, but everything still
6 moves.

7 MEMBER FLAMM: That's correct.

8 And as Steve pointed out, in the final
9 analysis it's a judgment of the Committee and
10 the Board on where things go. But, as Hue
11 pointed out, what we're trying to do, some of
12 these instructions were written some time ago,
13 especially priority of -- to delist, but it
14 never found its way into the Policy and
15 Procedures Manual, so a lot of people either
16 forgot, or didn't know about it. So, we're
17 trying to put this together as a reference
18 point, as a guide, and not anything to
19 hamstring, because there has to be -- the
20 Committee will use judgment in determining it.

21 Okay. Moving on, the next item
22 for the revision of the Policy and Procedure

1 Manual. We've been systematically going
2 through the Policy and Procedure Manual trying
3 to update it, and bring things forward,
4 decisions that are already made, or practices
5 in place that weren't reflected in the manual.

6 In Section 3, which deals with
7 duties of an Executive Director, and of the
8 Officers, and also meetings, we did some
9 updating. There's a more complete description
10 of the role of the Executive Director, and
11 it's trying to reflect what the Executive
12 Director does at this time. The Executive
13 Committee duties were updated and changed, and
14 the wording was replaced as follows. "Only
15 the Full Board" - and this is, I think, a
16 clarification, and I believe better stated -
17 "Only the Full Board may make decisive action
18 on guidance and other policy recommendation
19 from the Committees, including the status of
20 materials proposed for addition or deletion on
21 the National List."

22 That replaces wording that said,

1 "Except, the Executive Committee shall not
2 take any action on a recommendation to the
3 Secretary, including status of materials, and
4 on the National List." I think this new
5 wording is clear.

6 It also clearly assigns the
7 Executive Committee to sort of oversee the
8 proposed work plans of the Committee, and the
9 language is that, "The Executive Committee
10 will provide guidance and feedback to
11 Committees on their proposed work plan." And
12 we took that out of the Policy Committee
13 duties, which the Policy Committee wasn't
14 doing, and we thought more appropriately was
15 a role of the Executive Committee.

16 The language for Secretary --
17 actually, this was agreed to at and passed at
18 the last meeting, those duties, you can see up
19 there, which involved technical corrections.
20 The Secretary sort of tracks that, makes sure
21 that what decisions of the Board and what's
22 published in the Federal Register is the same.

1 And if there isn't, to alert the Board for
2 action to be taken. But this was passed at
3 the last meeting. We're just moving that up
4 into the Policy and Procedure Manual.

5 Then, finally, the meetings
6 description was much out of date, unclear in
7 terms of FACA requirement, and also when the
8 statement was that the Board determines on its
9 own where the next meeting will be, and sets
10 the schedule. And that hasn't been happening,
11 so this language clarifies the FACA
12 responsibility, and public notification. It
13 also clarifies what does actually come under
14 FACA notification; like we can have get-
15 togethers, certain kinds of get-togethers that
16 are outside the requirements of FACA.

17 And, then scheduling the Board
18 meeting, this has been reworded to say, "The
19 date and location of periodic full in-person
20 Board meetings normally twice a year will, to
21 the extent possible, be set by consensus of
22 the Board, and in consultation with NOP."

1 So, that's the changes proposed
2 for Section 3. Any questions on this? Yes,
3 Tracy.

4 MEMBER MIEDEMA: I have a question
5 back under the Executive Director duties
6 section. It talks about participation of the
7 Executive Director, and that's never been a
8 serious issue, because our Executive Director
9 is immensely gracious, and very good at her
10 job. But there's the risk of sort of a
11 privileged member of the public being a 16th
12 Board Member because of the level of
13 participation of the Executive Director. So,
14 we don't have anything in here that sort of
15 says what that person's role is not. And
16 that's a little bit of a concern, that we
17 don't say they are not to influence the Board
18 in X, Y, or Z. And maybe that's not
19 necessary, but the only word in here that does
20 give me pause is the word "participating" in
21 officer calls, which implies a real, I guess,
22 participation. And I think that we might be

1 able to use a word that better -- facilitates,
2 for instance, right there to be a little more
3 clear about what the role is.

4 MEMBER FLAMM: Thank you for those
5 comments, Tracy. And we'll consider that.
6 So, the duties reflects pretty much what's
7 happening now, but I understand the point
8 you're making. Thank you.

9 If there's no more questions, Bea,
10 would you address Section 4?

11 MEMBER JAMES: As part of a
12 systematic review, we're also just trying to
13 make our way through the Policy and Procedure
14 Manual, as Barry mentioned, and update it.
15 So, Section 4 is a description of the Standing
16 Committee duties, for the most part. It's
17 very broad, and we updated that for each
18 Committee to more clearly reflect what those
19 Committees are doing. And I do have, based on
20 some public comment, and also some comments
21 from the Board members, some friendly
22 amendments that I'd like to be able to make on

1 this recommendation.

2 Under the first Committee
3 certification accreditation, it was suggested,
4 because we had it in some of the other
5 Committees, and we missed it on a few, under
6 "The Board is to provide guidance,
7 clarification, or proposed standards of
8 certification, accreditation, and compliance
9 sections of the Organic Regulation." And then
10 after that it should say, "and OFPA." And then
11 on the Crops Committee, after 7 CFR Part 205,
12 we'd like to also add, "and OFPA."

13 And then we had a public comment
14 that we actually missed removing technical
15 reviews out of the Crops Committee. And we
16 had a public comment that reminded us that
17 technical reviews is not used in OFPA, the
18 Final Rule. And it should be deleted, so that
19 we have consistent language in our
20 description, which is Technical Advisory Panel
21 reports. So, we'd like to just leave it at
22 Technical Advisory Panel reports, and take out

1 under Crops, "technical reviews." That's the
2 only place we need to take it out.

3 MS. FRANCES: I just have a
4 question, why wouldn't you want an additional
5 form of information included in the
6 Committee's description?

7 MEMBER JAMES: Is there an issue
8 with it not being the language that's used in
9 OFPA, or the Final Rule?

10 MS. FRANCES: This is your policy
11 manual.

12 MEMBER JAMES: I'll defer to Barry
13 on a final decision for that.

14 MEMBER FLAMM: Well, we're trying
15 to be responsive to the public comments, and
16 I think since it was only the Crops Committee
17 that this is an issue, and we didn't put it in
18 the other two, that we were being
19 inconsistent. So, we should either put it in
20 all or just drop it. And it was our decision
21 this morning in the Committee to go ahead and
22 drop that in response to concerns expressed,

1 which doesn't change the content. Jeff?

2 CHAIRMAN MOYER: Barry, maybe we
3 could get a comment from Barbara or the
4 Program, because I think technical reviews is
5 a term that you folks started to use, and
6 presented to us. Instead of TAPS, we started
7 calling them TRs. Is that -- and that
8 language for TRs, Technical Reviews, isn't in
9 the rule. Is there a reason why you've chosen
10 that language? Should we include that in
11 here? What's your feeling?

12 MR. MATTHEWS: To tell you the
13 truth, I don't know. And I guess the question
14 that I would pose is, is there a difference
15 between technical review, and Technical
16 Advisory Panel?

17 CHAIRMAN MOYER: I'm not sure if
18 there is, or isn't. But I know -- I just know
19 from conversations we've had, technical
20 reviews is language that you folks starting
21 using to the Board, and we just adopted it,
22 and started using it in our normal protocols.

1 MR. MATTHEWS: If there's no
2 difference, I would suggest going ahead and
3 removing the language, as suggested.

4 MEMBER KARREMAN: I think the
5 technical review term came up only just in the
6 brief like last few months, so that if Board
7 members felt they could do it, we wouldn't
8 have -- that we all could stand as Technical
9 Advisory Panel. I think that's where it all
10 came from.

11 CHAIRMAN MOYER: I think Barry's
12 got the floor, so he should acknowledge the
13 commentors. I think Valerie had a comment,
14 too, Barry.

15 MEMBER FLAMM: Valerie, did you
16 want to make a comment?

17 MS. FRANCES: I wanted to offer --
18 you use technical review elsewhere in your
19 policy manual to describe your Materials
20 Review process, and the addition of technical
21 reports as being different than Technical
22 Advisory Panels, because they're done by a

1 consulting body, rather than a panel convened
2 to give you feedback on the materials. And it
3 was partly due to, also, the issue of 606,
4 where you are serving, in many cases, as your
5 own Technical Advisory Panel, so I think it
6 just shows a richer, broader range of input.
7 And you've been using it elsewhere in your
8 Materials Review process, so it just seems
9 odd, if you're going to use it elsewhere, to
10 not describe it in your Committee Review
11 process, as well.

12 MEMBER ELLOR: And that's pretty
13 much the point I wanted to make, is that, to
14 me, there's a very profound difference between
15 Technical Review, and a Technical Advisory
16 Panel, because a Technical Advisory Panel, as
17 Valerie indicated, indicates that there's more
18 than one mind at work reviewing the material.
19 I think there's a big difference.

20 CHAIRMAN MOYER: Yes, Bob?

21 MR. POOLER: Bob Pooler, National
22 Organic Program. The term "Technical Review",

1 came about from the argument, or public
2 comment that was presented that items for 205-
3 606 did not have TAP reviews. And it was the
4 opinion of the Program, or dialogue between
5 the Program and the NOSB that the Handling
6 Committee was, essentially, the Technical
7 Advisory Panel, and that the reports from
8 contractors were the technical reviews to be
9 used by the Committees, the Technical Advisory
10 Panels for all petitions. Essentially, that's
11 where the terminology came about.

12 MEMBER FLAMM: Bea.

13 MEMBER JAMES: Barry, I would like
14 to suggest at this time that we table the
15 topic of Technical Reviews for our Committee
16 to further explore, and that perhaps we
17 consider removing it at this time, and that we
18 put on the work plan for the Policy Committee
19 to look at technical reviews, how they're
20 discussed in the Policy and Procedure Manual,
21 and come up with a more consistent, and clear
22 understanding of how we're going to be putting

1 it forward in the description of the
2 Committees.

3 MEMBER FLAMM: I think it was the
4 last meeting, the Policy Committee did review,
5 and I think with Materials, the TAP, and
6 technical reviews, so we do have a new
7 statement on that. I think the points have
8 been made here are valid, and maybe we should
9 look at it again. We were, this morning,
10 trying to be consistent, but also responsive
11 to the public. But I think maybe we better
12 look at the removal. It seemed like a simple
13 thing to do, it was more -- almost like an
14 editorial thing, but I see that that's not the
15 case. We'll look at it again.

16 CHAIRMAN MOYER: Barry, the
17 Program has a comment.

18 MR. MATTHEWS: Yes, I just wanted
19 to remind you that our attorneys have
20 determined that the Board can serve as its own
21 TAP.

22 MEMBER FLAMM: But, I think we

1 took note of that, but it doesn't,
2 necessarily, mean we would decide that's the
3 proper course to take, but that we have that
4 authority, I think we realize that.

5 MEMBER JAMES: Okay. So, the
6 Committee will discuss further today the issue
7 of technical reviews being in the
8 descriptions, and, hopefully, be able to talk
9 about that tomorrow then.

10 Additional changes are moving down
11 to the Handling Committee. Again, after 7 CFR
12 Part 205, we'd like to add, "and OFPA". And
13 then the same for the Livestock Committee.
14 And those are the only additional friendly
15 amendments to the description of the
16 Committees.

17 MEMBER FLAMM: Thank you, Bea.

18 The next item, very briefly,
19 addition to the Policy and Procedure Manual by
20 diversity requirements. And this will -- I'm
21 passing on this until the actual decision on
22 the -- that the Board makes about our bio

1 diversity recommendation. But there are
2 several places in the Policy and Procedure
3 Manual that deals with bio diversity, so that
4 would need to be updated when a decision is
5 made.

6 And, finally, Valerie is going to
7 give a report on the, I guess, Steve said
8 earlier, the black hole. Is that -- sorry,
9 Valerie.

10 MS. FRANCES: I'm just providing
11 an update on the effort I've been making in
12 terms of tracking recommendations. And I
13 wasn't going to try to clarify the black hole
14 of Material recommendations and reviews. I
15 was actually focusing on the Non-Material, so
16 I'm not quite addressing probably what you
17 referred to earlier, Steve.

18 But just to expand a little
19 further on what Barbara raised in her report
20 yesterday, which was looking at since 2002
21 there's been 65 Non-Material recommendations.
22 And I want to offer further that 12 of those

1 have gone forward with rule making or
2 guidance, 29 were taken up again and worked
3 through, and revised, and worked on, and
4 examples of that would be the 606 work towards
5 commercial availability requirements, all the
6 aquaculture, stages of recommendations,
7 aquatic plants. There's just been an array of
8 things that you've worked on and improved,
9 and, so, the example of the 606 commercial
10 availability as a recommendation did go
11 forward with guidance. And that came out in
12 the Federal Register notice on submitting a
13 petition.

14 And then, there is the area,
15 though, of things that have -- need some kind
16 of additional action or response, and there
17 are 27 of those. And aquaculture, pet food
18 are examples of those, along with some of the
19 discussion that you had yesterday about the
20 certificates, and expiration, renewal dates,
21 standardization. Those sorts of things, I
22 think, are still sort of on the table to be

1 figured out. But I just wanted to provide a
2 little more of a description of where things
3 are at, and working towards getting some more
4 resolution on how to strategically move
5 forward on those things. So, that's just a
6 little more information.

7 MEMBER Thank you, Valerie. Sorry
8 for characterizing it that way. That
9 completes the Policy Committee's report on its
10 recommendations.

11 CHAIRMAN MOYER: Thank you, Barry.
12 We appreciate that report, and your team's
13 hard work, as well.

14 Moving on, we're going to go to
15 the Compliance, Accreditation, and
16 Certification Committee. Chairman Joe
17 Smillie. Joe, the floor is your's.

18 MEMBER SMILLIE: Good morning,
19 everyone. We'll follow it in the order that
20 it's presented.

21 First item is going to be our
22 recommendation on peer review system. And

1 you'll notice it says "system", because what
2 we're looking to create is a systemized
3 approach. I'm not going to go through the
4 document. It's been posted for quite a while.
5 I presume the Board and interested public have
6 read it.

7 The commentators really didn't
8 take issue with any of the history or the
9 regulation citation, per se. But there were
10 a number of comments on this, mostly in
11 support, with some additional guidance. The
12 comments really, quite amazingly, all stemmed
13 from one fountainhead, the lady known as Lynn
14 Cody. Her comments were very precise,
15 succinct, and highly evolved. Most of the
16 commentators simply cited her comment in their
17 comment. And we took note of that comment.

18 The only comment that really
19 veered from Lynn's core points was the OTA
20 comment. And that was absolutely technically
21 correct. OTA pointed out that the peer
22 review, as mentioned in both OFPA, and the

1 regulation citations you can read, was set up
2 to evaluate candidates for accreditation. And
3 that was the original intent of OFPA, and the
4 regulation. However, we have evolved to a
5 system that I think is basically universally
6 agreed that it just isn't appropriate for a
7 Peer Review Panel to be evaluating candidates
8 for accreditation; that the real role that
9 we're looking for, and it is an evolution from
10 OFPA and the regulation, is an oversight of
11 the accreditation of the NOP program, itself.
12 And, so, while technically correct, we
13 respectfully disagree with the OTA comment.
14 And we will proceed in our recommendation to
15 talk about the Peer Review System as an
16 evaluation of NOP accreditation.

17 Basically, if we want to go -- the
18 Committee met and has decided upon a number of
19 additions to our recommendation, and those are
20 underlined above. What we are looking for now
21 in the discussion is an evaluation by ANSI, or
22 the National Institute of Standards and

1 Technology, NIST, program called the "National
2 Voluntary Conformity Assessment System
3 Evaluation", NVCASE Program II, the ISO 17011
4 standard.

5 We also think that evaluations by
6 OIG should be utilized by ANSI or NIST as part
7 of their evaluation, and I would add "system",
8 if you could just add system, Val.

9 Now, we decided to leave ANSI in
10 as an option for a couple of good reasons.
11 One is, the excellence of the job they did in
12 2004-2005, and, also, ANSI is the U.S. sole
13 representative at the ISO table. I'm not sure
14 of NIST's involvement in that, but I know that
15 ANSI is the U.S. rep at ISO. We think that's
16 important, and we think ANSI has good
17 credibility. And we certainly wouldn't want
18 to straight jacket our dear friends at the
19 National Organic program. We'd like to give
20 them options to pursue in consultation with
21 the NOSB, and, of course, the public.

22 We also feel very strongly, based

1 on recent experiences by a number of
2 accredited certifiers, including my company,
3 that the OIG evaluation is, although internal,
4 and not necessarily directed towards 17-011,
5 extremely valuable, thorough, and competent.
6 And that should be part of the mix. So, any
7 evaluation of the NOP should include the
8 internal evaluation by OIG.

9 They've been very busy for the
10 last couple of months, and I'm sure we all
11 anxiously await their public report. And we
12 believe that either NIST, or ANSI, should take
13 that into consideration.

14 So that's basically it. If you
15 can move down, Val, to the recommendation,
16 we've simply added NIST, save type space, to
17 the mix. The other comment that was made
18 orally, I'm not sure that it was a written
19 comment, was that it should be annual. We
20 don't feel that that's appropriate. The
21 accreditation cycle for certifiers is every
22 five years, not every one year, as someone

1 stated yesterday. And a three-year cycle
2 gives enough time for the evaluation review,
3 response, counter-proposal, whatever. It
4 takes time to go through this, and three years
5 is plenty. It could be even enlarged, I
6 believe, to four, possibly even five. But
7 we'll stick with three for the time being,
8 since that's the number of years it takes to
9 qualify as Organic. It's an historically
10 significant number.

11 So, to keep it short, that's it.
12 We accept the public comment that NIST should
13 be certainly considered, and, actually, as we
14 heard at the beginning yesterday, if you
15 weren't here, that the ARC branch,
16 Accreditation, Review, and Compliance --
17 Audit Review - I'm sorry - Audit, Review, and
18 Compliance has achieved NIST accreditation.
19 So, obviously, the NOP is on their game, and
20 they're ready to take the next step to fulfill
21 the regulation and OFPA. I'm done. I'm done
22 in more ways than one.

1 (Laughter.)

2 CHAIRMAN MOYER: Joe, I just
3 wanted to say that I think this is an
4 excellent example of how a Committee does its
5 work, presents it to the public, gets response
6 from the public, incorporates it into their
7 document, makes the changes, and it's a better
8 document because of it, so great work to you.

9 MEMBER SMILLIE: I will turn it
10 over to Julie.

11 SECRETARY WEISMAN: Can I make a
12 request?

13 MEMBER SMILLIE: Sure.

14 SECRETARY WEISMAN: Can I move
15 down in schedule? I am having a lot of
16 trouble integrating my role as Board Secretary
17 with other responsibilities that I have,
18 including presenting this. And I don't have
19 all my -

20 MEMBER SMILLIE: Ducks in a row.

21 SECRETARY WEISMAN: -- documents
22 up, so I would appreciate being able to -

1 MEMBER SMILLIE: In addition to
2 your work on the Handling Committee, I might
3 add.

4 SECRETARY WEISMAN: Yes. Thanks.

5 MEMBER SMILLIE: So, we go from A
6 to Bea.

7 SECRETARY WEISMAN: I'm sorry,
8 Bea.

9 MEMBER JAMES: Good one, Joe.

10 Okay. I'll be talking about our
11 discussion document, Voluntary Retail
12 Certification. And I guess I'd just like to
13 start with posing the question that I think
14 most people had in the public comments, which
15 is, why are we looking at Voluntary Retail
16 Certification?

17 I think the simple answer is to
18 improve and strengthen retail certification,
19 and to make sure that the Program is providing
20 clear guidance, so that retailers, and
21 certifiers, and consumers know exactly what
22 organic system plan, inspection protocol, and

1 consumer marketing messages are expected of
2 retailers.

3 The more complex answer stems from
4 many public comments that we received and
5 heard yesterday, that asked the question, "can
6 retailers be certified, at all, if they are
7 not processing?" Which the Program, I
8 believe, clarified yesterday by stating that,
9 "Continued retailer certification is best
10 served under the umbrella of the Program.
11 And, additionally, the CACC believes that
12 Voluntary Retail Certification is enforceable
13 within the guidelines of the regulation. But
14 that, perhaps the Committee will explore this
15 issue further." And as one of the commentators
16 suggested yesterday, we'd like to ascertain
17 what departments are best served under the
18 current regulation for Voluntary Retail
19 Certification.

20 I, also, would like to acknowledge
21 that many comments regarding retailer
22 certification were strongly opposed to a

1 multi-site construct applied to retailers. We
2 definitely heard that message loud and clear.
3 And I'd like to reiterate that the core of
4 this recommendation is to explore how we can
5 strengthen and clarify Voluntary Retail
6 Certification. And it is not to try to scheme
7 a route to create an inspection protocol that
8 would mimic the farmer grower groups.

9 Our opportunity for addressing
10 retail certification is now, and the Committee
11 absolutely appreciates all the public comments
12 to help steer us in the direction of a
13 discussion document towards a recommendation
14 that we hope to be able to propose at the
15 November meeting. Retailers want to be
16 certified, and have invested heavily in trying
17 to create good organic handling from farm-to-
18 store, so our consumers feel confident about
19 the products that they purchase with the USDA
20 seal.

21 And just to wrap it up, I'd also
22 like to mention that many commentors also

1 welcomed, and expressed the need for
2 consistent guidance and regulation to support
3 the continuation of USDA Voluntary Retail
4 Certification. And it's the goal of the CACC
5 to explore this issue so that retail
6 certification is supported by the industry,
7 and understood by consumers. That's all I have
8 to say, and I will take any questions.

9 MEMBER GIACOMINI: There was a --
10 I don't remember how many. There are a
11 number of comments suggesting that we -- even
12 though it's voluntary, we write regulations
13 for retailer certification. Where does the
14 Committee stand on that idea?

15 MEMBER SMILLIE: We're going to
16 look at that. We're going to look at it by
17 departments. Certainly, if any processing,
18 which includes re-labeling and re-packing, I
19 would carefully add, if they're already
20 processing, we believe that they are handlers,
21 so we'll look at it department by department.
22 We may come to the conclusion that the grocery

1 aisle doesn't qualify, but that the deli,
2 produce, bulk, what else? Bakery, would all
3 qualify as processors, and may not need more
4 specifics.

5 Again, the specifics, when you get
6 right down to it, might be left up to
7 certification organizations, which are
8 currently doing it now, anyhow, but we might
9 want to add those items to our -

10 MEMBER JAMES: And I just want to
11 also comment on that. It's actually a lot
12 more complex than that, because bulk foods is
13 often found within the grocery aisle, so it
14 might just be that the grocery aisle would be
15 included. And I know that there are several
16 retailers that have invested in having the
17 grocery department certified, because bulk
18 foods is within the packaged grocery
19 department.

20 MEMBER GIACOMINI: It just seems
21 that over the past few years, some of the
22 biggest problems we've seen to have had are in

1 signage. We always talk about the dripping
2 ice, but we have -- and that's what I call
3 physical contamination. Well, I'm just as
4 concerned with what I'll call mental
5 contamination, with bad signage,
6 misrepresentation in advertising, and all
7 those issues. And I think if we're going to
8 go that route and really strengthen the
9 voluntary program, I think we need to really
10 look at those issues.

11 MEMBER JAMES: I would like to
12 respond to that by saying that I couldn't -- I
13 can speak on behalf of the Committee, that we
14 couldn't agree with you more. And that a lot
15 of the inconsistencies that we see with
16 voluntary retail certification is a
17 misunderstanding of some retailers on what the
18 marketing message needs to be for the
19 consumer. So, we hope to be able to address
20 that by clarifying that, and what our
21 recommendation will be at the November
22 meeting, so thank you for those comments.

1 MEMBER MIEDEMA: Good morning.
2 This is a discussion document, and I guess
3 I'll start out by saying that about five years
4 ago, a woman came before our Board, and she
5 did something very dramatic and memorable.
6 She stood up and she took a bite of a bar of
7 soap, and it lives on in the annals of
8 presentations before this Board.

9 Well, I brought a bar of soap
10 today, and I'm not going to take a bite of it.
11 And no one is going to wash my mouth with it,
12 but this bar of soap was in our hotel room at
13 the last meeting. And it was -- it says
14 "Organic bar" on it. And this is a mislabeled
15 organic product. And, of course, it was this
16 supremely ironic thing that all of these
17 National Organic Standards Board members were
18 stocked with improperly labeled organic
19 products, and probably completely bogus
20 organic products. There's nothing on here
21 that talks about who certifies it. It just
22 says, "organic", and it says, "Made in China"

1 on the back. And it was a clever marketing
2 term for somebody who packaged this up. They
3 felt completely unfettered in their use of it.
4 The person buying it wasn't working under any
5 constraints that they were too worried about,
6 so it really galvanized my interest in looking
7 at this issue a lot more closely, and decided
8 to investigate.

9 I'm not going to, in making this
10 presentation, present myself as an expert.
11 Joe actually has a lot more expertise on the
12 topic. And there are many members of the
13 public who are here today, who have devoted
14 their lives, their entire adult professional
15 lives to developing standards, and really to
16 developing healthier personal care products.
17 But the status quo, it's very confused.

18 In 2005, the Program issued a
19 document essentially saying organic personal
20 care products will move forward. And they
21 made one comment that's at the very end of
22 this memo, August 23rd, 2005, that is often

1 quoted. "The NOP will pursue such rule making
2 as expeditiously as possible." But things
3 change, times change. There is a new guidance
4 issued in April of 2008, that said, "Any
5 cosmetic body care product or personal care
6 product that does not meet the production
7 handling, processing, labeling, and
8 certification standards described above may
9 not state, imply, or convey in any way that
10 the product is USDA certified organic, or
11 meets the USDA organic standards."

12 It sounds like drawing a line in
13 the sand, but there's a giant caveat, and the
14 giant caveat is what's giving a lot of people
15 pause in the industry. And here's our thicket
16 of competing regulations. Because USDA went
17 on to say that, "USDA has no authority over
18 the production and labeling of cosmetics, body
19 care products, and personal care products that
20 are not made up of agricultural ingredients,
21 or do not make any claims to meeting USDA
22 organic standards." So, now we started to

1 tiptoe into some murky waters. Very much at
2 the crux of our synthetic/non-synthetic,
3 ag/non-ag discussions that we're having as
4 well.

5 Lastly, the NOP said that,
6 "Cosmetics, body care products, and personal
7 care products may be certified to other
8 private standards, and be marketed to those
9 private standards within our borders in the
10 United States. These standards might include
11 foreign organic standards, eco labels, earth-
12 friendly", et cetera. USDA's NOP does not
13 regulate these labels at this time.

14 So with that sort of rubric in
15 mind right now, I look back at this soap, and
16 maybe it is legal. Maybe it was fine, because
17 maybe there is a certifier at the end of this
18 who doesn't require their name be printed.
19 The truth is, I have no idea.

20 I was at a kids' soccer game a
21 week or so ago, and was talking with a friend
22 and colleague of mine about what I was doing

1 in D.C. this week. And she said oh, I'm not
2 going to buy any of that organic stuff. I
3 just -- it seems all over the place. I don't
4 know if it's really organic. And she was
5 somebody who was very motivated, and wanted to
6 really upgrade her purchases of personal care.
7 And I think it sums up a lot of consumer's
8 feeling right now, is that they just don't --
9 they don't know what organic means in this
10 realm of products.

11 Now, it's one of the bright spots
12 in the industry. It's one of the highest
13 growth areas. There's a lot of urgency.
14 There's a lot of interest in companies
15 investing money. And, in fact, a lot of money
16 has been invested. We have this ground swell
17 of attention around the new ANSI Made With
18 Standard, and that'll kind of take its own
19 life, and start, I guess, being used, and
20 adopted.

21 What we tried to do in this
22 discussion document, first and foremost, was

1 give a forum for public comment, and get some
2 public comment on the record for us all to
3 look at together. But what we state is pretty
4 bold. I mean, we're saying NOP, own the word
5 "organic", so that there's no confusion, no
6 more confusion for consumers. And take that
7 step.

8 All of the enormous amount of
9 regulation that we'd need to write would need
10 to follow. Maybe there would need to be a
11 task force. There's certainly a wealth of
12 informed people to draw from. We didn't
13 advocate for a task force in our discussion
14 document. We went right to the heart of the
15 matter, found places in the regulation that
16 would need language changes. If you could
17 scroll down a little bit, Valerie.

18 We tried to, just the facts,
19 ma'am, get right to where in the regulation
20 would need to be changed in order for these
21 products to have a home in the National
22 Organic program. Any questions? Bea.

1 MEMBER JAMES: I don't know if
2 we're capable of even answering this question
3 or not, but one of the concerns that I have is
4 with organic body care, or cosmetics. What is
5 the likelihood that we'll end up needing to
6 have a lot of synthetic, non-agricultural
7 ingredients on the National List, in order to
8 support cosmetics?

9 MEMBER MIEDEMA: I have some
10 thoughts on that. I'm going to defer to Joe,
11 though, on this one.

12 MEMBER SMILLIE: My opinion is
13 that it's got to be agricultural. Okay? But
14 it will be, also, definitely synthetic. In
15 other words, you're going to take -- in order
16 to achieve efficacy, the personal care
17 companies have pushed as far as they can push,
18 I think, and we've got some experts in the
19 room, to achieve a certain body of products
20 that meet the NOP standard. To go passed
21 that, to get shampoos and other things, they
22 need essential ingredients, which can be

1 derived from certified organic agricultural
2 ingredients. But the processes that these
3 ingredients would go through are undeniably
4 synthetic processes. They create chemical
5 change, with even the most liberal
6 interpretations of synthetic, which is not the
7 way we're going. But with the most liberal
8 interpretation of synthetic, they would still
9 be synthetic. And what I would advocate is a
10 separate section of 605C, which would be
11 annotated for personal care use only.

12 Now, the chemists in the personal
13 care world know a lot about this. And they
14 can come to agreement about which processes
15 are called, in a loose term, "green
16 chemistry." In other words, there's --
17 originally, and I won't bore you to tears
18 with all this technical stuff, but get ready
19 for it. You're going to have to learn some
20 more chemistry. Barbara, bring out that old
21 manual again on the chemistry thing, because
22 what it is, is that there's -- you can achieve

1 the same end result through different ways.
2 It's still esterification, and maybe we'll
3 have some good examples in the public comment,
4 but there is better ways to do it. There's
5 less invasive, less polluting, less irritating
6 ways of achieving that. And those could be
7 qualified, and quantified. So, it's possible,
8 but it will be synthetic. If the NOP takes it
9 on in cooperation with the FDA, or however
10 they work that out, then, basically, we will
11 see a lot of products petitioned to be added
12 to 605. But, again, I believe that it's
13 doable, because we can annotate them for
14 personal care use only.

15 CHAIRMAN MOYER: I believe Tracy
16 has the floor.

17 MEMBER MIEDEMA: Kevin.

18 MEMBER ENGELBERT: I'm interested
19 in what your thoughts are concerning soap.
20 You're going to use cosmetics, rather than
21 personal care products, and you exempt soap
22 from your recommendation, and that was your

1 example. Is that the only personal care
2 product that doesn't qualify as a cosmetic?
3 And where do you think that will come into
4 play with your recommendation, or will you
5 eventually talk about, or just deal with the
6 soap?

7 MEMBER MIEDEMA: It's a great
8 question, Kevin. The reason we used
9 cosmetics, which does include soap, as you --
10 or exclude soap, as you pointed out, was to
11 really bridge USDA and FDA, so we used this
12 very precise definition that FDA uses. Based
13 on some of the public comment that we're
14 hearing, we probably need to expand what we're
15 talking about here outside of the word
16 "cosmetics."

17 I think it just gives a lot of
18 people pause, and they're not seeing that as
19 the FDA -- it seems more like makeup, instead
20 of the FDA version, which includes lotions,
21 and shampoos. So, we most likely need to
22 write a definition of personal care. And

1 there are some good ones. There's a good one
2 even in the ANSI standard already that we
3 could turn to, and to make sure soap doesn't
4 get left out. Katrina.

5 MEMBER HEINZE: Certainly, as a
6 consumer who has been confused by this, I
7 empathize with the goal, and support the goal.
8 I guess what I'm struggling with, and I'd be
9 interested in the Program's perspective on
10 this, is whether it's even within our
11 jurisdiction, or an option available, since
12 it's the Organic Food Act. And we certainly
13 had a number of public comments on that topic.

14 MS. ROBINSON: We did discuss this
15 with our legal counsel, because I had that
16 same reaction, actually, Katrina. My first
17 reaction was, it is outside of our
18 jurisdiction. And I believe I raised that on
19 an Executive Committee call. So, I did
20 consult with our attorneys, and ask if we had
21 this jurisdiction. And their reply was
22 actually, yes, we do, that these are merely

1 processed products. That's what they would
2 be. And the simple way to approach this, is
3 that -- the way that I came to understand it
4 was that what we would be doing is basically
5 expanding the National List for a broader set
6 of processed products; namely, personal care
7 products that are largely agricultural in
8 their origin, but require additional
9 synthetics in order to be finally produced,
10 and then labeled under our labeling scheme.
11 So, for example, you could take the NSF
12 standard, the ANSI standard 305 out there,
13 give it to the Board and say do you guys want
14 to incorporate this by reference, and turn
15 around and make a recommendation to NOP that
16 we expand the National List with all of these
17 synthetics, and their annotations, and proceed
18 with rule making to allow for these products
19 to come under the labeling scheme of the NOP
20 regulations.

21 MEMBER HEINZE: Thank you. I do
22 have a follow-up. I think then as we consider

1 moving forward, there are several lines of
2 products that have been introduced that do
3 carry the USDA NOP certification, where
4 they've found a creative, innovative,
5 technically sound solution. And, certainly
6 that should be encouraged and rewarded. So,
7 then how do you create a path forward for
8 other products without diminishing a standard?

9 MEMBER MIEDEMA: Joe.

10 MEMBER SMILLIE: I would say that
11 the use of the word "organic" on a product
12 means that they've achieved that, and the
13 "Made with" would be the option for a lot of
14 products that won't be able to achieve 95
15 percent.

16 The soap example is a good one,
17 Kevin. We even had some comment, if you look
18 at it, to talk about whether you really could
19 certify soap currently. There are, right now,
20 certified soaps, because 605B allows the use
21 of sodium hydroxide. And soap is some sort of
22 palm oil, some vegetable oil reacted with

1 sodium hydroxide. Now, how much sodium
2 hydroxide, you get into the calculation game,
3 and that's one of the problems that we will
4 face in dealing with personal care products,
5 is you thought it was hard calculating multi-
6 ingredient food, start trying to calculate
7 this stuff. So, some people believe that you
8 can certify soap, other people believe that
9 you can't based on how the calculation is
10 done. So, soap is kind of a good example,
11 because we do have USDA NOP "Made with" soaps
12 out there right now. And I think there may
13 even be organic soaps out there. I'm not
14 sure, under the NOP label, depending on how
15 the certifier did the calculations of the
16 sodium hydroxide.

17 MEMBER MIEDEMA: Jeff.

18 CHAIRMAN MOYER: The two questions
19 I have are, what would we do with cosmetic
20 products that don't start with an agricultural
21 base, and don't fall under this category?
22 Would they then be able to use the word

1 "organic" without having to be certified, and
2 still add to the confusion? Because they
3 don't fall under this guideline, and we have
4 no authority over it, if it has no
5 agricultural background.

6 And then the second question I
7 have is how -- the cosmetic industry, from my
8 understanding, seems to be really moving in
9 the direction of nanotechnology. How is that
10 going to impact this whole statement, because
11 we are already seeing all those kinds of
12 products being made virtually invisible
13 through nano- technology.

14 MEMBER MIEDEMA: Well, these are
15 all excellent questions, Jeff. And the short
16 answer is that if it's not organic, it won't
17 be able to be labeled organic. What this
18 discussion document proposes is planting a
19 flag in the regulation so that we can move
20 forward and answer those questions in detail.
21 We've done things the other direction, which
22 is build a whole thicket of regulation, and

1 then come to the program, and ask if we can do
2 this at all.

3 I really wanted to start with the
4 buy-in from the public, and make sure this is
5 the direction the public wanted to go, that it
6 was feasible for the program. I'm very
7 encouraged to hear today that it is, in fact,
8 feasible for the program. And plant that flag
9 in the regulation. It would certainly have to
10 be agriculturally based in some manner. But
11 we don't have to sit here this morning and
12 figure this out. There's people, like I said,
13 who have devoted their entire professional
14 lives. And, for the most part, these
15 questions have been sorted out, and there's
16 debate amongst the companies that are
17 currently producing products that they feel
18 are organic.

19 It's fascinating to listen to
20 these really smart people debate. There's
21 quite a schism even amongst these folks, but
22 that can all be sorted out.

1 CHAIRMAN MOYER: Yes. I recognize
2 we won't solve those problems all today. I
3 think part of the reason for this discussion
4 that folks have is to get these questions on
5 the record, so that the public can start to
6 react and respond to them. So, thank you,
7 appreciate that.

8 MEMBER SMILLIE: The key thing,
9 though, is the USDA owns the word "organic",
10 so nobody can use that word unless they meet
11 what the USDA decides as a regulation.

12 CHAIRMAN MOYER: Only as it
13 pertains to agricultural products, though.

14 MEMBER SMILLIE: Right.

15 CHAIRMAN MOYER: They don't own
16 the word in terms of manufacturing of
17 computers or something.

18 MEMBER SMILLIE: Correct. We're
19 only talking about agricultural products.

20 CHAIRMAN MOYER: Right. But some
21 cosmetics don't have any agricultural products
22 in them, is my concern.

1 MEMBER SMILLIE: Well, then
2 that'll be FTC's job.

3 CHAIRMAN MOYER: Barbara has a
4 response, I believe.

5 MS. ROBINSON: Well, I think one
6 of the things -- just sitting here discussing
7 this. One of the things -- if you go down
8 this road, one of the things you may want to
9 really consider, because we'll always confront
10 the problem, and we've talked about this.
11 We're going to continue to confront this
12 problem as this industry grows, of people
13 wanting to use the generic word "organic" for
14 products for which we do not regulate. That's
15 just going to happen. And to cut down on that
16 green noise, and the devaluation of that word,
17 I think you really should start contemplating
18 an additional seal, or an additional label to
19 go along with the "Made with", that the "Made
20 with" label also has its own -- we've not
21 allowed the seal to go on a "Made with"
22 product, but any kind of USDA recognition on

1 that product. And I think that's where, if
2 you would start to give some thought to that,
3 putting USDA on a "Made with" product, you
4 would close that door for the non-agricultural
5 products out there, because then consumers
6 could see clearly that even a "Made with"
7 organic product, if it has USDA on it, it's
8 ours. It belongs to us. And then we can say,
9 you can say when we're doing education and
10 outreach, look for USDA's name on a product.
11 If you don't see USDA on it, it's not ours,
12 and we don't regulate it. Until we get to
13 that point, "Made with organic" out there is
14 a fuzzy world, and it always will be.

15 MEMBER MIEDEMA: Valerie, and then
16 Bea.

17 MS. FRANCES: This is actually a
18 question for Barbara. You referenced -- well,
19 you said earlier that we could incorporate a
20 private standard by reference into our
21 regulation. Is that really the case?

22 MS. ROBINSON: I said the Board

1 could make a recommendation, because there is
2 a private standard out there, and the Board
3 can simply take that private standard, if they
4 chose to, if they liked that private standard.
5 And they can give it to the program as a
6 recommendation. That's all.

7 MEMBER MIEDEMA: Bea.

8 MEMBER JAMES: Yes. Tracy, I just
9 wanted to -- I know you're following the OTA,
10 I think you are, the OTA Cosmetic Discussion
11 Board, and I've been watching that, too. And
12 just their last discussion was very similar to
13 what Barbara is referencing. Is there a way
14 for us to have a different way of
15 communicating on a cosmetic label without it
16 being perceived by the consumer that it's the
17 exact same thing as an agricultural product.
18 And it seemed like some of the -- as you
19 mentioned, big companies, highly intelligent
20 companies who have been behind this for a long
21 time -- were supportive of that idea.

22 MEMBER MIEDEMA: Thanks. Any

1 other questions? Comments? Thank you.

2 MS. FRANCES: I do have one more
3 question. This problem of products that don't
4 contain agricultural ingredients that somehow
5 can use the term organic and be okay, because
6 it's outside our scope of authority, I'm just
7 going to throw the question, is there a way to
8 address that in any other way? And I don't
9 know the answer at all.

10 MEMBER MIEDEMA: Go ahead, Joe.

11 MEMBER SMILLIE: I don't know, and
12 I'd like some advice from the government
13 people here. But, to me, if someone says
14 "organic", and it's non-agricultural, and it's
15 got an agricultural claim, it's got an organic
16 claim on it, to me, that's misleading the
17 consumer. And that's an FTC area. Am I
18 wrong? So if someone made a complaint about
19 a polyester sweater that said organic -- buy
20 this organic sweater, and it was made of
21 polyester, and some consumer thinking that it
22 was an organic sweater bought it, they could

1 take that case to the FTC, because they were
2 misled. But correct me if I'm wrong,
3 government people.

4 MR. MATTHEWS: I would say that
5 that would be the place to go.

6 CHAIRMAN MOYER: Barbara, did you
7 want the floor now?

8 MS. ROBINSON: Sure.

9 CHAIRMAN MOYER: Okay.

10 MS. ROBINSON: Ladies and
11 gentlemen, Chairman, members of the Board,
12 it's my honor and my privilege to introduce to
13 you the Deputy Secretary of Agriculture,
14 Kathleen Merrigan.

15 (Applause.)

16 DEPUTY SECRETARY MERRIGAN: Whoa,
17 whoa, hey, everybody. Old home week, huh?
18 So, I'm Deputy now. Unbelievable. So, thanks
19 for letting me interrupt, and thanks for
20 inviting me to come to your -- or maybe you
21 didn't know you invited me to come to your
22 meeting. Or maybe even I said I wanted to

1 come to the meeting. I'm not exactly sure how
2 all that came together, but I'm glad to be
3 here, and it's familiar stomping grounds. A
4 lot of hard work. I feel like I know what
5 it's like to be in your shoes.

6 Twenty years ago I was approached
7 by Mark Lipson and others when I was working
8 for Senator Leahy to write the Organic Foods
9 Production Act. And fourteen years ago, I was
10 on the other side of the table sitting where
11 you all are today, because I was an appointed
12 NOSB member, and almost served out my five
13 years as an environmental representative, but
14 then became AMS Administrator, and had to go
15 take care of that little rule, so I was a
16 little short of serving five years.

17 So, let me first say thanks to all
18 the NOSB members for your service. I know how
19 much hard work it is, what kind of passion you
20 put in, the long hours, and the pretty active
21 constituency that we have here, loyal people
22 that come to every NOSB meeting, and follow

1 all the iterations, and really give a lot of
2 important input into the process. I really
3 want to thank you all. I know it's a long,
4 long process, and there's no end in sight.

5 (Laughter.)

6 DEPUTY SECRETARY MERRIGAN: So, I
7 want you to know that I think there's a lot of
8 people at USDA listening, and looking for
9 opportunities to work with the organic
10 community in new and important ways.

11 Secretary Vilsack has been a great, great
12 leader already. I've been really excited to
13 be working with him at USDA. He's committed
14 to achieving greater sustainability throughout
15 USDA's programs and policies, the National
16 Organic Program and Body Sustainability. We
17 are really interested in what you do here.

18 I notice on your meeting agenda,
19 one of the things that you have to debate is
20 bio- diversity. Oh, whoa, that's a big
21 important issue for the organic world. It's
22 a principle that a lot of us hold dear. But

1 I also remember when we were putting out the
2 second proposed rule, and then the final rule,
3 how difficult it was to negotiate that word,
4 just the word "biodiversity" in the definition
5 of organic, what we thought of organic,
6 because OMB and others kept saying well, how
7 are you going to measure it? How are you
8 going to enforce it? These are tough
9 questions, but I know you've got a lot of able
10 minds in the room, and I will welcome whatever
11 recommendations that you come up with in that
12 area.

13 Let's see. What am I supposed to
14 say to you guys? Well, I want to make a few
15 announcements. First is, I think all of you
16 are familiar with the People's Garden, so some
17 of these are things that you've heard. But in
18 case you haven't, I wanted to bring you up to
19 speed.

20 The People's Garden was something
21 that was initiated by Secretary Vilsack before
22 I arrived at the Department on April 14th. It

1 is on the Whitten Lawn. There is a vegetable
2 garden there, pollinated garden, all organic.
3 Valerie was there with a bunch -- a bunch of
4 the staff was there from -- Barbara Robinson,
5 I saw a picture of you with a hoe, or a
6 shovel, or something. I don't know. I think
7 that the organic staff was pretty involved in
8 that. And we have a Secretary of Agriculture
9 who is out there saying, here's the People's
10 Garden, and it's an organic garden. And
11 challenging USDA facilities across this
12 country and abroad to also take on their own
13 gardening activities on their facilities.

14 Of course, when the press probed
15 me afterwards at the close, I said are you
16 saying that all USDA facilities should be
17 organic gardens? I said no, these are not
18 decisions dictated by headquarters, but we're
19 going to use this garden to help us talk about
20 the role of organic agriculture, and American
21 agriculture, and the importance of standards,
22 and use it as an educational tool.

1 So, I just want to make sure,
2 first of all, that you all know about that
3 initiative. It's exciting. It had a lot of
4 buzz, and I think there will be a good flow of
5 events and information that comes from that
6 over the years.

7 The second thing, and I'm sure
8 most of you saw this, an announcement about
9 the census of agriculture, that USDA is
10 putting out a survey to all organic farmers,
11 and we're asking that -- I think they're going
12 out this week or next -- and we're asking that
13 the results be turned in in mid-June. Does
14 that sound right, Barbara? She's shaking her
15 head. I've got my -- I'm fuzzy on the dates,
16 but I'm hoping everybody helps us get that
17 word out, and make sure that happens, because
18 that data will help us orient USDA programs
19 appropriately. It's a great opportunity.
20 And, again, that was something -- I had no
21 input in that. Secretary Vilsack was on top
22 of that, and that happened before I got to the

1 Department. I think that's great.

2 The third thing I want to announce
3 is that the organic program has grown up.
4 We've all grown up in a lot of ways. Some of
5 us have grayer hair, some of us have less
6 hair. We know each other well. And I think
7 that considering the growth in the industry,
8 and the demands this program puts on USDA --
9 I don't mean that in a bad way -- the demands
10 that this program puts on USDA, that I think
11 it's time that we have a Senior Executive
12 Service employee dedicated just to the
13 National Organic program.

14 Barbara has been doing a great
15 job. We've asked her, though, to do double
16 duty. The National Organic program isn't the
17 only thing she has to do. She has this whole
18 other Division of Transportation and Marketing
19 in an area where I think a lot of our
20 interests in local foods that comes on down
21 from the President, through the Secretary, to
22 me, a lot of those issues are going to blossom

1 in Transportation and Marketing. And I'm
2 worried about an overload on that system, so
3 we're going to move forward with that, and
4 there'll be an announcement of the position --
5 and things will be advertised and followed,
6 that sort of thing.

7 The fourth, and most exciting
8 thing, I think right now that I wanted to
9 announce for today is a big pot of money. How
10 does that sound? A big pot of money always
11 sounds good. Okay. We're announcing today
12 \$50 million in funding to encourage greater
13 production in organic food, \$50 million to the
14 EQIP program, Environmental Qualities
15 Incentive Program. I know some of you fought
16 for this in the Farm Bill. We're up against
17 a fiscal year clock, and so we need to get the
18 money out of Dodge, and get it spent before we
19 lose it.

20 This is important financial
21 assistance to help people who are committed to
22 organic production to put those methods and

1 actions into play. It will be for current
2 certified organic producers, as well as people
3 in transition. A portion of this \$50 million
4 will be allocated to every state.

5 For this current year, because
6 we're up against a fiscal year clock, use it
7 or lose it -- I know some of you probably are
8 in organizations where you're familiar with
9 that situation -- we're using the allocation
10 formula that we've used for the overall EQIP
11 program, so you may look at the allocations,
12 and say why does that have -- why does that
13 state have that big chunk of money, and this
14 state has more organic producers has less?
15 It's just because we're under the gun, and Tom
16 Christiansen -- did I say it right? Okay. --
17 from NRC, I probably met a thousand times, and
18 he's being very kind, and not reminding me of
19 that, is with me from NRC. That's in case you
20 have the tough questions. But for this year,
21 we needed to do that, because we have time to
22 come up with an organic-only allocation

1 formula. But that's the plan for the coming
2 years. And the good news, too, is if there's
3 a state that has a bigger pot than there's an
4 organic demand, the Chief and the staff are
5 planning on reallocating that money to where
6 the greater need is. So, we don't plan on
7 having money sit out of this pot of \$50
8 million unused. We want to get it out there,
9 and we want everyone to benefit from it.

10 It's going to be available
11 exclusively through a special sign-up. And
12 it's going to be focused on six core
13 practices, conservation, crop rotation, cover
14 crops, nutrient management, pest management,
15 prescribed grazing, and forage harvest
16 management. So, these core practices were
17 identified in meetings that the NRC has had
18 with the organic community, as where the money
19 should be placed.

20 The funding for every producer is
21 capped at \$20,000 a year. This is for this
22 particular organic pot of money. The cap

1 doesn't apply -- say you may already be
2 getting EQIP funding, or you might -- I hope
3 all of you know about the EQIP program. It is
4 a big pot of money. And this \$50 million that
5 we're talking about that's an allocation for
6 individual farmers is not inclusive of also
7 the money that we'll put into technical
8 assistance, the technical service providers
9 component of that. And we'll be talking about
10 that more in the coming weeks.

11 So, the \$20,000 cap is for this
12 organic pot of money. You might say well,
13 heck, the regular EQIP doesn't have a \$20,000
14 cap, why is that? Well, that was because we
15 heard from the organic community that they
16 wanted that cap there to insure that a few big
17 operations didn't get the hog share of the
18 money, that it would be widely distributed,
19 and available to a lot of small producers.
20 So, I believe that's reflective of the input
21 that we received from all of you. And, again,
22 it's a cap only on that pot of funding.

1 So, the sign-up for these special
2 organic contracts is going to begin May 11th,
3 and it's going to end on May 29th. And, at
4 that point, applications will be ranked, and
5 we'll figure out what to do. So, time is
6 short. I know, I apologize for that. I know
7 when people are out there in the field, it's
8 really hard to turn those things around. So,
9 what I'm asking all of you is to get the word
10 out right away, to do what you can
11 systematically as organizations, as leaders in
12 the organic industry, to help producers figure
13 out how to navigate this. And, hopefully,
14 we'll have some good come of it.

15 So, that's what I'm here to say
16 today. I think those are all great things.

17 (Applause.)

18 DEPUTY SECRETARY MERRIGAN: Yes.
19 Thanks.

20 I do want to say that lastly, I'm
21 holding office hours tonight from 4 to 8 at
22 the Deputy's office for all of you. And I

1 think Barbara has volunteered a staffer, I
2 don't know who it is, to sort of sign you guys
3 up thinking maybe on the 15-minute mark, would
4 be great fun. I don't have wine and cheese.
5 It's just going to be a water fountain and me,
6 but if you want to come by and say hello, or
7 whisper in my ear, scream at me, that's the
8 time for it. I could have made it maybe
9 easier for you, if I had just taken a room
10 here and had you all come there. But part of
11 it is, I sort of want you to feel like you
12 have a little bit of ownership on that corner
13 office on the Mall. It's been a long time
14 coming, and so I thought if you want to come
15 down and visit me there, you're more than
16 welcome. If people don't sign up for this
17 time, or there's a big hour gap, or whatever,
18 I'm not offended. I just wanted to make that
19 opportunity for all of you. And just looking
20 at the crowd, if each one of you took a 15-
21 minute slot, obviously, that's not going to
22 work. So, to the extent that if people are

1 coming over, if there are obvious groupings,
2 that might make sense. Okay?

3 And then my last message to you
4 is, I want to be there for you. I want to be
5 a spokesperson for organic. I'm going to
6 certainly be tasked by this administration to
7 be "sustainability central" at USDA. That
8 said, I'm going to say to you guys the same
9 thing I told to people from other streams of
10 agriculture. Organic is just one thing in a
11 larger portfolio of what I need to do. And,
12 so, if everyone sort of overwhelms me, that's
13 not going to work, either. I want to be there
14 for you, but I've got to be there for a lot of
15 things. And I'm not quite sure, I'm just
16 getting my sea legs on the job. I'm not quite
17 sure how I'm going to do it all. I'm going to
18 try. So just, if you could help me out, and
19 be respectful of that, and figure out what
20 really needs to bubble to the top, and what it
21 is that you can continue to work through the
22 processes that you have in place now at USDA,

1 because I think you have some great staff who
2 work really very long hours. Hopefully, not
3 any more all-nighters. Are we done with the
4 all-nighters? We're done with those. But not
5 only in AMS, but also Tom, people over at NRC
6 asked, there's a lot of enthusiasm about what
7 you do, and I think that you need to knock on
8 those doors, and work out things as you can.
9 Okay?

10 So, I'm open for some questions,
11 or comments, if people would like. Yes?
12 Well, I won't pick a particular thing, but let
13 me say this, that -- and it's something that
14 I try to say to myself every day, just general
15 advice, -- the perfect is the enemy of the
16 good. So, the perfect is the enemy -- because
17 you've got public meeting, and you have to --

18 Okay. So, the perfect is the
19 enemy of the good. And sometimes I think --
20 and I been a part of this myself, and
21 organically failed in that. We want to get
22 everything perfect, and we want 100 percent

1 consensus, and all of that. And we've missed
2 some opportunities to move forward. And the
3 market keeps moving forward no matter what.
4 We need to recognize that. And I was here at
5 an NOSB meeting -- Hue, how long ago was it
6 when I testified, two years? Two years ago
7 when I talked about opportunities that I saw
8 in animal care. And we could have a whole
9 comprehensive package on animal care, or we
10 could sort of go for some of the low-hanging
11 fruit approach, and sort of do it in
12 iterations. And I know that there are
13 advantages to do the whole package, the
14 comprehensive approach, but sometimes that
15 means it's going to take several years. In
16 the meantime, the market is making decisions
17 for you. So that would be an example of the
18 perfect being enemy of the good. I think that
19 will stop all questions. I don't know.

20 CHAIRMAN MOYER: Not to interrupt,
21 Kathleen, but if somebody has a question,
22 please step up to the mic so that the recorder

1 can capture it, or use your mic at your desk
2 here, if you're a Board member.

3 MICHAEL: Hi. I just wondered if
4 you had any thought -

5 MS. FRANCES: Your name is?

6 (Laughter.)

7 MICHAEL: I'm still Michael.

8 (Applause.)

9 MICHAEL: I just wonder if you
10 have any thoughts about -- one of the issues
11 we struggled with in the past is how to
12 coordinate across the agency on this topic, so
13 that cross-compliance, and cross-coordination
14 could be a bit more synergistic across the
15 Department. It's a little early, but I wonder
16 if you have any thoughts about that.

17 DEPUTY SECRETARY MERRIGAN: Well,
18 I do think that just today coming to talk to
19 all of you, I had some talking points from
20 NRCS, some talking points from NASS, some
21 talking points from AMS, and that is partly a
22 function of me, because I said Barbara put

1 together some great talking points for me. I
2 said, okay, but there's this other thing, this
3 other thing. And, we really are at the point
4 in time when organic crosses all areas of
5 USDA.

6 Tom and I, on the drive over here,
7 we were talking about well, okay this is EQIP.
8 What's going on with CSP? What are the
9 opportunities there, the Conservation and
10 Stewardship program, the Conservation and
11 Security program, and so, I guess, some of
12 that has really got to fall at the level of
13 the Secretary or myself. And, particularly,
14 me in terms of being a sort of sustainability
15 coordinator to look across the agencies. And
16 I know, Michael, that was something that we
17 tried to do at the end of the Clinton
18 administration, when we put out the Final
19 Rule. We included a promissory note, if you
20 will, of items we wanted to say to organic
21 farmers and ranchers across the country, and
22 processors, it's not just here's the rule, and

1 how we're going to enforce it. But, here is
2 the menu of ways USDA can help you in your
3 efforts. And, so, I think that's sort of the
4 orientation I come to the job with.

5 I don't know exactly how to
6 conquer the stovepipe organizational barriers
7 that every kind of large organization has, but
8 that at least gives you a sense of my mindset.
9 Katherine?

10 CHAIRMAN MOYER: Just a minute,
11 Valerie. We have a question from the Board.

12 MEMBER SMILLIE: Well, I'm
13 following up with what Michael is saying.
14 We're seeing difficulty in the coordination
15 between FDA and USDA, and any help on that
16 area would be gratefully accepted.

17 The other issue that's come up is
18 how we're going to interact with all the food
19 safety initiatives. And I just wonder --
20 there's a lot of talk about getting those all
21 together under one roof. And I'd like to hear
22 your views on the interface between

1 sustainability, and organic farming, and some
2 of the food safety issues that have arisen
3 lately.

4 DEPUTY SECRETARY MERRIGAN: Well,
5 I haven't yet engaged in the food safety
6 issues. I'm getting briefed this week from
7 staff in terms of what's gone on in this
8 administration before I walked in the door, so
9 it's a bit premature for me to comment much.
10 But I will say just being on the Internet,
11 there is a lot of hysteria over different
12 legislation that I don't think was necessarily
13 fact-based. And I just caution everybody in
14 a highly volatile public arena that we check
15 facts, and carefully navigate those waters,
16 because your credibility is everything in
17 Washington, and anywhere. Right? And, so,
18 you don't want to lose that. And when the
19 organic voice is brought into that debate, we
20 want to make sure it's well researched and
21 strategic.

22 MS. DiMATTEO: Katherine DiMatteo,

1 and this hat that I'll wear with this question
2 is my IFOOAM hat, International Federation of
3 Organic Agriculture Movements. And I just
4 wondered if there -- if you see that there
5 could be more discussion from the Secretary's
6 office at Secretary's levels, and colleagues
7 in other countries, on organic, and the issues
8 of organic development, and mutual support,
9 equivalency and harmonization.

10 I know that for an agriculture
11 service, and, of course, USTR takes the lead
12 on most of those international discussions,
13 and on trade issues, but when I was on APAC
14 many years back, that there were issues that
15 were discussed out of the Secretary's office.
16 And I just hope and wonder, from your point of
17 view, if organic can be some of those issues
18 that get talked about, and are represented by
19 the Secretary's office and, perhaps, yourself
20 in the international community.

21 DEPUTY SECRETARY MERRIGAN: I,
22 perhaps, see a Merrigan Worldwide Tour in my

1 future.

2 (Laughter.)

3 DEPUTY SECRETARY MERRIGAN: No.

4 Absolutely. I take your point, Katherine. I
5 think that there's still a lot of standards
6 work that the NOSB needs to work on, and there
7 will always be. I mean, we always are going
8 to have petitions about materials, and there's
9 still a lot of areas of the rule that can be
10 fleshed out, either through specific rules, or
11 guidance, and that sort of thing. But if I
12 had to sort of look to the future, I'd say
13 we're entering the era of enforcement and
14 equivalency. So, it's about how are we going
15 to facilitate global trade, and make sure that
16 what's coming into this country as organic, is
17 really organic. And what we're sending
18 forward is the same. I think that we're
19 coming closest on agreements with the
20 Canadians, and I think that's exciting,
21 assuming the rule is done. So, anyhow, I
22 think that that's the era we're in. And I

1 also think that this is now -- first you don't
2 want to come down hard on people when a new
3 rule has been birthed, but 2002, 2009, it's
4 time.

5 CHAIRMAN MOYER: We have a
6 question, Valerie, from Board Member Kevin
7 Engelbert, if you don't mind.

8 MEMBER ENGELBERT: Thank you for
9 coming. I appreciate the notice on the EQIP
10 program for organic farmers. I think there's
11 a potential for that to do a lot of good,
12 especially if it's available for farmers that
13 are transitioning to organic. Many of the
14 organic farmers already have made all those
15 changes in their operation to become
16 certified.

17 My concern since I've been on the
18 Board is that the National Organic program has
19 always been the ugly stepchild since its
20 inception. And with the growth in the organic
21 industry, the Board is continuing to deal with
22 new things from pet food, to now cosmetics,

1 and aquaculture. I'm wondering if there's any
2 possibility, given the chance that it might be
3 a stand-alone program, to dramatically
4 increase the funding to the program. Because,
5 in spite of the extreme confidence and hard
6 work of the people on the Board, or on the
7 program, I'm concerned it's just going to
8 continue to fall behind with the work that
9 needs to be done, because of the lack of the
10 funding in previous years.

11 DEPUTY SECRETARY MERRIGAN: Yes.
12 I hear what you're saying, and certainly, when
13 I came in as AMS administrator and the rule
14 had just sort of got stuck, and I was brought
15 in to help rewrite it, I found that there was
16 a band, a very small number of program staff
17 people working around the clock in a very
18 unsustainable, unhealthy way. And being
19 beaten up, frankly, by the organic community
20 in ways that oftentimes were very unfair. But
21 everyone was frustrated, inside and outside
22 the building, about what was going on. And,

1 so, as AMS administrator, I had the power to
2 just cherry-pick people from other parts of
3 AMS to augment the staff, to make that rule-
4 making process happen.

5 I know Barbara wasn't involved in
6 the program then, but, Barbara, I think I got
7 you to write some piece of that rule. One of
8 those OMB -- I don't know what it was -- or
9 you rewrote it, probably, because Barbara is
10 a great writer. And, Mark, did I get you
11 involved? You were in Fruit and Vegetable.
12 No, you were in Livestock and Seed, so you
13 were involved in the accreditation portion.
14 Okay. So there are other people in other
15 parts of the Department I just sort of pulled
16 -- some of them landed here, eventually, but
17 I pulled -- and I think -- I mean, that's
18 something to think about. And that's
19 something I need to talk to Barbara in more
20 detail about.

21 Everybody wants more money for
22 their things. And now, as Deputy, I'm in

1 charge of the budget. USDA this year has a
2 budget of \$120 billion. We have somewhere
3 between 104-- and 120,000 employees, depending
4 how you count. I have a really hard time
5 going up to Congress and saying, we need more
6 money. I'd much prefer to look at what our
7 allocations are, and figure about how can we
8 restructure, and make things work. And how
9 can we task people with multiple objectives,
10 and create teams so things work?

11 That said, I think that just the
12 announcement that the NOP is at the point
13 where it needs to stand on its own in a
14 different way, may mean that there's some
15 reallocation there. I can't make any
16 promises. But I think that we all have to
17 understand that this is a horrible time for
18 the economy, and people are losing their jobs.
19 And I'm going to be very hesitant to be making
20 a lot of Hill visits talking about more money.
21 Yes, Marty.

22 MR. MESH: You don't have to talk

1 about more money. What about just parity,
2 market sharing the problems that organic has.
3 We've been saying the same thing for research
4 funding for a while. You said something about
5 a hundred and something billion dollars? If
6 organic had just whatever that, four to five,
7 if you include farmers' market, direct
8 marketing, and 6 percent of that, I think we
9 could make it work.

10 DEPUTY SECRETARY MERRIGAN: Yes, I
11 should be care. The \$120 billion is this
12 year. That's rolling in the stimulus funds.
13 Normally, USDA operations are just a mere \$95
14 billion a year. My husband won't even let me
15 use our checkbook. He doesn't trust me.

16 (Laughter.)

17 DEPUTY SECRETARY MERRIGAN: So,
18 anyhow, things change. I understand, and I've
19 made those parity arguments, Marty. And I
20 will continue to make them internally. But
21 what I'm saying is there -- and after saying
22 animal welfare is important, I hope you

1 forgive this expression, but there many ways
2 to skin the cat.

3 (Laughter.)

4 PARTICIPANT: Welcome from
5 Massachusetts, which you chose to leave to
6 come to this beautiful city.

7 DEPUTY SECRETARY MERRIGAN: Good
8 to see you, Ed.

9 PARTICIPANT: Yes. Ed Moltby,
10 NOPA. Just to give you some priority, the
11 Access to Pasture Rule, as you probably know,
12 is being --

13 DEPUTY SECRETARY MERRIGAN: I've
14 heard of that.

15 PARTICIPANT: Yes. Good. And the
16 Replacement Rule, you've heard of that one.
17 And whatever you can do to push it through the
18 different departments of review. And I had
19 suggested yesterday that Rick should go back
20 under overtime, and should do -- pull a few
21 all-nighters. I will bring the food to his
22 office, and advise him whenever he wants.

1 (Laughter.)

2 PARTICIPANT: But just whatever
3 you can do from the point of view of all these
4 rules and regulations to guide him through the
5 various departments of review in USDA.
6 Organic milk, we've got farmers who are in the
7 same position as conventional dairy farmers
8 now, who are losing money, who are going out
9 of organic. And the quicker we can speed up
10 some of these processes would encourage more
11 livestock farmers to transition. Thanks.

12 DEPUTY SECRETARY MERRIGAN: Fair
13 enough. I know that you've had a lot of
14 comments already. What's the number up to,
15 Barbara?

16 MS. ROBINSON: Around nineteen
17 thousand.

18 DEPUTY SECRETARY MERRIGAN:
19 Nineteen thousand and counting, whatever.
20 Nineteen thousand is a lot. We'll try to do
21 the best we can. And one thing I certainly am
22 committed to, as is the staff, is to make our

1 decisions fully transparent. I mean, I think
2 that the organic rule-making process that we
3 did under my watch in AMS, I'm very proud of,
4 because a lot of the decisions we made you may
5 not have agreed with, but I think we set up a
6 way where we articulated our rationale in the
7 preamble to the rule, so you knew where we
8 were coming from. You knew the areas where we
9 thought there might be a need for evolutionary
10 thinking. Now, it's like, this is where we're
11 at now, but we understand there's a whole --
12 or there may be future specifics that will be
13 added on to this.

14 I think that's really important,
15 and it's our responsibility in our shoes at
16 USDA to use the rule-making process, not just
17 to dictate the rules of the land, but to
18 establish a dialogue with the affected
19 communities so they understand what it is
20 we're hearing, and why we're acting the way we
21 are. And sometimes you all may say one thing,
22 and do something else, but the onus is on us

1 to explain that, and to provide the rationale.
2 And to give you enough information to sink us,
3 if you need it. I mean, that's our job. We
4 need to provide it.

5 CHAIRMAN MOYER: Kathleen, we have
6 a question from Board Member Jennifer Hall.

7 MEMBER HALL: Hi. Thanks for
8 being here. I am thrilled that you're an ally
9 of the Animal Welfare topics. And I'm curious
10 where you might see a fit for not just as it
11 pertains to organic, but where it pertains to
12 the full gamut of animal production in all of
13 agriculture here, and industrialized
14 production. And where USDA might partner more
15 with EPA to enforce the laws that already
16 exist on the pollution violations that are
17 chronic in that arena as a means of -- taking
18 it from another angle, as well, and not having
19 to create new law to still achieve really good
20 objectives about animal welfare, and how all
21 of that food is produced.

22 DEPUTY SECRETARY MERRIGAN: Well,

1 part of my job -- it's a really cool part of
2 the job, actually -- is I get to go to the
3 White House quite a bit. I was in a Cabinet-
4 level meeting yesterday. I mean, I sat around
5 the table with, I think there were eight
6 Cabinet Secretaries there, the head of the FBI
7 was to my right. You know, if you get through
8 the vetting process, I mean, I think the FBI
9 investigated me six or seven weeks -- I wanted
10 to say to them, what do you know about me that
11 I don't?

12 (Laughter.)

13 DEPUTY SECRETARY MERRIGAN: So the
14 part of having that kind of seat at the table
15 means be able to reach across departments and
16 agencies and say, what about this? So,
17 yesterday I was also sitting next to David
18 Hays, who is the designee for Deputy Secretary
19 of Interior. We've got a lot of common
20 issues, as it relates to forested land in this
21 country, and BLM land, and grazing, and all of
22 that. I said, "Let's have lunch." And the

1 same way, I hope to establish a relationship
2 with our new EPA Administrator, so where that
3 all falls out, I don't know. But, I guess
4 that's part of my job, is to help facilitate
5 those conversations.

6 I think animal agriculture in this
7 country is reeling from Proposition 2 in
8 California. And when I spoke at a dinner
9 meeting a couple of weeks ago in front of the
10 National Meat Association, I said, "This is a
11 wake-up call. I think it's really important
12 as you develop standards in animal welfare,
13 that you continue the track that we all
14 decided to set 25 years ago or more, where you
15 don't disparage other production systems, but
16 you say we're trying to establish a market
17 that's distinct, and that consumers are
18 demanding. And we're going to clearly
19 articulate our standards and label for that,
20 and then just see what happens. But I imagine
21 what you do will have an impact on the rest of
22 agriculture, just as we've seen on the crop

1 side.

2 I always say that organic farmers
3 are some of our most under-valued, and
4 certainly not rewarded researchers.

5 (Applause.)

6 DEPUTY SECRETARY MERRIGAN: Tom,
7 tell them about that part of EQIP. They
8 should know. You remember we were talking in
9 the car. You have to come to the mic, though.
10 You have to be recorded for posterity.

11 PARTICIPANT: I'm sorry. The
12 component of EQIP?

13 DEPUTY SECRETARY MERRIGAN: You
14 know, the competitive grant part.

15 PARTICIPANT: Oh, I'm sorry. Yes.
16 Yes, in EQIP we have Conservation Innovation
17 Grants. It's funded typically at the national
18 level, about \$20 million per year. The main
19 purpose is to work with producers on their
20 farm on innovative conservation practices, or
21 approaches to conservation. And we're in the
22 selection process for this year's grants right

1 now.

2 DEPUTY SECRETARY MERRIGAN: So,
3 part of it -- part of what I'm going to be
4 doing is -- for not just organic, but for our
5 initiatives, we used to call it local foods --
6 but now we say, the Secretary would start it
7 out by saying, "Buy Fresh, Buy Local", and he
8 was told that's a copyright or a trademark
9 thing -- so now we say, "Know Your Farmer,
10 Know Your Food", which I actually like better,
11 because I think it's more inclusive, because
12 sometimes the local stuff, the local ward
13 stuff is a little over the edge for me. So,
14 I think this is going to be great. But
15 anything to do in the sustainability world,
16 this is what I'm going to be mentally doing
17 every day that I'm in the job, is sort of
18 cataloguing opportunities, and making sure
19 people hear about them. So, just talking
20 about that on the ride over, it was like oh,
21 you know what, I've done a lot of research on
22 the EQIP program, but somehow that one just

1 went over my head, and I need to learn more
2 about that. So, now it can be on your
3 homework list, too.

4 PARTICIPANT: From Consumers
5 Union.

6 DEPUTY SECRETARY MERRIGAN: Old,
7 but not senile -- yet.

8 (Laughter.)

9 PARTICIPANT: I have two questions
10 for you. The first one is about your
11 perspective on consistency in this program.
12 As new products are considered, whether it's
13 aquaculture, personal care, the standards that
14 they have to meet currently on the market sort
15 of languish behind what the food standards
16 are. And consumers are confused, at the
17 least, and feeling misled and deceived, at the
18 worst. And, so, I'm wondering about your
19 perspective on consistency of the application
20 of the bar to various products, because
21 there's a lot of debate about that. And
22 whether you pull the bar down so that you can

1 increase market capture across new product
2 sectors, or you keep the bar consistent with
3 what other organic products have to meet, and
4 create an incentive for the market in that
5 respect to meet a high bar. So, that's my
6 first question.

7 And my second question has to do
8 with other labels under USDA that are also
9 very confusing, like the "Naturally Raised",
10 like the discussions around natural. And I'd
11 just like to hear your perspective on the
12 incubation of those label standards, and
13 making sure that they have similar rigor, or
14 some rigor to them in terms of not misleading
15 the public.

16 DEPUTY SECRETARY MERRIGAN: I love
17 labeling issues, generally, I'll say that.
18 And not just the labeling issues that you may
19 have right now, Consumers Union might have on
20 their plate, but I met with Chairman Joseph
21 Brings Plenty on the inauguration of the
22 People's Garden. He gave a traditional

1 blessing, that was from the LaCota tribe, I
2 believe. And gave us a story, and song in his
3 native tongue, which was really -- it was
4 really quite lovely, because the Native
5 Americans are the first farmers of this
6 country. It was really quite moving, I
7 thought. And he brought the issue of some of
8 the rice that the Indians were producing, and
9 how other companies who had no association
10 with that kind of rice, were using the label,
11 anyhow. And, so, I have a feeling. just given
12 my history in labeling and consumer right-to-
13 know, that a lot of these issues are going to
14 end up on my desk. I think it's premature to
15 talk about that whole host of labeling issues
16 that are before the department. I'm aware of
17 it, and I haven't gotten into it yet.

18 You're probably not going to like
19 my answer on your first question in terms of
20 pet care, natural care, because in some ways,
21 things have moved beyond the Kathleen Merrigan
22 stage of writing the law. But when we were

1 writing the law, was there, again, a Food
2 Production Act? And I guess I wasn't really
3 thinking about food for pets. I mean, that is
4 food, and there's certainly a lot of
5 implications for sustainability, particularly
6 around seafood, I think, when it comes to pet
7 food. But I certainly never thought about
8 cosmetics, because there was already a whole
9 lot of stuff out in the marketplace that was
10 labeled organic that was fairly meaningless at
11 the time we were drafting the legislation.
12 And that just wasn't in our scope.

13 In part, it was a jurisdictional
14 issue, because it wasn't clear -- some of
15 those issues would fall within the scope of
16 the Committee on Agriculture, Nutrition, and
17 Forestry, and part we just chose not to do it
18 for whatever reason. Some of you in this room
19 were with me in those meetings when we talked
20 this all out. But time has moved on beyond my
21 input in that, so I don't have in my heart of
22 hearts strong feelings that I can articulate

1 here today about natural care products, to
2 tell you the truth. I probably could use
3 some, I know that, but beyond that, I'm not
4 ready to weigh in.

5 Okay. A couple of more questions,
6 and then I'll head out. A compound one. Yes,
7 Marty. Come on.

8 PARTICIPANT: An idea for you with
9 your sustainability network role in your new
10 job, I'd urge you, I've emailed you already,
11 but I'd like to share it with all the people
12 here, is to bring Secretary Vilsack out to
13 NAL, the National Agricultural Library, a good
14 person to pry away with that is Senator Tester
15 of Montana. He knows about you. I made sure
16 of that myself. He's our organic farmer in
17 the Senate. He's planting wheat. His people
18 are out there planting wheat while he's
19 dealing with the Senate.

20 The National Ag Library has a
21 terrific database in the alternative farming
22 system coordinated and directed by Bill

1 Thomas. Anybody with a computer here can go
2 on-line to the NAL@USDA website to the
3 alternative farming system, and access and
4 print out some terrific extensive
5 bibliographies on topics such as the history
6 of organics, food safety, food quality, the
7 enhanced nutritive value of organic foods.

8 Everybody here know about farm
9 parity, and we want to get library parity for
10 NAL. Senator Harkin knows about this. He lit
11 up when I told him about this at an
12 integrative medicine hearing a couple of
13 months back. We want to get NAL on parity in
14 the digital age with National Library of
15 Medicine. Med goes around the world, but if
16 we can get library parity with NLM for NAL, we
17 could revolutionize the whole USDA extension
18 system. Everybody has a computer, which in
19 the Internet age puts people right on the
20 frontier of their own understanding and
21 capacity. And we can do this through NAL,
22 which a subset of which is the Alternative

1 Farming System. So thanks for being here,
2 thanks for listening. God bless you.

3 DEPUTY SECRETARY MERRIGAN: Sure.
4 The National Ag Library is a great resource.
5 And certainly in my last eight years as a
6 Democrat in exile up in Massachusetts, as a
7 college professor I relied upon it a great
8 deal.

9 MR. HUTCHINSON: Tom Hutchinson
10 with the Organic Trade Association. Living
11 very near Beacon Field in beautiful
12 Greenfield, Massachusetts, where all the trees
13 are flowering at this very moment, and
14 similarly, this idea of sustainability seems
15 to be flowering. And it's very good to hear
16 you taking on that role in USDA.

17 I think everyone here has the
18 faith that organic would score high on any
19 sustainability scorecard. To increase that
20 confidence in our ecological production
21 management system, it would help to have more
22 fundamental research done on the energy use in

1 organic, the materials cycling issues, and
2 such. And with the new reorganization of REE,
3 I'm wondering whether or not there might be a
4 generally broader redirection of research
5 within USDA to deal with some of those issues
6 from which organic would certainly benefit.
7 And I think would benefit proportionally more
8 than other systems of agriculture that are not
9 used to thinking in those terms.

10 This also has to do with the
11 siloing question that Michael brought up, and
12 I also appreciate that. This is really an
13 opportunity to do a little bit more, and just
14 wondering your thoughts about how a general
15 shift in research.

16 One final point, I asked ERS, do
17 you know how much agricultural product in the
18 country is used for food, versus non-food
19 uses? And there was not an easy answer to
20 that. And as we move forward with more
21 consideration of agricultural products as
22 feedstock for our own civilization, the

1 sustainability question will be even greater.
2 So, basic research for sustainability I think
3 would proportionately benefit organic. Do you
4 see hope in that direction?

5 DEPUTY SECRETARY MERRIGAN: I

6 think Mark Lipson, who you probably all know
7 is one of my best friends, has done a really
8 great job watch-dogging, I mean, along with a
9 lot of you, but he's done a particularly great
10 job. It's taping me in some sort of crazy
11 way. I don't know what's going on there. But
12 he's done a really great job watch-dogging the
13 ag research side of the house, and trying to
14 point out opportunities for the Ag Research
15 Service, in particular, to move forward with
16 an organic agenda. And that network that OFRF
17 has developed of agricultural scientists and
18 extension agents score, to think about those
19 issues, I think has been really quite helpful.
20 I do think that there are going to be
21 increasing opportunities. This Farm Bill put
22 a lot of new emphasis on fruit and vegetables,

1 and I think that's an opportunity for organic.
2 I always argue the sustainable system has a
3 livestock component, too.

4 We have a confirmation hearing
5 tomorrow, and one of the four people up for a
6 job at USDA is our nominee to be Under
7 Secretary for REE, Rod Shaw, who comes from
8 the Gates Foundation. I think he's pretty
9 exciting. I think he's going to be an
10 innovator. And when I met him, I shook hands,
11 and I said, "We're going to do a lot of
12 creative things together." I think that's
13 going to be true.

14 CHAIRMAN MOYER: Kathleen, if you
15 have time for one more question, Board Member
16 Bea James.

17 DEPUTY SECRETARY MERRIGAN: Two
18 more questions.

19 CHAIRMAN MOYER: Okay. Bea James
20 has a question.

21 MEMBER JAMES: Thank you so much
22 for coming, and I just want to acknowledge

1 that you being here represents some of the
2 change that we're all excited about.

3 I represent the retail sector, and
4 I think one of the concerns that many
5 retailers have is the potential funding and
6 support for large agrifarms compared to some
7 of the smaller family farms that a lot of
8 retailers work directly with. And will the
9 Department find ways to keep small family
10 farms thriving, as we grow, and seek to feed
11 the demand for organic?

12 DEPUTY SECRETARY MERRIGAN: Well,
13 I guess it's just saying what you all know, is
14 the census shows us quite dramatically,
15 there's this upsurge of very small farm
16 operations, a lot of them focus on alternative
17 methods. A lot of them are women-led, which
18 I think is kind of cool. And then, there's
19 also a greater number of the larger scale
20 operations, and it's that -- Frank Kirschman
21 talks about all the time, that sort of started
22 the ball rolling, the disappearing middle that

1 we're all concerned about. A lot of those are
2 your small to moderate-size family farmers.

3 How do we throw a lifeline out to
4 them, whether they're organic, or following
5 other production methods, I think is certainly
6 something that Secretary Vilsack and I are
7 talking about regularly. You know, I
8 certainly -- again, to re-emphasize, the
9 President, one of the very things he said
10 about agriculture, and consistently said about
11 agriculture on the campaign trail, was that he
12 was very interested in revigorating local food
13 systems. And we know the First Lady has a
14 great interest in issues around healthy eating
15 for children. She's very concerned about, as
16 we all are, the obesity epidemic, and how it's
17 affecting children.

18 I don't know if you've been to the
19 White House garden yet, but it's in the most
20 highly visible spot. You know, when you see
21 the pictures of the White House, people are
22 lined up against that fence, and you see the

1 fountain there? Okay. The People's Garden is
2 right there where you can see it. And not
3 only that, they have something we don't have,
4 the First Lady's garden, they have something
5 we don't have at USDA, is they have a beehive,
6 pollinators right there, which I think is
7 great. But they're enclosed a little bit --
8 because we've got a lot of kids running around
9 the Mall -- and say, oh, that's cool. So, a
10 little bit different.

11 But he really talked about local
12 food systems, and so everyone is looking to me
13 and they say, cool, Kathleen, what are you
14 going to do? Whoa. That just is so
15 structurally challenging to the system that we
16 have in place. And if I want to do something
17 that's more than cosmetic, what is it? I
18 mean, one of the things I'm thinking about is
19 slaughter capacity, because that's, to me, a
20 real bottleneck in the system. But there are
21 definitely others. And I'm really interested,
22 if you want to write me a letter with your

1 best ideas about how I move forward in that
2 agenda, I'd certainly appreciate it.

3 PARTICIPANT: Very quick question.

4 With all the activity happening across the
5 USDA and other agencies as well -- RMA, FSA,
6 NRCS -- have you thought about having a
7 position within the USDA that coordinates --
8 someone who is the organic point person that
9 helps disseminate the information between
10 those energies, and helps coalesce that
11 information right there within the USDA,
12 between all the various agencies. Because,
13 sometimes, the NRCS doesn't always talk to the
14 FSA, and that sort of thing. So, have you
15 thought about that?

16 DEPUTY SECRETARY MERRIGAN: I've
17 thought about that, and it's certainly
18 something I advocated when I was on the
19 outside during the transition. I think to
20 some extent people think that's me at some
21 level, so I've got to make it such that -- I
22 mean, I know you guys would like a full-time

1 person doing that, and, certainly, I won't be
2 doing that full-time. But, actually, I have
3 a little bit of power, so it's not a bad
4 trade-off. So we'll see how things evolve.
5 You know, we'll see how things work over the
6 coming months.

7 MS. ROBINSON: I'm so happy to see
8 you there. Thank you, Kathleen.

9 DEPUTY SECRETARY MERRIGAN: All
10 right, guys. Have a good meeting.

11 (Applause.)

12 CHAIRMAN MOYER: At this time,
13 what we're going to do as a Board, because
14 there is a much needed break, we're going to
15 take a 15-minute break, and we will reconvene
16 at that point. Thank you for your kind
17 attention. That will be at about 10:20.

18 (Whereupon, the above-entitled
19 matter went off the record at 10:08 a.m. and
20 resumed at 10:22 a.m.)

21 CHAIR MOYER: Okay, if we could
22 quiet down in the back, we have a quorum of

1 the Board, and the Board is seated. We're
2 ready to go back into session, and we're going
3 to finish up with compliance, accreditation
4 and certification committee work, starting
5 with 100% label claim.

6 MEMBER HEINZE: Jeff.

7 CHAIR MOYER: Katrina.

8 MEMBER HEINZE: So I recognize
9 that Joe and Tracy are not here, but I believe
10 that they wanted to wrap up cosmetics real
11 quick.

12 CHAIR MOYER: Joe is in the room
13 now.

14 MEMBER HEINZE: So we may just
15 have to go back to that.

16 CHAIR MOYER: Personal care?

17 MEMBER HEINZE: Yes, they wanted
18 to wrap that up real quick.

19 CHAIR MOYER: Okay. Before we
20 jump into 100 percent label claim, Joe, are we
21 finished with personal body care standards?
22 Or do you have something you need to wrap up

1 on that?

2 MEMBER SMILLIE: We are not
3 finished, but we are ended for today.

4 CHAIR MOYER: Okay, thank you
5 very much.

6 Julie, if you are prepared with
7 100 percent claim, we'll start on that.

8 THE 100 PERCENT LABEL CLAIM

9 SECRETARY WEISMAN: This is
10 actually something that is also on the agenda
11 at this spring meeting as a discussion
12 document. And I think that we introduced this
13 -- Joe, correct me if I'm wrong -- we
14 introduced this initially last fall?

15 MEMBER SMILLIE: Yes.

16 SECRETARY WEISMAN: Or before
17 that? Okay, it was last fall. And it was
18 carried over from then --

19 MEMBER SMILLIE: It was last
20 spring, actually?

21 SECRETARY WEISMAN: It was a year
22 ago? Okay. So the issue came up because

1 certifiers were being required to make
2 decisions that were costly to manufacturers
3 regarding whether they can make a 100 percent
4 claim on their retail labels based on the use
5 of inert atmospheric gases, in other words
6 gases that are part of our atmosphere anyway,
7 in what was called modified atmospheric
8 packaging.

9 And so what this -- what the
10 recommendation document tries to do, or the
11 discussion document, is lay out the history of
12 why that was a practice that had been going on
13 for some time. It was -- certifiers were
14 required to change it following clarification
15 at certifier trainings; that the program's
16 interpretation, based on all their
17 consultations, was that that voids a claim of
18 100 percent organic.

19 What -- and we were actually asked
20 by the program then to clarify that -- to try
21 and give some guidance and clarify that
22 situation.

1 And so the -- I think the short
2 story on this discussion as it's encapsulated
3 in this document is that CAC reviewed the
4 regulatory language in 7 CFR in OFPA. Also we
5 went back to 21 CFR to look at -- and other
6 parts of the FDA regulations to look at
7 definitions of food additives, ingredients,
8 packaging aids, various definitions. And we
9 purposely made a document that was focused
10 very narrowly on this issue of packaging aids.
11 And we came to the conclusion that the use of
12 modified atmosphere packaging was not an
13 ingredient; was not a processing aid; and that
14 it should not negate a claim of 100 percent.

15 We had some modest comment on this
16 recommendation. I don't mean modest, I just
17 mean in terms of numbers of comments, compared
18 to other things, the volume of comments on
19 other things that we are going to be talking
20 about at this meeting. And really there were
21 actually three comments that were specifically
22 about the 100 percent claim, and then there

1 were some other discussions of this
2 recommendation embedded in some of the
3 multiple topics.

4 But two of the three people that
5 specifically commented about the use of inert
6 gases in 100 percent labeled retail products
7 were food manufacturers -- I think one was an
8 oil manufacturer and one was a coffee
9 manufacturer -- and so they supported this
10 recommendation.

11 We also had in comments given by
12 some of the certifiers particularly, a more
13 broad request and questioning of the idea that
14 there should even be a 100 percent labeling
15 category. And we agree that that query has
16 merit, but that was not intended to be the
17 scope of this document, and I'm not even sure
18 if it could appropriately be the purview of
19 solely the CAC.

20 I think that question would have
21 to be taken up either by a different committee
22 or a joint committee would have to be convened

1 for that.

2 The other question that a lot of
3 commenters have wanted to pull in and have
4 requested that our deliberation on this
5 subject include is a whole comprehensive look
6 at all of food contact substance issues that
7 take place post-harvest. That was certainly -
8 - and that is also not something that the CAC
9 by itself would ever attempt to address.

10 So that being said we continue to
11 present this to the rest of the board as a
12 very narrowly focused document only on the
13 topic of modified atmosphere packaging or
14 inert gases in 100 percent labeled retail
15 products.

16 MEMBER DeMURI: What about the
17 use of these inert gases as overpressure? For
18 instance nitrogen is used quite often in
19 vessels in aseptic processing as overpressure
20 to maintain sterility of those products.
21 Would you consider including that as part of
22 this document, or would this just be for the

1 packaging part of it?

2 SECRETARY WEISMAN: I think we
3 really were envisioning what goes in a final
4 retail package, and what comes into contact
5 with the food product that the consumer is
6 going to eat. And we were really trying to
7 make a line between -- you know, that there is
8 a section that is post-harvest and pre-final
9 packaging that we didn't really feel like it
10 was -- I mean that is almost more of I think
11 probably a handling issue.

12 MEMBER SMILLIE: Even though I
13 see your point, Steve, it would have to be
14 looked at as a processing aid, and the way we
15 look at nitrogen in the packaging thing is,
16 it's not a processing aid per FDA and CFRs,
17 it's a packaging aid. So hence we believe it
18 could carry the 100 percent, whereas if you
19 are talking about it used in processing you
20 would have to look at it as a processing aid,
21 and hence it would remove that product from
22 100 percent claim.

1 SECRETARY WEISMAN: And I also
2 want to remind everybody that this is not a
3 voting item at this meeting. So whatever you
4 want to have be discussed as part of a public
5 discourse, I encourage people to ask their
6 questions now, not that I want to prolong
7 today's agenda.

8 MEMBER GIACOMINI: Just one quick
9 thing. I was a bit -- when we were talking
10 about the 100 percent document, I was not
11 aware of what the document was actually about.
12 So maybe next time when we continue on this,
13 focus on the atmospheric gas side of it rather
14 than the 100 percent claims, which has a whole
15 other discussion area.

16 SECRETARY WEISMAN: Yes, and I
17 would like to apologize, because there was a
18 point where we did change the name of the
19 document to inert atmospheric gases, and
20 somehow it still lived on in the agenda as 100
21 percent, and I'm sorry that we didn't catch
22 that.

1 MS. FRANCES: It's in the notice
2 that way, when you approved the naming of this
3 document at that time. I think you were still
4 thinking it was going to be a recommendation.

5 CHAIR MOYER: Anything else, Mr.
6 Chairman, for the compliance, accreditation
7 and certification committee? Do you have
8 anything else?

9 MEMBER SMILLIE: Nope, that's it.

10 CHAIR MOYER: Okay, thank you.

11 Before we move on to the next
12 committee report, I want to mention that we
13 are off schedule a little bit as you are all
14 aware. We will do our best to work toward a
15 slightly new agenda. We are off between 45
16 minutes to an hour. We are going to work
17 towards that. We will make sure that we have
18 time for public comment at the end of the day
19 like we had planned.

20 However I did take the opportunity
21 of working with Mark to set up a time for us
22 as a board to meet with the deputy secretary

1 at 7:30. We have a time slot as a board to go
2 over there and meet with Kathleen. So
3 hopefully we will get done in time to do that,
4 and we certainly hope that the public will
5 allow us to get done. We need to get out of
6 here around 6:30 to take the Metro a few stops
7 down to meet with Kathleen. So that's where
8 we're at as a board.

9 Valerie, do you have a comment?

10 MS. FRANCES: And just to add a
11 note that pretty much everyone that signed up
12 for public comment this afternoon are
13 commenting on discussion documents. And
14 nothing is on the table for being voted on
15 with the exception of the two growers that
16 missed yesterday and want to speak a little
17 bit today on sulphurous acid. And those
18 really are the two. And I think one other
19 person wants to address some of the petition
20 materials, but it's not detailed in their sign
21 up what those are.

22 CHAIR MOYER: Thank you, Valerie,

1 that's a good point. And I should also point
2 out that if you want to submit written comment
3 the program has agreed to give you a few weeks
4 to get something in to Valerie in writing if
5 you don't get a chance or don't feel you got
6 a chance to get all of your verbal comments
7 out here today. And if you could just be
8 considerate of the Board's need to get out of
9 here by 6:30, we certainly do appreciate that.

10 Okay, moving on, Joint Crops and
11 Compliance Accreditation and Certification
12 Committee on Biodiversity.

13 I'm not sure, Tina, are you
14 starting, or Joe?

15 MEMBER SMILLIE: Well, actually
16 Tina and I are going to let the progenitor --
17 no, that's the wrong word -- but the person
18 responsible for the document take the lead on
19 this.

20 CHAIR MOYER: Thank you very
21 much.

22 JOINT CROPS AND COMPLIANCE ACCREDITATION AND

1 CERTIFICATION COMMITTEE ON BIODIVERSITY

2 MEMBER FLAMM: That's almost as
3 bad an introduction as I gave Valerie, Joe.

4 (Laughter)

5 But we did have a terrific
6 introduction to this subject by our new deputy
7 secretary, and it was wonderful to hear her
8 endorse so strongly biodiversity conservation.

9 And she also -- I addressed issues
10 that they faced during the writing of the
11 regulations, and they are still around today;
12 they still haven't been solved.

13 I also appreciated her comment on
14 the perfect is the enemy of the good. And one
15 of the commenters on the biodiversity paper
16 made the exact same comment. A colleague of
17 mine from Montana, Becky Weed, who has a
18 predator-friendly farm, and in her supportive
19 comments she concluded with the very same
20 line.

21 The joint committee is presenting
22 a recommendation for a guidance document, and

1 not any regulatory change. And I think the
2 terms recommendation and guidance has led to
3 some confusion among at least one commenter.
4 But I don't know if there is any question
5 among the Board about what this is about.

6 But in any case it's our guidance
7 document rather than any kind of
8 recommendation for regulation. So I hope that
9 is clear.

10 The -- I think this whole process
11 is evolutionary. It certainly goes way back
12 in organic thinking. But it is incorporated
13 in the regulations, and is incorporated in
14 much action by the Board over the years, going
15 back to 2001, and something I had missed, and
16 Jim Riddle had pointed out, action taken by
17 the Board at that time.

18 In 2000 -- but guidance statements
19 were made by the Board on biodiversity
20 conservation implementation, both in 2004,
21 2006.

22 So the objective of this

1 recommendation is really to implement what has
2 been agreed to in the past. It really is not
3 so much new policy, or you might say no new
4 policy. It's just trying to get a framework
5 for moving forward and getting everybody on
6 the organic team from -- to share in the -- I
7 would like to say the glory of implementing
8 biodiversity conservation.

9 We are all so deeply involved in
10 this subject, myself my whole life has been in
11 natural resource management, biodiversity
12 conservation, organic farming. My
13 undergraduate in forestry, and a Ph.D. in
14 biodiversity conservation is what my Ph.D. is
15 in. So I've been really wrapped up in this.
16 I have a lot of -- excuse me if I show too
17 much passion for the subject, but it is
18 something I personally care about deeply, and
19 everybody in this room does. I think the
20 comments we got all show that everybody
21 recognizes both the need and the concern for
22 it. We wouldn't even -- there wouldn't be

1 agriculture at all if it wasn't for
2 biodiversity, and there wouldn't be -- we
3 wouldn't even have life without biodiversity.

4 There is a tendency sometimes when
5 we are talking about it for people to think
6 about just the pretty little things that we
7 all love, the pretty birds and so forth, being
8 the biodiversity. But actually most
9 biodiversity is every form of life. It's at
10 three levels which is often neglected:
11 ecosystem diversity; then species diversity
12 which people mostly think of; and genetic
13 diversity which is extremely important, and
14 particularly important in agriculture.

15 But we also forget about what's below
16 what -- what we don't see below ground. That
17 is critical. In fact there is probably more,
18 in numbers, there is more biodiversity at the
19 microscopic level than there is at the macro
20 level.

21 But anyway we can't have
22 sustainable agriculture without maintaining

1 biodiversity, and I think everybody here knows
2 that.

3 Just to repeat now what is said in
4 the rule, that the use of conserve establishes
5 that the producer must initiate practices,
6 support biodiversity and avoid to the extent
7 possible any activities which diminish it.
8 That's in the regs.

9 Moving on, in implementing this
10 there has been much work done by lots of
11 different people. But I particularly want to
12 give credit to great work that the Wild Farm
13 Alliance has done in terms of their
14 publication, and trying to provide farmers and
15 certifiers tools to help move this along in a
16 practical way.

17 In our -- in the recommendation
18 however we view these things as tools, and not
19 as iron clad -- they are not regulations that
20 you have to follow. They are tools, and
21 people can substitute their own tools.

22 I think just to piece -- you

1 remember a year ago is when in fact it was
2 Lynn Cody that made a fine presentation that
3 urged the -- asked the Board to revisit
4 biodiversity because she and the Wild Farm
5 Alliance felt that the program and us hadn't
6 followed up on it. And the Board at that time
7 directed the joint committee to look into it,
8 determine whether something needed to be done.

9 The joint committee determined
10 there was -- a discussion paper was sent out.
11 It was -- got about 60 comments, all of which
12 were supported with some good ideas. And to
13 the extent possible those comments were
14 included in the revised discussion paper.

15 Let me just summarize. The
16 guidance really approaches it in three ways I
17 think. To achieve the goals of improved
18 biodiversity conservation, number one, the
19 most important, is to increase education and
20 information. I think that is where the focus
21 needs to be, on learning by farmers,
22 inspectors and certifiers, and trying to get

1 uniformity in the inspection and certification
2 process. I think that is real high on the
3 list.

4 And then the second group includes
5 biodiversity in the accreditation audits. And
6 make sure this is addressed when certifying
7 agencies are audited.

8 And then thirdly is the area of
9 when we review materials, which can have, of
10 course, an effect on the environment. We all
11 looked at that. But more specifically to look
12 at criteria, so that when we review the
13 materials that we consider biodiversity. So
14 those are sort of the three categories.

15 So in the -- I think if I counted
16 right we received 53 comments on the
17 recommendation that is before you now. I
18 think it's fair to say that there was --
19 everybody supports conserving biodiversity.
20 Many of the commenters supported the
21 recommendation that was presented, as
22 presented.

1 As you heard yesterday one concern
2 that was initially expressed by -- I have
3 this, CAC, Certified -- give me the right
4 initials, Joe - ACA, I knew I had it out of
5 order, thank you. That's the reason I had
6 that glossary of acronyms. (Laughter) I
7 should have it in front of me right now.

8 They supported all the
9 recommendations that are in there. But in
10 their -- they were the ones that raised the
11 confusion about guidance and recommendation.
12 But also the terminology that -- the term,
13 natural resources, was a more familiar term to
14 farmers than biodiversity. And they actually
15 urged a de-emphasis of the use of that term.

16 And you heard yesterday that the
17 California certification agency supported that
18 part, while strongly supporting biodiversity
19 conservation. All of them did not -- but that
20 was one issue.

21 The other was, there was some, at
22 least one commenter commented on the criteria

1 checklist. And that was something that we
2 kicked around quite a bit in the committee on
3 how to best incorporate biodiversity and what
4 language to use in the criteria checklist.
5 Some probably thought it was too general and
6 others I know we had some who thought it was
7 not general enough.

8 But as it stands now biodiversity
9 is inserted in the criteria in a couple of
10 places about the same way as the environment.
11 So it takes a lot of judgment by whoever is
12 reviewing it. It's not a cookie-cutter kind
13 of thing. It takes as almost all the criteria
14 review does.

15 So that essentially you have --
16 leave the recommendations up there now.
17 That's recommendation one on the materials
18 review portion, and it shows in the section
19 you can see there, and biodiversity. And it
20 was in several other places. The comments at
21 the committee level caused some of them to be
22 changed and deleted.

1 Then go I think the next place
2 it's at is on the third sheet. Let's see, is
3 it compatible with organic production
4 practices? And it's included there, very
5 general.

6 The second part is to develop
7 implementation, the organic systems plan.
8 Again each certifier and grower and producer,
9 they are given a -- each given a role. You
10 see that up there. I don't know if I should
11 take the time to read that, the highlights.
12 I think one of the things that was added that
13 came out of the reviews and discussion was the
14 issue of conversion of, virgin land you might
15 say, to organic production, rather than going
16 from farmland and transitioning from farmland
17 to organic production.

18 And the language that was added
19 was conversion of native habitat to crop
20 production has consequences for biodiversity
21 that must be considered, and producers should
22 discuss such planned conversion with his or

1 her certifier before action is taken. This is
2 going to take a lot of judgment, and it is
3 kind of -- certainly a difficult issue but a
4 very important one, and we didn't want that
5 overlooked.

6 Inspectors, a lot of the emphasis
7 here is on training. And in -- with the
8 certifiers, it's having the certifiers look to
9 see what kind of progress farmers, producers,
10 are making. Are they thinking about and
11 including -- and each place is going to be
12 different. And I have to say, there are
13 several different templates or plans out
14 there. But I think the work that people at
15 ATTRA and the Wild Farm Alliance, they've got
16 good guidelines that really help to think
17 about it when you are out there.

18 Then finally the NOP looks at
19 biodiversity when they do their audits.

20 I think I'll take questions now,
21 Mr. Chairman.

22 CHAIR MOYER: Why don't you do

1 it?

2 MEMBER FLAMM: Or I guess -- I
3 can do it. Yes, Katrina.

4 MEMBER HEINZE: You mentioned
5 several times, and so I'm glad to hear it, the
6 need for judgment that is created by your
7 recommendation. And to be honest I'm really
8 concerned about that. As an industry we don't
9 have a great track record of consistency in
10 our judgment. And just like every other
11 commenter, obviously we support -- I support
12 biodiversity and the goals. And I get that we
13 don't want the perfect to be the enemy of the
14 good. And so I'm struggling with that.

15 But as I look -- and actually I'll
16 start with your recommendation about
17 converting native habitat to cropland. Later
18 on you talk about certifiers, and I'll find
19 the language, you talk about certifiers should
20 document the degree to which producers are
21 addressing this, and only severe violations
22 would lead to suspension or revocation.

1 So where is the guidance that
2 would help the certifier decide that
3 converting native -- you know, natural habitat
4 to cropland is not or is a severe violation?

5 So I worry about the details. And
6 I'm wondering how you envision providing that
7 guidance and ensuring consistency. I see it
8 as well in the material criteria where you
9 talk about -- how does it affect biodiversity
10 I think is the question you provide. Is the
11 substance harmful to biodiversity?

12 So if you look at a literal and
13 strict interpretation, you could imagine
14 eliminating a lot of material that folks are
15 using today, vinegar and soap-based natural
16 herbicides. They reduce plant biodiversity.
17 They are plants we don't want there. And
18 clearly we're going to use those materials.
19 But who is to say that some certifier isn't
20 later going to decide that that is not harmful
21 to biodiversity?

22 So we totally get that we want to

1 increase biodiversity, but it's that
2 consistency of judgment that I think is a very
3 hard to encourage, and like I said we don't
4 have a good track record.

5 So I'm wondering how you would
6 envision getting to that consistency on
7 something where judgment is incredibly
8 difficult and very gray.

9 MEMBER FLAMM: Jeff, would you
10 like to say something before I respond?

11 CHAIR MOYER: Yes, I just wanted
12 to address Katrina's comment a little bit
13 about materials. Materials is just one piece
14 of what would be looked at under this
15 guidance. And certainly if you are going to
16 use one of the materials that you mentioned,
17 what are you doing to mitigate that problem or
18 to enhance biodiversity in some other aspect
19 of your operation.

20 So it just brings in this whole
21 context of biodiversity. And yes, it's a
22 little bit tricky to say it's a judgment call,

1 because in some cases it will be. But at
2 least it puts it on the plate and on the audit
3 trail of the program. So when they are
4 looking at ACAs, and when ACAs present their
5 thing, they say, look, nobody that you are
6 certifying is doing anything to enhance
7 biodiversity. Everything that someone else is
8 doing is doing that. You are going to get
9 dinged on your accreditation. You know it
10 just pushes it downhill. So it puts it in the
11 forefront for everybody. It's going to be
12 almost impossible because of the depth and
13 breadth of the nation. We talked about
14 natural resources. That's a piece of it. But
15 the biodiversity that can live within those
16 natural resources is just phenomenal. It'd be
17 impossible I think to write a standard that
18 was really really homed in and said you must
19 do this, you must do that.

20 MEMBER HEINZE: I do get that
21 piece. The question is are there things that
22 we need to do? Should this recommendation or

1 recommended guidance get approved by the
2 Board? Are there things we need to do after
3 that to help with the judgment piece? To
4 help, you know, I'm looking at some -- I've
5 got definition materials staring me in the
6 forehead. Five years from now are we going to
7 be staring at biodiversity and having
8 certifiers up here saying, well, this
9 certifier gave me a severe violation because
10 I converted natural habitat or whatever it's
11 called, and this certifier did this.

12 And you know, I just worry about
13 the Pandora's Box. So are there things we can
14 do to try to improve the consistency of a
15 naturally hard topic?

16 CHAIR MOYER: I think Joe wanted
17 to address that.

18 MEMBER SMILLIE: Yes, I certainly
19 don't speak for all certifiers, but since I'm
20 in the seat representing certifiers, I will be
21 forced to.

22 I would say that the way it is

1 going to evolve, and I would look to that --
2 as you have carefully noted, Katrina, applying
3 hard and fast rules are going to be very very
4 difficult, and I don't think we want to. I
5 think what Barry is talking, it puts it on the
6 table for discussion. And the ACAs will be
7 discussing it. There will be inconsistencies
8 in the interpretation, and that, I won't say
9 it's a good thing, but it's a natural thing.
10 And certain people will take leadership. And
11 the NOP will be sitting back auditing these
12 things saying, well, these guys approached it
13 this way and these guys this way.

14 So I see it as a slow continuous
15 evolution to best management practices. And
16 as different people step up and create their
17 interpretation, others will be challenged to
18 not have the same interpretation.

19 So I think in five years,
20 absolutely. As Kathleen said among her many
21 other great statements, there is no end in
22 sight.

1 So it will be an evolution of best
2 practices and interpretations. And the NOP
3 won't, I don't think, will be drawing hard and
4 fast auditing rules. They will be watching to
5 see the performance of the ACAs, and
6 leadership will be exercised by different
7 people at different times. And we'll just
8 grow that experience.

9 MEMBER FLAMM: Let me make a
10 comment before I call on Dan. But I'd like to
11 point out that, again, that this is, as far as
12 materials, is just trying to implement a
13 decision that was already made by the Board.
14 So this is not a new decision.

15 Now it doesn't mean we couldn't
16 revisit that decision. But this is not
17 something new. It just hadn't been
18 implemented by any kind of -- it's actually in
19 the policy manual right now, and the decision
20 was made. It was just never -- the step of
21 adding to the checklist so we could think
22 about it.

1 And I don't think -- when we say,
2 is a substance harmful to the environment.
3 Boy, that takes a lot of thinking by the
4 committee. When you are going around and I
5 think adding biodiversity, of course
6 biodiversity is part of the environment, but
7 it just tries to highlight, let's think about
8 this a little more closely than perhaps we
9 have in the past. So that's the way I look at
10 it.

11 Dan, you have a comment.

12 MEMBER GIACOMINI: Yes, I
13 thought, when I first read the document, I
14 thought it was terrific. And then as I was
15 putting together my material presentation,
16 most of the things that you talk about are
17 already in our criteria list of the things --
18 of looking at that.

19 But the -- I think toward a
20 rephrasing the concern that I think I hear
21 coming from Katrina is a concern that I got
22 from reading some of the public comments, is

1 an interest by a lot of the comments to take
2 this from a tool and a piece of the puzzle to
3 it being the primary factor.

4 And it's part of that evolution,
5 and we will just have to see where it goes.
6 I think we are making a great start, but you
7 know, I under -- and I recognize it's an
8 extremely underappreciated and under-
9 emphasized part of it even though it's been
10 there all the time.

11 But it's becoming the primary
12 factor is down the road, it makes me nervous.

13 MEMBER HEINZE: One more
14 question. I'm sorry, I'm still struggling
15 with this one. Are there specific practices
16 that are happening today that are of concern
17 and that we are trying to prevent with this
18 recommendation? Maybe folks on the Board
19 could help me understand that better?

20 MEMBER FLAMM: Well, I can say
21 yes, but I'm not going to go into specifics.
22 But there certainly are. I don't know if

1 there are any other -- would you like to?

2 MEMBER SMILLIE: Sure. One of
3 our adversaries whose name I will not mention
4 continually points out that organic isn't
5 sustainable because it gobbles up jungle or
6 CRP land because it hasn't been treated with
7 a prohibited substance for three years
8 conveniently qualify for organic.

9 So you clear the land -- bingo,
10 you've got an organic crop coming right off
11 it. Whereas if you had farmed land it takes
12 three years. So there is a financial
13 motivation to clear land.

14 That's a simple example. There
15 are more complicated and tricky examples. And
16 you get into crop rotation. There you get
17 into an argument that Barry is very fond of,
18 if we ain't got the water we can't have a
19 rotation argument. So there is no
20 biodiversity on large Western wheat farms
21 because they haven't got enough rainfall for
22 cover crops. And you get that argument.

1 You get into, well, do we really
2 enforce rotations argument. There's a lot of
3 biodiversity that extends into those areas,
4 and those are really gray area calls for a
5 certifier. It's really tough to make those
6 calls. Because technically when you are
7 clearing jungle land to grow soybeans in
8 Brazil -- I shouldn't pick on any one
9 country, it can apply to any country. Is that
10 increasing biodiversity? It'd be pretty hard
11 to answer yes.

12 CHAIR MOYER: Barry, I believe
13 Barbara from the program had a comment she
14 wanted to make.

15 MS. ROBINSON: I just think that
16 when you start to talk about noncompliances or
17 how you are going to use this, I guess the
18 program, you're probably going to be looking
19 at this, first of all, we'd want to see
20 certifying agents build this into OSPs, of
21 course. That's where you really want to --
22 that would be the first place you'd want to

1 see this being used.

2 And we tend to look at these
3 things certainly from the lens of what would
4 hold up in an enforcement action. And you can
5 easily see where certifying agents start
6 getting nervous, because they think, oh sure,
7 we issue a noncompliance because somebody had
8 what we think is an egregious violation. They
9 weren't -- we didn't think it was very
10 biodiverse here.

11 And we can see where down the
12 road, oh boy, that is not going to hold up on
13 appeal. There is nothing specific in the
14 regulation to support this.

15 Well, I guess that's not what we'd
16 really want to see. What we'd want to see is
17 a robust organic systems plan approved from
18 the beginning that reflects biodiversity. And
19 I think that's really where you are trying to
20 go here, and that's what makes more sense.
21 That's where you'd want this to evolve.

22 And I think that would address

1 Katrina's issues, and that would certainly
2 address our issues.

3 And Joe is right, things like --
4 we've gotten this question. We got this
5 question during the farm bill. Can land come
6 right out of the CRP and be eligible for
7 certification. We thought that was kind of --
8 we really had to sit back in our chairs and
9 say, well, gosh, if it was such fragile land
10 to go into the CRP, do we want that land to go
11 into organic production? That seemed kind of
12 an odd question to us to ponder. We are not
13 soil experts, just on the face of it it seemed
14 kind of strange to us. Same with fragile
15 wetlands and that sort of thing. If you've
16 got to put that land into a designated program
17 because of its fragility somehow, we would
18 expect a certifying agent to really give some
19 pause as to why would that land come into
20 organic production? How is it going to be
21 handled, those sorts of things, and be
22 reflected in the OSP. That's where you'd see

1 these measures.

2 And so then that would give a
3 certifying agent or a producer much firmer
4 ground, pardon the pun, on which to stand for
5 taking action down the road then. Because you
6 would have the commitment for the
7 biodiversity. If you see where I'm going.

8 CHAIR MOYER: Barry, and I think
9 to Katrina's question, and I agree 100 percent
10 with what Barbara just said. It allows this
11 document and this checklist kind of process
12 will allow ACAs to initiate the conversation
13 and the discussion with farmers when they are
14 filling out their plan or updating their
15 system plan.

16 I gave a talk on biodiversity this
17 past winter, and I asked farmers in the room,
18 and some were organic and some were not, what
19 they did to enhance biodiversity. And one
20 farmer said, well, I don't shoot deer out of
21 season.

22 If that is the answer the ACA

1 gets, you know biodiversity isn't on the
2 forefront of their mind, and you might want to
3 encourage them to start looking at ways of
4 managing habitat to increase biodiversity.

5 So I think that is what we are
6 trying to do. And I think you start with
7 those big problems and those egregious errors
8 in judgment and work your way toward something
9 much more concrete.

10 But I think this just gives -- is
11 a tool to give people the opportunity to do
12 that.

13 And I would also suggest that in
14 contrary or deference to the comment we heard
15 yesterday about using natural resources as
16 opposed to biodiversity because farmers are
17 more used to that word, I think farmers will
18 become used to the word, biodiversity, when we
19 use it. And I think they are two totally
20 different things. Natural resources is more
21 like the structure that houses the
22 biodiversity, and biodiversity can live or

1 flourish within that structure. But water
2 doesn't necessarily disappear if you take out
3 the biodiversity. So I think they are two
4 separate words that are connected and joined,
5 but we should keep them.

6 MS. ROBINSON: Thank you for that
7 comment. Tina has a comment.

8 MEMBER ELLOR: Another area where
9 this has come to the forefront is -- has to do
10 with food safety and food safety issues that
11 lots of biodiversity applications are being
12 wiped out by the concern that you can't have
13 any wildlife on your farm because it's going
14 to poop on something. So that is another area
15 where this has come up quite a bit recently.

16 MEMBER JAMES: Barry, I was just
17 curious why biodiversity wasn't included in
18 the terms defined.

19 MEMBER FLAMM: I'm sorry, would
20 you repeat that?

21 MEMBER JAMES: I don't know what
22 that is. There's a mouse in the house.

1 You have recommended terms
2 defined, and I was curious why biodiversity
3 itself was not included in the terms defined
4 that you are proposing.

5 MEMBER FLAMM: The terms defined
6 are those right out of the regulation to show
7 what's in the regulation. And biodiversity
8 along with other terms were not specifically
9 defined in the regulations. So it's covered
10 under the organic system plan, and it's
11 discussed in the preamble and elsewhere.
12 Pieces of biodiversity is included in other
13 definitions. But there is no specific
14 definition for biodiversity that's in the reg.
15 And that listing just showed -- was an example
16 of that, and that's the reason it's not in
17 there.

18 And since there was a decision
19 early on to not go in -- decision not to go
20 for regulatory change we felt that that wasn't
21 really necessary. So it isn't in there. It
22 isn't in the recommendation for that reason.

1 This was just a background, what you are
2 reading is in the background of what was in
3 the regulation. I'm sorry if that wasn't
4 clear.

5 MEMBER JAMES: Right. I guess my
6 question still stands, as to whether or not
7 you would consider adding that to terms
8 defined. If we are asking inspectors to look
9 at biodiversity to be clear, or maybe it's too
10 broad of a topic to be able to put into terms
11 defined, I don't know.

12 MEMBER FLAMM: Well, like I say,
13 since we are not going for regulatory change,
14 and that would be a regulatory change to add
15 that to the regulation -- that's the reason
16 it's not in the recommendation. I guess I'm
17 not explaining it correctly.

18 CHAIR MOYER: I think maybe I can
19 clarify it. What Barry did was, he took the
20 definitions out of the front of this book, and
21 there is none for biodiversity. And in order
22 to create one you have to go through

1 regulatory change, and that is a long
2 cumbersome process, and we chose as a group to
3 not do that, and not write a hard and fast
4 rule on what biodiversity was, but define it
5 in terms of those check sheets, and let each
6 farmer define it themselves.

7 MEMBER FLAMM: But the discussion
8 document gives kind of a definition right up
9 front of what we're talking about in terms of
10 biodiversity, but that is not part of the
11 regulation, and it's not part of the
12 recommendation to do that.

13 CHAIR MOYER: If the board, okay,
14 I was just going to mention that we are
15 running further and further behind time.
16 There is a comment from Wild Farm Alliance,
17 does the Board want to entertain that comment,
18 Barry? You have the floor.

19 MEMBER FLAMM: Yes, I would like
20 to entertain the Wild Farm Alliance's comment.

21 CHAIR MOYER: Please be very
22 brief with your comment.

1 MS. BAUMGARTNER: Joann

2 Baumgartner, Wild Farm Alliance.

3 Natural resources is defined in
4 the rule. So it says you must maintain or
5 improve the natural resources including soil,
6 water, wetlands, woodland and wildlife. And
7 as Jeff said, biodiversity falls within that.
8 So there is really distinct guidance on that.

9 CHAIR MOYER: Thank you, Joann.

10 Okay, is there any other
11 conversation or discussion on this item for
12 Barry? Kevin.

13 MEMBER ENGELBERT: Just very
14 briefly for Katrina's sake, I don't ever see
15 this becoming a huge problem, simply because
16 farming organically promotes biodiversity, the
17 lack of chemicals, pesticides, herbicides.
18 Every organic farmer you can speak to will
19 tell you they've seen an increase in
20 biodiversity simply by becoming organic.

21 MEMBER FLAMM: Part of what I'm
22 struggling with is exactly that statement,

1 that just the nature of being organic
2 increases biodiversity. So why then this
3 recommendation, which led to my question of,
4 are there more specific things we are trying
5 to prevent. And then should a recommendation
6 more specifically target those.

7 I do appreciate the robust
8 discussion on this topic. Maybe I'm the only
9 one struggling, in which case maybe we don't
10 need quite so much robust discussion.

11 CHAIR MOYER: Well, I think the
12 discussion is warranted. But I disagree with
13 Kevin's comment, that I've been on many
14 organic farms that do not encourage or enhance
15 biodiversity. They are simply large
16 monoculture farms that use a one-to-one
17 substitution.

18 You may argue that they are not
19 truly organic farms, but they just use a one-
20 to-one substitution of an approved product for
21 a non-approved product, and they go ahead and
22 they monoculture raspberries or whatever they

1 might be doing, I don't want to pick on any
2 one particular crop, and it isn't like your
3 farm or mine. So I don't think you can
4 necessarily make that -- and what is what we
5 are trying to correct with this guidance
6 document to say, what are those individual
7 operations doing to begin to encourage and
8 increase biodiversity on farms.

9 MEMBER ENGELBERT: I'd defer to
10 your experience in traveling and seeing
11 different farms. I was basically speaking
12 from our own -- my own little corner of the
13 world, northeast, and what I've seen on local
14 farms in my area, and just the geographic, the
15 way things lay with the hills, the mountains,
16 the streams, the woodland, it's always going
17 to be part of our terrain. And watching
18 flocks of migrating birds fly over
19 conventional fields and congregate on mine
20 year after year after year because they have
21 learned there's higher quality feed on those
22 fields to glean and safer feed than there is

1 on the neighboring operations.

2 MEMBER FLAMM: If I could close
3 with one -- repeating a statement made earlier
4 by our new deputy secretary, let's don't make
5 the perfect the enemy of the good.

6 CHAIR MOYER: Thank you, Barry,
7 for a good presentation.

8 Now we are going to move on to the
9 crops committee, Tina Ellor, chairperson.

10 Tina, the floor is yours.

11 CROPS COMMITTEE

12 MEMBER ELLOR: Thank you.

13 First, I'd like to thank the Crops
14 Committee officially for all the work we put
15 into the few substances that we have up here.
16 I'm new as chairman, and Gerry has been
17 mentoring me through, and a lot of these
18 things came on board before I was chair, and
19 coincidentally Gerry did most of the lead work
20 on isoparaffinic hydrocarbon, sulfurous acid,
21 paracetic acid, and also the soil systems.
22 Kevin took point on ferric phosphate, and Rigo

1 took point on hydrogen chloride. The list for
2 inerts we've all been working on.

3 So I'd like to say right up front
4 that we've had some challenges with the
5 technical reviews. But on the committee we
6 have a great deal of expertise, and we are
7 trying to work through those deficiencies,
8 what we consider deficiencies in the technical
9 reviews. And we have gone -- certainly we
10 always go outside the TAP for information,
11 technical review, for information and the TAP
12 for information when we had them.

13 So we have done our best to remedy
14 those deficiencies, and we are working with
15 Dan Opie and Science and Tech in getting more
16 of what we need. But it's been a tremendous
17 challenge working on materials with these
18 technical reviews.

19 That being said I think they did a
20 very thorough job, which I'm sure will come
21 out in the discussion.

22 So I'm going to hand it over to

1 Gerry to go through the recommendations and
2 highlight some of the points of discussion we
3 had. And we'll kind of tag team back and
4 forth talking about the public comments we've
5 gotten on these things and some of the
6 discussion that has gone on since then.

7 Take it away, Gerry.

8 MEMBER DAVIS: Thank you, Tina.

9 The first material is tissue
10 material, isoparaffinic hydrocarbon. The
11 petition is for inclusion of isoparaffinic
12 hydrocarbon under synthetic substances allowed
13 for use in organic crop production. It's an
14 inert extractant used for the extraction of
15 pyrethrins for insect control.

16 And we looked at it as a committee
17 and voted unanimously that of the three
18 evaluation criteria that it failed all three.
19 And we wanted to highlight a few of the points
20 about the material and for those that didn't
21 read everything.

22 Isoparaffinic hydrocarbon, also

1 known in the industry as an Exxon Mobil
2 product called isopar M, it's very common
3 solvent. It's a petroleum distillate. It's
4 a carbon chain in the range of 12 to 16
5 carbons, mostly C14 I think.

6 And it is used to extract the
7 pyrethrin from the African daisy raw material.
8 Concentration of the pyrethrin extract as
9 produced in Africa I believe is standardized
10 at 20 percent pyrethrin and 80 percent isopar
11 M. And that's the way the petitioner and
12 manufacturer of the finished product receives
13 it I believe in this country. And then they
14 reformulate it into a pesticide product which
15 contains .5 percent pyrethrin, along with
16 diatomaceous earth.

17 The maximum use rate of the
18 material is six pounds per acre, and as a
19 licensed pest control advisory in the state of
20 California, I'm very familiar with the
21 material itself, the formulated material. And
22 six pounds per acre is the typical use rate to

1 get it to function as a -- for insect control.

2 At this rate a producer would be
3 applying, when you figure out the fraction of
4 .5 percent pyrethrin versus the solvent
5 carrier that it was extracted with, at that
6 six pound application rate of the formulated
7 product, you would be applying, a grower would
8 be applying, 1.92 ounces of isopar M to the
9 certified organic crop.

10 Multiple applications are common
11 with these pyrethrin materials as they are
12 most typically used for difficult to control
13 insects such as many beetle species.

14 The crops committee, we discussed
15 this at length, and we did not consider this
16 fact of almost two pounds of petroleum
17 distillate per acre per application to be an
18 acceptable practice in the organic marketing
19 program.

20 We discussed that consumer
21 confidence and support for the organic system
22 and marketing order is very important, and I

1 don't think if it was common knowledge -- we
2 didn't think, that is -- that if it was common
3 knowledge that two ounces per acre petroleum
4 distillate solvent applications to come,
5 organic crops, edible crops, was a good idea.

6 So that is the foundation of, I
7 think, why we rejected it. Why we recommend
8 rejecting it.

9 Some of the other points is that
10 there are other pyrethrin formulations on the
11 market that are extracted with different
12 materials. That information of precisely what
13 materials they use for their extraction was
14 not available to us because it's proprietary
15 information and no one would tell us.

16 Alternative possible extraction
17 methods also exist using supercritical methods
18 using high pressure carbon dioxide, liquid
19 carbon dioxide, to extract the material.

20 But we were unable to determine if
21 those were actually used in the industry or
22 are they just a possible way of formulating

1 pyrethrins or extracting pyrethrins.

2 With that I'd like to open it up
3 to any questions? Yes.

4 MEMBER ELLOR: I just wanted to
5 comment that we do try to read all the public
6 comments, and we had one comment saying that -
7 - it was from the manufacturer, with a lot of
8 reasons why they thought we should delay the
9 decision on this or reasons that it should be
10 listed. We didn't have any comments
11 supporting listing it besides that, but we had
12 many comments supporting our decision not to
13 list it.

14 And there was some great work done
15 on this petition by the whole committee.

16 MEMBER DAVIS: Seeing no other
17 questions I'll move on to the next material,
18 which would be sulfurous acid.

19 Bear with me just a moment.

20 (Pause)

21 The petition is to include
22 sulfurous acid in the national list at 205601

1 J, which is the listing for elemental sulfur
2 at this point I believe.

3 The committee voted unanimously
4 that the material satisfied all the evaluation
5 criteria, criteria one, two, and three, as
6 long as it could be annotated as follows, that
7 the proposed annotation would be on farm
8 generation of the substance using 99 percent
9 purity elemental sulfur per Section
10 205601(j)(2) only.

11 The on-farm generation of the
12 substance acknowledges that the material is,
13 under current technology at least, is very
14 transient, and has a -- when produced the acid
15 itself has a half-life measured in hours, so
16 it can't be produced off site and shipped to
17 the farm.

18 The 99 percent purity portion of
19 that annotation was because that purity of
20 sulfur is readily available in the marketplace
21 from multiple supplies, and it was intended to
22 optimize the on-farm production of the acid

1 with the smallest possible environmental
2 impact from the burning of sulfur which
3 produces sulfur dioxide which is injected into
4 the irrigation stream which produces sulfurous
5 acid.

6 Sulfur dioxide is the compound
7 present in the natural environment that gets
8 into water and the atmosphere producing
9 sulfurous acid and the net effect of pH 5.2 to
10 5.5 rainwater as the petitioner presented
11 yesterday.

12 Unfortunately you were not able to
13 get through your entire presentation, so I'm
14 going to try to fill in a few holes for the
15 benefit of the audience and the rest of the
16 Board.

17 We wanted to respond to some of
18 the public comments, the written comments
19 submitted. First one was a common point that
20 was made by a couple of commenters was that
21 there was no TAP or technical report used for
22 this recommendation. And that is not entirely

1 correct. The crops committee was anticipating
2 the arrival of the technical report leading up
3 to our deliberations. At the time at the very
4 latest date that we could get this
5 recommendation done prior to posting it had
6 still not arrived.

7 We had agreed as a committee to --
8 we were anticipating the technical report to
9 arrive before this meeting, which it did. So
10 we committed to present any new information
11 that was in the technical report as part of
12 our presentation today to account for not
13 having the technical report on hand when we
14 voted.

15 We did not -- when it did arrive
16 and we analyzed it we did not see new
17 information that we did not go over; so there
18 was nothing to present from that technical
19 report that we did not present in the
20 recommendation, in the evaluation criteria
21 forms.

22 We made the decision to go ahead

1 and vote on it before the technical report
2 arrived because we had lots of information on
3 this fairly simple and straightforward
4 material. We had available to us a reasonably
5 thorough and complete petition, a very large
6 and informative U.S. Geological Survey
7 document on sulfur, the base material; and
8 lots of sources for the historical use of the
9 material from when it was an approved input on
10 certification systems such as what CCOF had in
11 California prior to the national rule.

12 Another comment that was received
13 was concerning the source of the elemental
14 sulfur, and if you could refer to category
15 two, question two, Valerie, would answer some
16 of that comment.

17 The comment was, when the
18 elemental sulfur on the market comes from
19 petroleum or natural gas, so why do we want to
20 approve this usage.

21 The substance can be produced from
22 burning naturally occurring mine sulfur, which

1 is the subject of question two in the
2 evaluation criteria. Is the substance
3 formulated or manufactured by a process that
4 chemically changes a substance from a mineral,
5 naturally occurring mineral source.

6 Unfortunately, and that was one of
7 the main things we got from the U.S.
8 Geological Survey document was that due to air
9 pollution abatement laws in the 1970s that
10 required oil and natural gas producers to
11 scrub the elemental sulfur out of the oil and
12 gas it put all of the natural elemental sulfur
13 mines out of business because it was far
14 cheaper material than what they could produce
15 by mining, and that was well documented in
16 that report.

17 So and I think the petition also
18 pointed out that when natural gas and oil
19 disappear, and are no longer in commonplace
20 usage, that the elemental sulfur mines are
21 still there to be reopened and used once
22 again. And in fact I contacted one sulfur

1 producer in the Gulf states, and I asked him
2 that question about when they shut down their
3 mines and so forth, and the answer I got was
4 that with the high price of oil and gas last
5 year, the price of elemental sulfur to the
6 farm went very high as well. And they
7 actually looked at reopening their mines
8 briefly because the price of sulfur was high
9 enough that they could justify it.

10 But now things have changed, and
11 the price has gone down to a more normal
12 level, and that's not going to happen anytime
13 soon, so the oil and gas are gone at least.

14 So all elemental sulfur for use as
15 a soil applied elemental sulfur, it comes from
16 petroleum and natural gas, and that's all we
17 have to work with.

18 So that leads into the last public
19 comment of, well, we have alternate methods
20 here. Why don't we just apply elemental
21 sulfur to the soil? And I wanted to refer to
22 category two, question nine, for that. Is

1 there an alternative substance? Yes, there
2 are. Soil application of elemental sulfur is
3 possible, and it is used routinely in the
4 Western United States by organic growers to
5 lower the pH of their soil and deal with their
6 high pH irrigation waters. The problem with
7 that is, it's not as desirable as using the
8 sulfurous acid, as with the sulfurous acid you
9 can control, put on a very little bit at a
10 time to basically match your irrigation water
11 with natural rainwater without putting large
12 amounts of elemental sulfur on the soil, which
13 does have impacts on microbial soil life at
14 the rates that you have to spread it and
15 broadcast it on the field to accomplish the
16 desired effect.

17 So this material would actually
18 soften the blow to the microbiological life in
19 the soil, being that it can be controlled and
20 be applied incrementally at levels that are
21 not as hazardous to that microbial life.

22 The other natural materials or

1 alternative substances would be citric acid,
2 which is commonly used now. I think one of
3 the commenters yesterday mentioned using it in
4 blueberries. And it is a very weak acid and
5 requires huge quantities of it. And we
6 analyzed that at the committee level, and I
7 submitted information from the farm that I
8 work for with our high pH irrigation waters
9 that, to amend our well water to rainwater
10 levels, would require -- at the amount of
11 water we apply for a blueberry crop -- would
12 use about 6,700 pounds of citric acid per acre
13 per year. So it is a huge quantity of a very
14 weak acid you have to apply to accomplish the
15 same thing, versus a very small amount of this
16 elemental-sulfur derived sulfurous acid.

17 So hopefully that gives you -- the
18 commenters -- a broad picture, and the
19 commenters and the Board a broad picture of
20 how thoroughly we went over this and hashed it
21 all about, and didn't just very quickly decide
22 to vote to recommend approval of this

1 material.

2 Next would be questions on that.

3 Steve.

4 MEMBER DeMURI: Gerry, the use of
5 citric, are there other problems with that
6 besides -- assuming the cost is much higher
7 because you would have to use so much. But
8 are there application issues? Are there other
9 issues that would keep you from using citric
10 over this new substance?

11 MEMBER DAVIS: Citric acid is
12 always being questioned on whether it is truly
13 natural or not, in the way it is produced.
14 That is one question we analyzed and tried to
15 get some information on that. We didn't get
16 the full answer from the technical report that
17 we asked for on that, on the way that citric
18 acid is made, and the sources of it, where
19 it's coming from. We were told that in
20 general it comes mostly from China because
21 their manufacturing costs are cheaper and they
22 ship it here. So oversight of the production

1 of it is maybe a little limited. We are
2 concerned about that.

3 That huge quantity -- 6,000 pounds
4 or more of citric acid -- is well beyond the
5 profit potential of a blueberry crop. You
6 could spend that money and not make any money
7 on the crop, if you were trying to do that.

8 Seeing no other questions, I guess
9 we'll move on to peracetic acid. The petition
10 was requesting to remove the annotations from
11 the listings for peracetic acid, which
12 currently on the list, 205601(a)(6),
13 205601(I)(7).

14 And based on that request to
15 remove the annotations -- which would
16 essentially place no restriction on peracetic
17 acid use in organic farming -- the committee
18 voted unanimously that, based on that criteria
19 that it does not fit, did not satisfy any of
20 the evaluation criteria of impact on humans,
21 environment, is it essential, or is it
22 compatible and consistent with organic and

1 sustainable farming?

2 We acknowledge that we did not
3 want to see the Board reject the material
4 entirely, the petition, because peracetic acid
5 is a component of hydrogen peroxide
6 formulations that are currently widely used in
7 organic production and very important to a lot
8 of people, a lot of farmers. So we did not
9 want to throw that material, that related
10 material and usage, into jeopardy by throwing
11 out the material completely. The main reason
12 that we did not want to remove the annotation
13 to allow expanded use of the material was that
14 -- I mentioned this yesterday -- we were
15 concerned that although the labels on the
16 market today for hydrogen peroxide peracetic
17 acid formulations, they are what they are
18 right now. But if we just gave a blanket
19 approval of the material, it would allow any
20 formulators or producers of the material to --
21 depending on EPA registrations and so forth --
22 come up with very strong peracetic acid

1 formulations that could conceivably be used as
2 soil biocides -- watered into the soil --
3 which would have dramatic effects on organic
4 sustainability and the whole concept of
5 ecological farming and the biodiversity of
6 microbial and other life in the soil.

7 So we just didn't want to open the
8 barn door and say, yes, do what you are going
9 to do someday. Right now it may not have been
10 a problem, but we could very easily see that
11 it would one day lead to very expanded and
12 high usage of peracetic acid in a soil
13 drenched type of application. I hope I'm
14 explaining this correctly.

15 So we proposed a separate
16 recommendation, and that's up there. I don't
17 think I can read it from here. So based on a
18 different annotation, an annotation change
19 from the current, we voted as a committee,
20 also unanimously, that it changed whether the
21 valuation criteria were satisfied. We felt
22 that it changed the impact on humans and

1 environment, and it also changed the essential
2 unavailability criteria.

3 So I think the comments contained
4 there in Section B I already pretty much
5 explained in my discourse a minute or two ago.
6 We did not want to jeopardize the currently
7 available hydrogen peroxide formulations that
8 rely on that small amount of peracetic acid
9 being there to be effective. So we
10 recommended that we limit it to no more than
11 two percent concentration, which was based on
12 the most common and invasive hydrogen peroxide
13 formulation that is on the market right now,
14 so as not to jeopardize that type of product
15 that is currently used a lot.

16 Any questions? Jeff.

17 CHAIR MOYER: More a comment than
18 a question. What essentially we were trying
19 to do as a committee was keep the status quo,
20 which by default we had to make this change
21 because they changed the way this material
22 needs to be listed -- it no longer can be

1 listed as an inert; it's an active ingredient.
2 So we have to make some change, we can't just
3 not do something.

4 MEMBER DAVIS: Yes, I neglected to
5 say that the EPA has changed its regulation,
6 which has forced the hydrogen peroxide
7 formulators to declare peracetic acid as an
8 active ingredient rather than an inert. So
9 that is the big change, and that is what
10 prompted the petition. And we wanted to
11 respect that and try to keep those products
12 that many growers we are told rely on on the
13 marketplace so they could still use them.

14 We posted these as discussion
15 items rather than for vote, because we are
16 really seeking more public comment and
17 information on the use of these materials, and
18 also on -- there is a stabilizer that has to
19 be in these formulations, that was mentioned
20 yesterday in the public comment. It's called
21 HEDP. It's a phosphate-containing stabilizer
22 that regulates the balance between hydrogen

1 peroxide and peracetic acid in these
2 formulations, because it is a two way reaction
3 when you mix hydrogen peroxide with acetic
4 acid which forms the peracetic acid.

5 We were not able to find what we
6 felt was good information on the HEDP as far
7 as its environmental impact and what it's all
8 about. So we didn't feel comfortable voting
9 on it this time around. We wanted to get more
10 information on the HEDP, as well as input from
11 the organic community on the use of these
12 materials, and importance of them to organic
13 growers.

14 Any other questions?

15 I turn it back.

16 MEMBER ELLOR: Thanks Gerry for
17 your yeoman services. We do spend, and
18 everyone on the Board, I don't even need to
19 say this, a tremendous amount of time
20 reviewing these materials, and it's been a
21 real challenge.

22 The next thing on our list, and

1 Kevin and I were just talking about this a
2 little bit, was the sunset 2011. And I won't
3 say too much about that, except to say that
4 we've been following the public comments on
5 ferric phosphate and hydrogen chloride, and
6 like I said Kevin is taking point on ferric
7 phosphate. We've had some discussion in
8 committee on that. And Rigo is taking point
9 on hydrogen chloride, and we have also been
10 discussion that a little bit. We haven't done
11 any formal documents on them yet, but so far
12 all the public comments that we have received
13 have been in favor of keeping those on the
14 list. So I don't think I need to say anything
15 more about that. Does anybody want to add
16 anything to that or have any questions about
17 it?

18 And then, also a discussion
19 document, I have to turn it back to Gerry,
20 because he has been the main author on the
21 soil list systems document. And that is just
22 a discussion document, so we probably don't

1 have to spend too much time on it. We have
2 gotten some comments, but that is just a
3 discussion document.

4 So in terms of time spent maybe we
5 can just have a brief talk on that, and list
6 four, inerts, and pesticides, once again
7 that's something we received a lot of public
8 comment, and we are going to be taking that
9 back into committee and working very hard on
10 coming up with more on that.

11 So back to you, Gerry.

12 MEMBER DAVIS: On the soilless
13 growing system, this was an old crops
14 committee agenda item that had been passed on
15 and passed on, and shoved to the back burner
16 for a number of years, and we have been
17 attempting to work this through and get things
18 voted on and presented.

19 One central theme that has come up
20 that we wanted to address at this meeting by
21 putting it in a discussion item so it would
22 hopefully prompt public comment, was the idea

1 that for typically greenhouse growing systems,
2 that hydroponics and aeroponics, variations of
3 those production methods, should not be
4 considered compliant with organic farming
5 regulations, because of the lack of soil.

6 These methods of growing crops is either roots
7 in an inert base substrate, that is not a
8 soil; it could be rock wool or something.

9 Just a place for the plants to attach their
10 roots. Or suspending them in water itself,
11 and let the roots dangle in water. Aeroponics
12 would be roots suspended in air, just mist it
13 with water under plastic covers. So those
14 right now there is a gray area in our rules.

15 It's not specifically mentioned if that is
16 okay or not. So there is beginning to be some
17 emergence of those types of production
18 methods, attempting at least to be certified
19 as organic.

20 We were unable to determine if
21 there really are any actual operations
22 certified in this country, but it is coming

1 closer certainly. And so it's time to deal
2 with that issue.

3 And so we presented this document.
4 It talks about why that -- those methods would
5 not be considered organic, but it also
6 presents the idea for containerized growing of
7 terrestrial crops in, most typically,
8 greenhouses where there is a compostable
9 substrate base of natural materials where all
10 the normal microbial life and soil in
11 vertebrates and beneficial nematodes and on
12 and on and on, fungi, if it's a type of media
13 where all those can grow and subsist like
14 regular organic farm soils in the field, then
15 it should have the potential at least to be
16 considered as a soil because of the nature of
17 the ecology that grows there, not because it's
18 dirt, but that's what's the same as out of
19 doors farm soil out in the field, and
20 containerized greenhouse media, if they both
21 generate the same soil ecology, we wanted to
22 present the idea for comment of considering

1 those situations soil. How would you certify
2 that? How would you -- what would the organic
3 system plan and all that for that type of
4 thing, it would need to be developed and
5 presented hopefully this fall as part of an
6 update on the NOSB greenhouse standards, which
7 initially were voted on and approved by the
8 Board in 2001. They were never adopted or put
9 into regulation. And there is some interest
10 now in reviving them and getting some U.S.
11 greenhouse standards.

12 We are lagging a bit behind. The
13 Canadians have their own, and they were
14 questioning the program on why we don't have
15 our standards. And I guess, Barb, if you want
16 to make a comment on that.

17 MS. ROBINSON: When we met with
18 Canada in March as a matter of fact they did
19 ask us whether we had hydroponic standards,
20 whether we recognized hydroponics. I did speak
21 with Gerry. I got the crops committee work at
22 that time.

1 I told Canada that although we do
2 not specifically prohibit hydroponic
3 production, that it was my understanding that
4 we don't approve hydroponic what I referred to
5 as crops in a bucket in this country.

6 But I also committed to Canada
7 because they did ask us, they said, can you --
8 they said, what are you doing? I said, well,
9 actually, we are looking at yours, which made
10 them very happy.

11 And they asked how soon we could
12 come up with something as guidance, which is
13 all I really could commit to at the time.
14 They asked if we could come up with something
15 within a year. So I said yes.

16 My goal is equivalence, so, I said
17 -- well, plus we are going to use theirs.
18 They've already written something.

19 So why not? Anything to get them
20 over the line, right? So that is why I was
21 talking with the crops committee, and was
22 interested in this. But I don't see why not.

1 MEMBER DAVIS: Thank you, Barbara.

2 So I believe that is all we really
3 wanted to say about this. I would make one
4 response to a public comment, I believe it
5 came from CCOF, about everyone -- the few
6 comments that we did receive on this
7 mentioned, well, we haven't seen these
8 greenhouse standards, so how can we really
9 comment on this.

10 So granted, we'll see how the
11 greenhouse standards recommendation comes
12 along for this fall meeting.

13 One question that was mentioned
14 about well, what about transplants, vegetable
15 transplants for example grown for
16 transplanting out in organic production
17 fields. And we as a committee didn't discuss
18 this, but I can think of a response myself, in
19 that working for a farm that uses a lot of
20 vegetable transplants, and it's also in the
21 greenhouse business as well starting this
22 year.

1 I believe that the soil ecology
2 that is talked about and kind of thrown out
3 here in this discussion item for consideration
4 by the committee and hopefully response and
5 input, the soil ecology that it talks about I
6 believe certifiably we should push our
7 vegetable transplant producers to work towards
8 viable organic soil ecology type principles in
9 their transplant media; not just vermiculite
10 and plants popped in there.

11 Because the soil ecology as it
12 interacts with the plant and colonizes the
13 plant roots, that all begins right from
14 germination. In fact that is probably the
15 most important time for those plant-symbiotic
16 relationships to form, not -- they collect
17 that for no reason just because it is not
18 really that convenient to construct a properly
19 well balanced compost base at least, or at
20 least -- I'm getting off track here.

21 So in answer to that public
22 comment, yes, I think it should be more than

1 just vermiculite. It should be a soil-like
2 media that contains viable soil ecology of
3 microorganisms.

4 And any questions on this? Tracy?

5 MEMBER MIEDEMA: Gerry, what about
6 sprouts, edible sprouts? I know we already
7 made special provisions in requiring organic
8 seed for edible sprouts. They have gotten
9 special treatment before. But should your
10 recommendation make organic edible sprout
11 growers nervous?

12 MEMBER DAVIS: No. Again, that's
13 not -- we pointed out in an earlier
14 incarnation of this work at previous meetings
15 that organic sprouts are not -- that is a
16 different topic that is not part of this work
17 and this discussion.

18 It's -- already has its set of
19 rules, and hopefully satisfies the needs of
20 that area of production, and we don't need to
21 readdress anything more other than what I
22 think has already been addressed.

1 Joe, do you have a comment on
2 that? Or something different?

3 MEMBER SMILLIE: No, your answer
4 satisfies me on that one. You may just want
5 to put it back in so there is no confusion,
6 but that is up to you.

7 MEMBER DAVIS: Just to say what --
8 to delineate that idea?

9 MEMBER SMILLIE: Yes, it's food
10 production, not crops, it's handling or
11 whatever.

12 I just want a clarification. This
13 will become a recommendation, this document.
14 And you will also come out with a revised
15 greenhouse growing document. There are going
16 to be two recommendations coming out?

17 MEMBER DAVIS: No, I would
18 anticipate it would be one.

19 MEMBER SMILLIE: So you are going
20 to take what was done before and blend it into
21 this?

22 MEMBER DAVIS: Exactly. We have

1 looked at what was done before, and we will do
2 more work on that, make it more complete
3 including work on what constitutes a proper
4 soil media in a greenhouse, get specific about
5 what can be used, what principles should be
6 adhered to. So to give certifiers something
7 to certify.

8 CHAIR MOYER: Joe, this was a
9 missing piece in that greenhouse document that
10 are going back and trying to fill in.

11 MEMBER DAVIS: And again, it's
12 designed to elicit public comment and input to
13 get more information on doing it the right way
14 when we come out this fall.

15 MEMBER SMILLIE: Yes, and parts
16 of the NLP will have to recuse themselves as
17 the people's garden is planning to have their
18 containerized pots certified, as I understand
19 it.

20 MEMBER DAVIS: Dan.

21 MEMBER GIACOMINI: Gerry, you
22 structured this document around the concept of

1 organic principles. We generally have the
2 discussion around agriculture. Was there a
3 lot of public comment that addressed those two
4 points? Or did the committee do any
5 consideration on the difference in those two
6 points? Or did they see any?

7 MEMBER DAVIS: I'm not sure I
8 understand your question.

9 MEMBER GIACOMINI: Well, I think
10 it's pretty hard to justify, at least it would
11 be for me, to most consumers, that one tomato
12 is that different from another tomato. And I
13 think it would be hard to say that one -- I
14 think most people would say that both tomatoes
15 are agriculture.

16 You used the concept of organic
17 principles to carve out a section and say, we
18 don't think that fits with organic. I'm just
19 -- pertaining to hydroponics, specifically,
20 I'm just wondering if there was any discussion
21 about that?

22 MEMBER DAVIS: Yes, a lot. I

1 think, Jeff, you probably would be a good
2 commenter on that.

3 CHAIR MOYER: Well, I don't want
4 to take up too much time, but your answer is
5 accurate. Yes, there was a lot of discussion
6 about that in the context of the fact we're
7 looking at terrestrial plants that need to be
8 grown in a terrestrial situation. It does fit
9 in with the organic principles, and they are
10 both tomatoes, but there are gross differences
11 in the way the tomato acts and responds to its
12 environment.

13 So we did spend a lot of time
14 discussing that. Kevin, you had your hand up.

15 MEMBER ENGELBERT: Yes, I was
16 going to bring that up before your point, Dan.
17 We hope the comments that we receive have
18 reasoning behind them, because this is
19 extremely difficult subject. And we are going
20 to begin looking at cosmetics and pet food and
21 all these other things. And the argument that
22 we receive is, if we are not using any

1 prohibited substances, or doing any prohibited
2 practices, why can't we call hydroponics
3 organic.

4 So we are hoping the comments that
5 we receive are going to help guide us so that
6 we can come to a sound -- like Gerry said,
7 sound conclusion. And keep these -- this
8 label the way it should be.

9 MEMBER DAVIS: I'm going to be
10 very interested to see how that discussion
11 goes, because I can see where this format of
12 really focusing on the organic principles
13 rather than just whether something should be
14 considered agricultural or not, could have a
15 huge impact on discussion of other items that
16 we are looking at down the road.

17 CHAIR MOYER: Tina, back to you.

18 MEMBER ELLOR: Okay. Well, I
19 think in the interests of maybe trying to get
20 back on schedule, if there is no more
21 discussion we could move on to the livestock
22 committee.

1 MS. FRANCES: One small point. I
2 just noticed in this soilless discussion
3 document you refer to aquatic plants
4 recommendation, or aquatic plant production
5 standards. And you already made a
6 recommendation on aquatic plants. I didn't
7 really see that phrase.

8 MEMBER ELLOR: I don't believe we
9 did yet. That would have been --

10 MS. FRANCES: In March, 2007, I
11 think.

12 MEMBER ELLOR: Right, okay.

13 MS. FRANCES: So just for the
14 record, that's all.

15 CHAIR MOYER: Tiny, did you want
16 to discuss anything about list for inerts yet?

17 MEMBER ELLOR: No, only to say
18 that it's constantly in our committee. We are
19 constantly looking for public comment. We got
20 a lot of great information from Henri and from
21 OMRI and from CCOF, and we'll be continuing to
22 work on that unless somebody else has some

1 discussion about that.

2 CHAIR MOYER: Okay, what we are
3 going to do now is, we are going to break for
4 lunch. Before you go, Barbara has a comment,
5 and then I'll be back.

6 MS. ROBINSON: I just wanted to
7 let everybody know, if you have signed up to
8 go see Deputy Secretary Merrigan this
9 afternoon, remember her office is in the
10 Witten Building. Her office is 202B, but you
11 need to enter on the Jefferson Street side.
12 That is the side that faces the mall. The
13 national mall. You have to check in at the
14 guard station. You will have to enter where
15 it says visitors. Mark is going to be down
16 there, Mark Bradley is going to be down there,
17 so he'll help everybody who wants to come in.

18 We have given everybody's name to
19 Marilyn Pisch, who is Kathleen's secretary,
20 and so you will have to get cleared in. You
21 know if you have come down to see us before
22 they go to put you through the security and

1 all that jazz. So anyway, that's again, 202B
2 is her building -- I mean her office -- her
3 building. She does have the building, though.
4 Anyway so that is just up on the second floor,
5 right up next to what we used to call the
6 cage. So just check in at the guard station.
7 Your name will be there. If your name is not
8 there, you're not there. So okay.

9 CHAIR MOYER: Thank you, Barbara.

10 This meeting is temporarily
11 adjourned -- I'm sorry, Valerie has one more
12 comment.

13 MS. FRANCES: On the list for
14 inert question, Chris Fiefer from EPA is here
15 if you wanted to ask any questions of him.

16 CHAIR MOYER: Were there any
17 questions from the Board for Chris Fiefer on
18 lists for inerts? Yes, we do have one
19 question. Kevin.

20 MEMBER ENGELBERT: Could he come
21 to the microphone and just give a brief
22 description of why they did away with a

1 listing of the inerts, those four inerts.

2 CHAIR MOYER: So you want to know
3 why your life suddenly got miserable?

4 MR. FIEFER: Hi, I'm Chris Fiefer.
5 I am not actually authorized to speak with
6 regard to agency policy. I want to get that
7 out of the way right now. It seems like I'm
8 brought up here whenever that is the case.

9 Let me go back. I think I covered
10 this briefly last time I was here; I spoke a
11 little bit about the back story of the list.

12 The list was never a statutory
13 list for the EPA; it was kind of a cocktail
14 napkin list developed for our own tolerance
15 reassessments. It was not created with the
16 NOP in mind, nor was it really created with
17 our food tolerances in mind.

18 That said the list was practical
19 with regard to this program, because the human
20 toxicity of most of the inerts were very well
21 considered.

22 But as your program has evolved,

1 and as this list has lost any of its statutory
2 basis, that's the reason why I believe you are
3 being called at to look at a new list system.

4 CHAIR MOYER: Does anybody else
5 have any questions for Mr. Fiefer while he's
6 in our midst?

7 I don't hear any. Okay, thank you
8 very much. I appreciate your coming and
9 participating.

10 We are adjourned until 1:00
11 o'clock.

12 (Whereupon, the above-entitled
13 matter went off the record at
14 12:01 p.m. and resumed at 1:06
15 p.m.)

16 CHAIR MOYER: Okay, everybody the
17 Board is seated. We have a quorum, and we are
18 officially back in session. If we could
19 please quiet down in the back of the room we'd
20 appreciate that.

21 We will continue with our
22 committee work starting with the Livestock

1 Committee, Hue Karreman, chairman, if you are
2 ready Hue? Please, the floor is yours.

3 LIVESTOCK COMMITTEE

4 MEMBER KARREMAN: Yes, okay.

5 Thank you, Mr. Chair.

6 We have four items for the
7 Livestock Committee to present for discussion
8 here within the Board today.

9 The first one that we've been
10 working on is a petition for propionic acid.
11 Some people call it proprionic acid sometimes,
12 but anyway, we are talking about the same
13 thing. And the petitioner was asking for it
14 to be an animal feed preservative as a mold
15 inhibitor, and briefly to kind of cut to the
16 chase I guess, preservatives -- well, first of
17 all we deemed this to be synthetic, and
18 synthetic preservatives are not allowed under
19 205600(b)(4), which is shown in the cover page
20 there somewhere near, under (d) I think.

21 So it was a unanimous call on the
22 vote. However we did really talk about this

1 quite a lot. And we declined the petition,
2 and that was unanimous. In our discussion on
3 it, however, we looked at the proprionic acid
4 technical review done by S&T as well as
5 another older petition for calcium proprionate
6 that has been reviewed by the Board earlier.
7 And we just happened to see quite clearly the
8 difference of quality in petitions, or
9 technical reviews, I'm sorry.

10 So it just kind of highlighted to
11 us the quality of the petitions. So even
12 though this substance we are not recommending
13 to be allowed, it helped us look at petition
14 quality. I'll leave it at that, because I
15 know tomorrow part of the board will be
16 meeting with S&T about that topic.

17 CHAIR MOYER: That's correct. Any
18 questions?

19 MEMBER KARREMAN: It's a
20 synthetic, preservative, not allowed.

21 MEMBER GIACOMINI: Not all
22 proprionate, proprionic acid, is synthetic,

1 but this was the synthetic form to be listed
2 on 603, so that was what we were looking at.
3 It was requested as a preservative; that's
4 what we were looking at, within those two
5 boxes that this was a fairly easy decision.

6 MEMBER KARREMAN: Thank you, Dan.
7 And there are natural forms of proprionic
8 acid, and of course they would be allowed if
9 they are natural.

10 Okay. The next thing up, is a
11 recommendation for -- I'll have to look at my
12 hard copy here, I apologize -- recommendation
13 to add a new section to the national list for
14 synthetics for livestock. The section is
15 proposed 603(g), formulated injectible
16 supplements of trace minerals for
17 205.603(d)(2). Vitamins per 603(d)(3), and
18 electrolytes per 603 (a)(8), with excipients
19 per 603(f) in accordance with FDA restricted
20 to use by or on the order of a licensed
21 veterinarian.

22 Note that it is for injected forms

1 of those materials which have already been on
2 the list, okay.

3 The reason the committee came up
4 with this proposal is that some certifiers are
5 being selective on injectible vitamins and
6 minerals, usually based on the excipients or
7 the carriers or preservatives, and generally
8 farmers don't really understand that. They
9 see something as vitamin B complex or vitamin
10 C injectible, you know, whatever brand, they
11 are like well, that's vitamin C or vitamin B
12 complex, or whatever. And they, the farmers,
13 are looking at using these injectible type
14 items and minerals for nutritive needs for
15 their livestock.

16 They have been generally allowed,
17 almost grandfathered I guess in a sense. They
18 are widely used, but once some certifiers
19 start kind of picking and choosing which brand
20 names are okay due to excipients and carriage
21 preservatives, then it gets a little bit
22 muddled.

1 And we'd like to clarify that, and
2 that is why we are proposing this section.

3 Basically -- let's see, oh, it is
4 a whole category, and the reason we went that
5 route, there is precedent for that in the list
6 as you all know, 603(d)(2), 603(d)(3), and the
7 excipient ruling, which is actually new at
8 (f), are all category type uses without
9 specific items being listed or not listed.

10 Now the excipient ruling came out
11 just December, 2007, and if I remember
12 correctly there were not many complaints from
13 the organic community about that category
14 heading coming in.

15 And so that is why part of the
16 reason we are looking at adding a whole
17 category. The other reason is that in doing
18 some homework on this I think I counted up
19 very easily about 24 different manufacturers
20 of vitamins and minerals, injectible vitamins
21 and minerals. And their processes of making
22 the injectible vitamins and minerals are not

1 necessarily obtainable. The formulation
2 processes to make injectibles are generally
3 only obtainable when they are in the public
4 domain from patents from the 1950s through the
5 1970s, and maybe through the '80s, And the
6 injectible vitamins and minerals that a farmer
7 may have in his cabinet right now today may
8 not use that process.

9 So I did not feel that that would
10 lead to a final conclusion on this, and in
11 relation to the other three categories,
12 categorical allowances under (d)(2), (d)(3)
13 and (f), a new section (g) was and is being
14 proposed.

15 On public comment generally they
16 were all positive. There were some concerns
17 of course. But VOF had one of their -- I
18 don't know what VOF exactly stands for. I
19 know it's the Vermont Organic Group. They
20 wanted to amend the -- in the very last
21 sentence that they thought it was too
22 stringent to have a veterinarian only order or

1 administer the injectible vitamins and
2 minerals, and they would like to see it
3 restricted to use by any person trained in the
4 administration of the injectible supplement.

5 And let's see here, generally in
6 favor, but then there are some people like
7 yesterday during public comment that do want
8 to see every injectible vitamin and mineral
9 TAP reviewed; at least that was my
10 understanding from public comment yesterday.

11 PCO would like that, and I think
12 Harriet Behar had mentioned that. OTGO in
13 Oregon supports the proposal as is. Kelly
14 Shea is in favor of it as well, and has some
15 extra comments relate to it but not directly
16 so. And CCOF was supportive of it, however
17 they would like to add the term as nutritive
18 supplements in the beginning of the statement.

19 The reason -- and then I think VCO
20 was mentioning that perhaps this should go
21 under Section A, the medications clause, in
22 603. The reason we don't want to put it under

1 the medications clause is that we had an hour,
2 hour and a half long conference call, the
3 Livestock Committee, with some NOP input as
4 well as the FDA Center for Veterinary
5 Medicine, and the moment you start making
6 claims or insinuating medical treatment about
7 these injectible vitamins and minerals, it
8 kind of crosses the line from being
9 nutritional supplement type material into
10 actual treating disease, and that triggers
11 some extra FDA input. And so we would -- the
12 reason we had that conference call with the
13 FDA was to get ahead of things, this time,
14 instead of the medicines that were approved in
15 2007 where there was a lot of back and forth
16 for a number of years. And they fortunately
17 got approved, but we would like to prevent
18 excessive time going by, because these
19 injectible vitamins and minerals are commonly
20 used as everyone does acknowledge.

21 So that's pretty much the
22 injectible vitamins and minerals document

1 round up. Yep, Dan.

2 MEMBER GIACOMINI: Yes, Hue. I
3 believe it was CCOF made a comment, we
4 unfortunately have not had a chance to go over
5 it, but I'm wondering if you have with any
6 other members of the Livestock Committee,
7 regarding listing this being a nutritional
8 supplement listing including excipients which
9 the language on the excipients is specifically
10 for drugs. Did you ever come up with a way of
11 clarifying that?

12 MEMBER KARREMAN: Good point. The
13 -- what CCOF said on top of their kind of
14 three word beginning of, as nutritive
15 supplements, formulated injectibles, they also
16 did mention that the excipient wording in (f)
17 the word drug should be replaced with
18 something other than that like health care
19 items. And the reason being that the NOP rule
20 says that you cannot treat animals in the
21 absence of illness, except for vaccines.

22 And these are nutritive

1 supplements for whatever reason they are being
2 used, and I think that is what they would like
3 to see so that animal health care products --
4 and this does dovetail into animal welfare
5 which we'll get into -- are allowed if their
6 carriers or whatnot are GRAS, if they are FDA
7 approved food additives, or they are part of
8 an NADA new animal drug application
9 formulation.

10 And I believe there was another
11 comment regarding the excipients as well if we
12 are going to look at that, which was
13 overlooked in the 2007 edition, that the
14 excipients we were looking at compounds at
15 that point in that petition process that were
16 all of them happened to be FDA-type compounds
17 with FDA oversight, but there are other ones
18 with USDA oversight, through the APHIS, Animal
19 Plant Health Inspection Service, their
20 excipients for vaccines and biologics that we
21 should add into that excipient clause as well.

22 So I don't know if we can open up

1 the excipient clause at this meeting. It is
2 germane to the injectible vitamins and
3 minerals, but I don't know if we can.

4 MEMBER GIACOMINI: I'd certainly
5 like to hear from the program. My impression
6 would be that this being the national list and
7 that being a separate listing that that may
8 cause a problem in trying to have a
9 recommendation to add a listing and amend a
10 listing at the same time, but if we could hear
11 from the program.

12 CHAIR MOYER: Richard, would you
13 care to comment, please?

14 MR. MATTHEWS: You could go ahead
15 and discuss at this time, but you can't take
16 any action because it wasn't on the agenda as
17 an action item. So you can talk about what
18 you want to do for the next meeting. But it
19 does need to be addressed; we are aware of it,
20 and we encourage you to go ahead and address
21 that issue.

22 MEMBER GIACOMINI: So we can say

1 that our intent will be once the excipient
2 language is corrected that this is for all
3 nutrient supplement vitamins and minerals that
4 are not restricted by FDA.

5 MEMBER KARREMAN: Yes, it would
6 include the excipients that are regulated by
7 FDA as well as APHIS. That is the intent.

8 MR. MATTHEWS: Which by the way
9 was the intent was to cover everything, but
10 what happened was that we failed to make sure
11 that all those that were regulated by APHIS
12 were included. But it was always the intent
13 of both the Board and the department that the
14 excipients cover everything. But there is the
15 technicality that because of the wording in
16 the statement that we cleared through FDA that
17 it didn't include APHIS.

18 MEMBER KARREMAN: And that was
19 actually part of my fault being the petitioner
20 for them for not also looking at that.

21 MR. MATTHEWS: No matter what the
22 fault, the bottom line is that we always

1 intended it to apply to everything, but it has
2 been brought to our attention that there are
3 some that we didn't adequately cover.

4 MEMBER KARREMAN: So I guess we
5 can take action, and we will, on this
6 recommendation. And only change any wording
7 from public comment or how we see it needed on
8 the actual proposed language addition for the
9 category; not the excipient language, although
10 that will be on the work plan; it has to be
11 now for the next meeting.

12 Any other questions?

13 CHAIR MOYER: Okay, next item.

14 MEMBER KARREMAN: The next item on
15 the list there is aquaculture, and I'm happy
16 to say that Jennifer Hall will be addressing
17 the discussion document with the bivalves.

18 MEMBER HALL: Thank you, Hugh.

19 Thank you, Mr. Chair.

20 I am presenting where the
21 Livestock Committee is with its progress on
22 the proposed organic standards for bivalve and

1 mollusc production. And I think everyone saw
2 both of the documents that were posted on the
3 agenda. First, the kind of status report of
4 where the Livestock Committee is in its
5 discussions, and kind of trials and
6 tribulations with trying to figure out where
7 and how the bivalve mollusc production fits
8 with organic standards.

9 And then the AWG's response to
10 those five points of concern or further
11 exploration. Those five points, just to
12 reiterate, are feed control, water quality
13 input, control of harvest sediment, using
14 sanitation measures as indicators, and
15 containment.

16 I want to say before I go into it
17 that I am personally really glad to be
18 presenting this on behalf of the Board. Our
19 committee has worked with the AWG to really
20 try to understand this whole new arena of
21 organic food production, that aquaculture
22 represents. And with their patience and

1 continued efforts to educate us, we continue
2 to learn more and get better at asking the
3 right questions and exploring areas of
4 concern.

5 We appreciate the frustrations
6 this might create, and are grateful for the
7 aquaculture working group's consistent
8 availability and patience.

9 Comments on what has been posted
10 have been pretty sparse, which just kind of as
11 an opening I think reflects the lack of
12 experience on these topics in the organic
13 community as a whole in the U.S.

14 And so I for one hope that our
15 capacity to respond, approve and recommend
16 upcoming topics of this nature is enhanced by
17 the addition of the board member in this
18 present round of recruitment that brings his
19 expertise a little bit more. It's been
20 difficult for all concerned to kind of rifle
21 through it, and our ability to deal with it
22 would clearly be enhanced if there were

1 someone who would better represent the
2 community as a stakeholder.

3 I participated in a number of the
4 conversations that the AWG had on the phone as
5 the document was coming together originally,
6 and definitely came to appreciate several
7 things. The dedication of the group of
8 professionals involved, the struggle that
9 present law to accommodate the productions of
10 some that is proposed, a true desire to create
11 standards that actually do raise the bar,
12 versus conventional bivalve mollusc production
13 and a great understanding of the already
14 stringent requirements on this type of
15 production.

16 The AWG has made it a priority to
17 establish measurable opportunities to make
18 their production more organic, from origin of
19 life to siting to control of contaminants, the
20 proposal does make advances in production
21 techniques more suitable to the goals of
22 organic ideals.

1 And in fact of course as you must
2 know it even goes so far as to stipulate
3 transport requirements and addresses a bit of
4 consumer fraud that doing that incorrectly
5 could lead to. So it actually did go through
6 quite a rigorous process, and took to hear the
7 desire for an organic model to be adopted
8 where they needed to be better than
9 conventional production.

10 So I just kind of want to go
11 through the points quickly, and just again
12 kind of get the staff's report a little bit
13 beyond what was mentioned in our document.

14 Number one, with feed control, I
15 would say that a number of items of concern.
16 These five were shared back with AWG and the
17 organic community. But I would say that it is
18 this one that probably represents the largest
19 hurdle, and greatest area of concern. And
20 that it is I think an evolving conversation.
21 We definitely appreciate the AWG's response to
22 this and other points, and we will take that

1 in general it's just -- it's difficult for us
2 to kind of wrap our heads around -- if it's in
3 the livestock area, and typically with most of
4 what we deal with there is a greater level of
5 control over what the animals are eating than
6 in this scenario. So I think it makes it a
7 little more fluid, and when you talk about
8 organic and its management and factoring that
9 into an OSP that just got regular in and out
10 of water and nutrients that these bivalve
11 molluscs would be intaking, it's just a bit
12 hard to figure you could kind of truly manage.
13 And I think that that, and the fact that it is
14 not necessarily certified organic feed, that
15 would be going into them as well.

16 So I would say that that is
17 probably the number one issue that still
18 remains.

19 On water quality, the siting
20 requirements definitely do add much more rigor
21 than -- since there are very few in
22 conventional production, the stipulations that

1 they have for really looking at your entire
2 environment, and whether or not it is
3 appropriate for this type of production, it
4 has added considerable merit to -- or
5 considerable value to actually having it be
6 organically certified, and looking at the
7 impacts of that siting, not just on the item
8 being produced, but as with all of the
9 conversation about biodiversity the impacts on
10 that farm as it were on surrounding community
11 of life.

12 So -- and I think we've kind of
13 gotten stuck a little bit in this new category
14 of production, of aquaculture, and in an
15 effort to understand it better, and not to
16 keep drilling -- Katherine's words -- but
17 definitely kind of looking at the perfect
18 versus the greater good scenario.

19 But you know we get that
20 management, and all of organic management
21 doesn't necessarily insinuate 100 percent
22 prevention. And that we need to continue to

1 dialog about where the management is
2 consistent with the label, not just prevention
3 and trying to protect everything; that in
4 farming, in terrestrial, definitely we have an
5 impact. We till fields, we do things that
6 have effect. So to insinuate that we wouldn't
7 in this sort of -- in aquaculture production
8 would be kind of out of bounds really.

9 On control of harvest sediment,
10 similar but also I think we were looking for
11 some feedback on how much is too much, and
12 that fortunately the AWG did recommend several
13 prohibited practices that really do stretch
14 the habitat. And that is good; I think we
15 were looking for perhaps a little bit more,
16 that there were still some that were feeling
17 like they were on the line. And just kind of
18 using geoduck as an example that the
19 extraction of it seems pretty intrusive to the
20 environment. And so maybe instead of coming
21 forward with a common united front, which we
22 totally understand the committee's desire to

1 do that, that there may be a need to identify
2 certain species either from a production or
3 from a harvest perspective that just don't
4 quite qualify; something about how they need
5 to be produced and/or harvested, it just
6 doesn't work with the bigger picture.

7 On sanitation the hydrologic zone
8 of influence, and really defining that along
9 with coastlines and following even the current
10 existing regulations they have to follow, they
11 adequately gave us more information I think
12 that we were seeking on that, and I think that
13 even if you with all of these points
14 containment as well, I sort of came full
15 circle as I was thinking about it yesterday.
16 And it's interesting, because we have
17 approached the entire conversation from the
18 framework of livestock of course, because
19 that's where it was coming to us, and that's
20 what we were asked to do, and it made sense in
21 our conversation. But we asked them, we asked
22 AWG to put together that great chart, so it

1 could be really a lot more clear and really
2 illustrate the differences between
3 conventional bivalve mollusc production and
4 what they are suggesting. And I am very
5 grateful for that. I think it really did
6 start to drill down to a level of
7 comprehension that was really easier to absorb
8 and to really identify those distinctions.

9 And as I went through it I
10 personally started to think about the whole
11 conversation in just a little bit different
12 way. Not that I am suggesting that we punt
13 this issue from our committee, but that if you
14 really think about what bivalve molluscs are,
15 and the AWG has brought this up, that they are
16 analogous to plants, on terrestrial, that
17 plants are kind of filters of the air; that
18 bivalve molluscs have always kind of been
19 filters of the water. And so the passing
20 through of fluid with all this other
21 management to try and control for the quality
22 of that fluid going through, that perhaps it's

1 using just a little bit of a different
2 framework of thinking about it, and I'm not
3 settled with it. But it definitely brought me
4 to a point of looking at it from a different
5 perspective, and allowing for it to kind of
6 sit in our discussions when we take it back to
7 committee in a different way.

8 So I would like to talk about that
9 with my committee members when we revisit it
10 a little bit. I don't think it's out of the
11 realm of possibility, and I definitely
12 appreciate the work and, again, the patience
13 of the aquaculture working group to help get
14 us to this point. It has been much
15 appreciated.

16 So our call really in kind of
17 providing this update is to let you know we
18 haven't put it to the side at all. There have
19 been other issues we certainly needed to
20 address in the meantime. But it is a really
21 deep and ongoing conversation that we have
22 just tried to get more information about.

1 And so this is kind of another
2 phase of that conversation, but we do hope
3 with these answers I think to come back with
4 a more solid recommendation next time.

5 So any input, please. Questions?

6 CHAIR MOYER: I think the Crops
7 Committee doesn't want it dumped on them.

8 (Laughter.)

9 No other questions?

10 Next item, Mr. Chairman.

11 MEMBER KARREMAN: Okay, thank you
12 very much, Jennifer. And I just want to
13 reiterate, we really have talked about the
14 bivalves quite a lot, and we really appreciate
15 as you mentioned the AWG's response to our
16 questions and hopefully we could have maybe a
17 recommendation for the November meeting. That
18 is the plan.

19 So the next topic is proposed
20 organic animal welfare guidance and standards,
21 animal health and living conditions. We took
22 this up, this has been on the work plan for a

1 couple of years now, and as Deputy Secretary
2 Merrigan asked how long has it been, about two
3 years. And she used the term for this, the
4 animal welfare. Let's not make the perfect
5 being the enemy of the good, and therefore go
6 for the long-hanging fruit.

7 And she did use that in terms of
8 animal welfare, just to keep that straight.
9 I know it's a great term for everything, but
10 it was in terms of animal welfare.

11 So she brought that up with
12 Margaret Wittenberg two years ago at the
13 November, 2007 meeting, when we had the
14 agriculture symposium. That was kind of a
15 different issue. And basically so we are
16 looking at this partly due to that, but also
17 because the conventional dairy sector is
18 addressing animal welfare, and I just really
19 believe that the organic sector needs to be on
20 a par at least with the conventional sector
21 especially in this topic and perhaps a little
22 bit more if only -- well if only for that

1 reason, but also to ensure the organic
2 customers of organic dairy products that the
3 animals that are producing the product are
4 being well taken care of.

5 And I guess as kind of a slight
6 secondary or maybe tertiary to help ensure
7 that some of the NGOs that are focusing on
8 animal agriculture and kind of taking aim at
9 it, you know, can't take aim too easily at
10 organics. I want to ensure that we have the
11 wording in place in case it's ever looked at
12 closely.

13 So basically we have presented
14 this and there are in consultation I guess
15 maybe informally with the program if this was
16 a few years ago I guess out in maybe during a
17 break, that you know if we feel we need to
18 make any regulatory changes, try and keep it
19 very short, the words, not big paragraphs of
20 things. And so a few, there are a few items -
21 - well, let me back up.

22 We basically in section 238, which

1 is the health care section, you know there are
2 some questions that come up even with what is
3 written now in the regulation. Such as it is
4 required at a feed ration sufficient to meet
5 the nutritional requirements of being fed.
6 But is it? How do the animals look? And like
7 public comment addressed yesterday in a
8 positive way we are trying to show objective
9 metrics, endpoints, goals, so that inspectors
10 can verify that the animals are indeed being
11 well taken care of.

12 Also in other parts of 238, some
13 other questions come up that the regulations
14 currently as they are don't necessarily ensure
15 that the animals are clean or not lame or
16 whatever. So we are trying to address those
17 kind of things.

18 As far as regulatory changes, one
19 that I always cite is 239 under livestock
20 living conditions, let's say. You know,
21 (a)(3), that appropriate clean dry bedding is
22 provided, and if the bedding is typically

1 consumed it's got to be organic and whatnot.
2 But it doesn't necessarily ensure that there
3 is a lot of bedding, or any bedding, or much
4 bedding, and are the animals clean, okay.

5 And as well as for access to the
6 outdoors, shade, shelter, exercise areas,
7 fresh air and direct sunlight suitable to the
8 species in (a)(1). In the case of poultry
9 what kind of access to the outdoors and what
10 areas have direct sunlight. I know I'm
11 jumping around a little. But it's only a
12 discussion document okay.

13 So there is just basically some
14 unresolved or -- not unresolved, but just some
15 issues that perhaps need clarification.

16 The public comment on this has
17 been generally good. I haven't seen a public
18 comment of anyone being opposed to animal
19 welfare; that's a good thing. But of course
20 there were concerns raised yesterday regarding
21 some of the guidance that we are also
22 proposing to describe how the animals look,

1 lameness, fur coat, feathering and whatnot.
2 And how we need to look at the realities of
3 different stages of lactation for dairy cows,
4 and how they change, and body condition, and
5 we are well aware of that and will be working
6 on that, and how dairy is different from beef
7 cattle. And the food farmers have nicely
8 submitted their comment, and given pictures of
9 dairy cows and how they -- and body condition
10 scores that perhaps we can add in for guidance
11 if we can.

12 One of the concerns we heard
13 yesterday, and also in writing was about
14 inspector training, because it is the
15 inspector who ensures the system is working
16 within the OSP and every thing. So the
17 inspector training we should address more as
18 well as there were concerns about having to
19 look at every animal or every chicken, and I
20 mentioned yesterday in response it's kind of
21 to look at the big picture, and not get hung
22 up on the minutiae, at least in animal

1 welfare, unless there are obvious problems;
2 then they shouldn't be ignored.

3 And that's why we are trying to
4 make sure that if there are obvious problems
5 that they are not going to be ignored.

6 The food farmers, Ed Maltby who as
7 here wanted to have a task force on animal
8 welfare. I think informally the Livestock
9 Committee members I've talked with don't
10 really want to see a task force get started on
11 this, because we don't -- I guess we believe
12 we can get their input as well as any other
13 people's input on our Tuesday afternoon
14 conference calls. And let's see, th AVMA
15 submitted a comment, the American Veterinary
16 Medical Association, as well. And that will
17 be put into the public record at some point.

18 They want to make sure that there
19 is a valid client-patient relationship,
20 veterinarian for the farm, to make sure that
21 indeed the animals are being well taken care
22 of from a third party standpoint, on top of

1 the organic regulations.

2 And both the ABMA and the food
3 farmers refer to the National Dairy Animal
4 Well-Being Initiative being started by the
5 conventional industry. So we will look at
6 that as well.

7 I could go on and on. I mean
8 animal welfare is a major big issue, just the
9 whole topic, philosophy; but that about sums
10 it up for now in our discussion document; just
11 so people know, we are taking public comment
12 without doubt, and it will be definitely
13 infused into the document.

14 CHAIR MOYER: Thank you, Hue.

15 Are there questions or comments
16 for Hue on animal welfare? Kevin?

17 MEMBER ENGELBERT: There is one
18 specific area that we really are looking for
19 public comment in, and that is the outdoor
20 access to poultry, and where the industry and
21 where the Board wants to go with that.

22 We heard yesterday from the

1 methionine task force, and the efforts of that
2 task force are simply to come up with
3 methionine that is not synthetic that will
4 allow the current production standards to
5 continue. And we need to hear from the
6 community. Is that what we are really after
7 with the outdoor access for poultry, and what
8 the response should be from the Livestock
9 Committee to this issue.

10 MEMBER KARREMAN: Good point,
11 Kevin. I mentioned it briefly, but thanks for
12 bringing that up again.

13 CHAIR MOYER: Dan.

14 MEMBER GIACOMINI: Yes, I've heard
15 a lot of -- a fair amount of formal here and
16 informally of concerns from certifiers and
17 various groups on the scoring systems that we
18 are listing here and using those types of
19 things.

20 A lot of concern that there is not
21 going to be adequate training; that it is
22 going to be too difficult to do, like Hue

1 mentioned of having to look at all the
2 animals.

3 And I've done body condition
4 scoring for 30 years, and it's definitely
5 evolved. But in doing it it's obvious that
6 what we are looking at here is not an overall
7 evaluation of the body condition of hurt
8 animals. We are looking for the outliers; we
9 are looking for the problems.

10 And I think when we go back and we
11 do this document -- work this document over,
12 on the body condition scoring we are really
13 worrying about the ones and the fives; we are
14 worrying about the cows that are skin and
15 bones and tremendously -- grossly obese.

16 When we are looking at the
17 lameness scoring, we are looking at the
18 animals that are for the most part
19 significantly obviously lame. Whether the
20 animals that are not visually lame are a one
21 or a two, maybe a three, that is not going to
22 matter. Because what we are trying to do here

1 is find a mechanism to find the problems, and
2 to improve them.

3 And just like when we start
4 looking, and another item we've talked with
5 Temple Grandin on is on hoof lesions and body
6 lesions, hips and legs and all that kind of
7 stuff. It's going to be that same thing.
8 It's going to be giving a tool to help you
9 find and identify the problem.

10 You are not going to have to go in
11 and evaluate all the animals and say, 10
12 percent, 30 percent, 60 percent, it's going to
13 be how much of a problem, and over time are we
14 working -- are the producers working to
15 improve and lessen that problem.

16 I think that is where we are going
17 here. So the discussion like on body score,
18 oh, we don't have enough training to look at
19 that, and on and on. Believe me, I can sit
20 down with somebody in front of three or four
21 cows, if I can pick the cows out that we are
22 looking at, you give me the chance to pick

1 four cows, I can show you in about five
2 minutes how to do body condition scoring that
3 is the only thing you will need to worry about
4 in discussing this type of project.

5 So it's not going to be that hard
6 of a process.

7 CHAIR MOYER: Back to you, Hue.

8 Or --

9 MEMBER SMILLIE: I don't usually
10 ask livestock questions. But are you guys, in
11 looking at this, are you looking at stocking
12 densities at all as part of this? As a metric
13 of --

14 MEMBER KARREMAN: Not in relation
15 to dairy cows, I don't think, because that's
16 in a pasture rule.

17 MEMBER SMILLIE: I'm thinking
18 more about poultry.

19 MEMBER KARREMAN: Well, you bring
20 up an idea, Joe.

21 MEMBER SMILLIE: Because that, I
22 think, I don't want to show my ignorance, but

1 the Canadians, which we are having an
2 equivalency agreement, aren't they working off
3 that?

4 MEMBER KARREMAN: They absolutely
5 are. I've been to Canada a bunch lately and
6 they are; they told me that.

7 Kevin?

8 MEMBER ENGELBERT: Yes, Joe, they
9 are, that's why I asked the question of the
10 presenter yesterday about what his densities
11 were, the areas of outdoor access, things like
12 that. Yes, it will be part of what we look
13 at.

14 MEMBER KARREMAN: Just one last
15 thing. Also you know thank you Dan, for those
16 comments; very succinct, and now I can just go
17 off on tangents on this particular topic,
18 because I'm out in the trenches everyday on a
19 lot of farms.

20 But you know -- you are too,
21 exactly -- but I want to just make sure that
22 people know it's not, at least from my

1 viewpoint, it's not like if you can do
2 something in organics. I mean organic
3 agriculture is part of agriculture. And it's
4 not if you can do something with your animals;
5 it's how you do it. That's also what we want
6 to look at. As far as procedures done, making
7 sure that proper anesthesia is done, which is
8 why exactly I petitioned for those medicines
9 to be allowed to reduce pain and suffering.

10 And that plays in, which I didn't
11 even mention, to 238 (c)(7) which is to make
12 sure that animals are treated in a timely
13 manner. And that is what Dan was basically
14 talking about, make sure that the obvious
15 problems are not happening over and over. And
16 if you see something, then the inspector can
17 say, okay, here is the line here. This
18 doesn't fly. And then it has to be addressed.
19 Because some inspectors have told me, like I
20 said yesterday, they leave a farm and they
21 kind of know something is wrong, but they
22 can't put their finger on a reg or a guidance.

1 And that's why we want to make sure that the
2 extremes are not happening.

3 CHAIR MOYER: Thank you, Hue. I
4 believe we are prepared to move on to our next
5 point of order, which would be the Joint
6 Materials and Handling Committees, co-chairs
7 Dan Giacomini and Steve DeMuri. I'm not sure,
8 Dan, Steve? Dan's got it.

9 JOINT MATERIALS AND HANDLING COMMITTEES

10 MEMBER GIACOMINI: I take the
11 ball from Steve, and I pass it on to Katrina.

12 MEMBER HEINZE: Well, thank you.
13 I'm not passing it on -- well, at least for
14 the first part.

15 I know that we have heard a lot on
16 this subject of definition of materials over
17 the last couple of years. And I appreciate
18 the diligence of my fellow board members. I
19 know I have heard from several of you
20 privately that you are sick and tired of this
21 subject and just wish it would go away, and it
22 is so esoteric.

1 But it is a foundation for many of
2 the decisions that we make, both as a Board,
3 and more importantly, that the certifiers are
4 making, and that our farmers and producers are
5 making everyday.

6 So we have 45 minutes for this
7 subject. We will try to get through it in a
8 timely way.

9 There are two things: I will be
10 reviewing the discussion document on the
11 definition of materials that the Joint
12 Committee prepared. I'll try to take 10 or 15
13 minutes for that. And then we've got a
14 presentation by the material working group,
15 and then we should have plenty of time for
16 discussion.

17 So with that, to get to our
18 discussion document, the classification
19 materials has been debated since before OFPA.
20 But really it's been the last couple of years
21 where the NOSB has actively reengaged in this
22 subject. And there have been a number of

1 recommendations. There has been a ton of
2 public comment. And there has been lots of
3 thoughtful debate.

4 The Joint Committee got together I
5 think about a year ago to review all these
6 discussions, all of this input, all the
7 information that the material working group
8 has given us. And our goal is to have a
9 recommendation for a decision at the November
10 meeting.

11 So really the purpose of our
12 discussion document was to solicit public
13 comment and discussion from the Board to guide
14 us as we develop our November recommendation.

15 I do want to acknowledge the
16 material working group. They have put a ton
17 of time over the last year into this subject,
18 and particularly you will see the presentation
19 on synthetic-nonsynthetic, they met every
20 Monday for an hour and a half and had intense
21 debate on this subject. So I do want to
22 recognize the amazing contributions made by

1 those folks.

2 So a bit of background for that.

3 The final recommendation on this topic has
4 proved elusive due to very specific materials
5 that illustrate gaps in the current and
6 proposed definitions.

7 I think a great example of that is
8 all the discussion we had with lecithin
9 yesterday. You know does it belong on 605(b),
10 does it belong on 606, which form, which
11 source, which this. And we always have those
12 kinds of materials that befuddle us is
13 probably the right word.

14 We have heard a number of public
15 comments and certainly this has been
16 acknowledged by many of us who are intimately
17 involved with this, that there is resounding
18 agreement on virtually all the materials.

19 It is really just the few that
20 continue to confound us. And it is those few
21 that lead to inconsistent decisions, and the
22 perception of inconsistency in the regulation.

1 And they get used as examples to demonstrate
2 why consumers shouldn't have confidence in
3 what we do.

4 So that is really what we are
5 aiming to get at.

6 Our goal, connected to that, our
7 goal in developing a recommendation is not to
8 rewrite the national list. We expect that our
9 recommendation will confirm and support the
10 vast majority of decisions, and certainly that
11 is our intent.

12 Okay, so we have worked to look at
13 all these comments and all the information we
14 have been provided. And there are some things
15 that we do agree on, while there are some
16 things that we still disagree on. So I wanted
17 to kind of highlight for you where there is
18 agreement and where there is disagreement.

19 First we agree that a material is
20 defined both from its source and the process
21 used to make the material. So lecithin, since
22 we are so familiar with that we use that as an

1 example, lecithin, made from soybeans, we all
2 agree that soybeans are an agricultural
3 material. So their source is agricultural.
4 But depending on how you process it, it could
5 remain agricultural, or it could kind of lose
6 that in its final classification. And there
7 are certainly some other examples as well.

8 Currently on the list is pectin,
9 again, sourced from apple peel; pretty clear
10 that that is agricultural. But if you --
11 let's see, if you extract it with hexane and
12 then chemically modify it with ammonia, to
13 make it -- and Joe, you will have to jump in
14 here to make sure I get it right -- but to
15 make a low methoxy pectin, it's listed as
16 synthetic. So it is both source and process.
17 And in general the joint committee agrees that
18 both of those need to be considered when
19 deciding on the final classification of the
20 material.

21 So because of that, because source
22 and process matter, we generally agree that a

1 single material, pectin or lecithin, can exist
2 in multiple places on the list. And it exists
3 there because of either source or process.

4 Let's see. So then that brings us
5 to an area where we disagree. So that would
6 be the matter of microbes, what we call
7 microbiological materials. And we are still
8 working on that, on the wording on some of
9 this, or the products of microbiological
10 fermentation.

11 I want to acknowledge to our
12 fellow board members, those of you who haven't
13 been in these conversations and to the public,
14 we are greatly divided on this subject. We
15 have been divided on this subject for many
16 years, and we continue to be, and we know we
17 need to make a decision and come forward with
18 a recommendation that is a decision, despite
19 our great division.

20 So the division really stems from
21 two things. Some of the committee members
22 want to find a path to encourage the use of

1 organic inputs and prevent where possible the
2 use of synthetics. I think most of us agree
3 with that, but struggle to find a path to do
4 that.

5 Others feel that these materials
6 are used in such a small percentage, that
7 organic integrity is not greatly compromised
8 by their inclusion, and we should not let
9 these few very small use materials get in the
10 way of making a decision.

11 So in our discussion paper we
12 presented two alternative recommendations that
13 we were discussing and asked for public
14 comment to help us with these two options.

15 So one option is to leave these
16 microbiological materials or the products of
17 their fermentation where appropriate, to leave
18 those on 605, and then use annotations to
19 encourage the use of inputs that we felt were
20 appropriate, or to restrict inputs that we
21 didn't want to use. So that is one option;
22 leave them as non-ag, and use annotations to

1 encourage the kinds of behaviors and
2 processing that we want to encourage.

3 The second option would be to
4 define these as agricultural, but to say that
5 at this time they can't be certified organic
6 because the standard for their production does
7 not exist.

8 A third option was presented by
9 public comment yesterday, which would be to
10 leave them on 605, but to say that certified
11 organic options did exist, similar to natural
12 flavors as they exist today; so that was a
13 third option that we did not have in our
14 discussion document.

15 So we requested public comment,
16 and we do appreciate, we got a handful of
17 those, and we know that we will get more. So
18 I wanted to highlight for my fellow Board
19 members the questions we asked.

20 So we had three areas of
21 conversation that we wanted public comment on.
22 The first was, we wanted specific examples

1 where organic principles would be upheld or
2 organic consumer expectations would be better
3 met through a clarification of the definition
4 of materials. And this was really an attempt
5 to understand why we were working on this, and
6 why there was so much public interest at our
7 meetings on this topic, and to really figure
8 out what is it we are trying to fix to make
9 sure that our recommendation actually fixes
10 what we are trying to fix.

11 The second question related to
12 that is what do the members of the organic
13 community hope to see accomplished by
14 clarifying the classification of materials.
15 What will be prevented, and what should be
16 encouraged. Again this is a bit of an
17 esoteric topic, and for us to spend so much
18 time on it we want to make sure that we are
19 actually improving things.

20 And then finally specific to the
21 microbes and products of microbiological
22 fermentation, we really wanted to understand

1 the benefits and drawbacks of each of our
2 options that we presented, to understand the
3 unintended consequences resulting from either
4 or both of them.

5 And then we wanted to better
6 understand, one of the things that does come
7 up and that we discussed yesterday specific to
8 yeast is their use in livestock feed. So we
9 wanted to understand what would be gained if
10 the materials were to be agricultural, should
11 they -- when they are used in livestock feed,
12 should they be required to be 100 percent
13 organic? And then what were the economic
14 implications if they are required to be
15 organic and used in livestock feed.

16 So those were our questions. So
17 just to wrap up I wanted to let you know what
18 we have heard so far from the public. We got
19 five or six really detailed public comments on
20 this subject that I would encourage everyone
21 to read as we move forward in our
22 conversations.

1 Every commenter said that we do
2 need to keep working on this, and that
3 resolution on this discussion was needed to
4 improve consistency in decisions, and to
5 increase the transparency, particularly for
6 things that aren't on the list, on the
7 national list of crops and livestock materials
8 that are determined to be nonsynthetic, so
9 those decisions are made not very
10 transparently, so if we have a very consistent
11 process the public comments felt that that
12 would be important.

13 Several of the commenters noted
14 that most materials are classified by the
15 certifiers when deciding whether materials
16 allowed for use in crops and livestock. So I
17 wanted to specifically read what one commenter
18 wrote.

19 They said the lack of clear
20 criteria is causing inconsistent decision
21 making throughout the industry. This leads to
22 certifier shopping, embarrassment, lawsuits,

1 headaches, disenchanted organic consumers, and
2 constant complaining.

3 So then I did want to thank those
4 folks who commented and gave us a list of the
5 problematic materials for us to use as we
6 evaluate our recommendation.

7 We did have one commenter who
8 reminded us that for synthetic and
9 nonsynthetic the decision is most always
10 clear. The real debate is whether the
11 material should be listed or not. So they
12 didn't want us to confuse this question of
13 where does it get classified with where should
14 it get listed; that those are very separate
15 decisions. And I think that is an important
16 point that I think has muddled our
17 conversation, that we have perhaps been leery
18 of having things end up being synthetic,
19 because then, oh, they are not going to be
20 listed. Or conversely if something is
21 nonsynthetic, well then it is automatically
22 going to be used, that we do have a mechanism

1 to allow or prevent use of materials. So I
2 thought that that was a comment to keep close
3 to our thoughts.

4 So then while they agreed, while
5 our commenters unanimously agreed that we had
6 work to do in this area, and that they really
7 wanted a decision, they of course disagreed
8 greatly on the direction that our solution
9 should take.

10 We had commenters who disagreed on
11 our perspective on agricultural synthetics,
12 and that actually you could have an
13 agricultural synthetic that was allowed. We
14 had one commenter who supported the idea that
15 wasn't in our discussion document but had been
16 suggested by the material working group in
17 November, that we merge 605 and 606, and apply
18 commercial availability to the entire list.
19 So that is something for us to consider.

20 One commenter cautioned us to
21 really carefully evaluate the options, because
22 they felt that particularly in the area of

1 synthetic and nonsynthetic that the suggestion
2 that you will hear from the material working
3 group would cause a lot of previously
4 classified nonsynthetic materials to move to
5 synthetic. And you heard some of that in
6 public comment yesterday as well.

7 I did want to highlight the
8 suggestion that was made yesterday, that we
9 should limit the definition of synthetic to
10 materials sourced from petrochemicals, so that
11 is out there as well. What I would say is all
12 the comments that have been provided have been
13 very thoughtful, and we do need to really
14 buckle down and think about them and
15 understand them, and make some decisions.

16 Specific to our friends the
17 microbes and their products, the commenters
18 were as divided as the committee. In general
19 they said the unintended consequences are
20 difficult to predict. Both options have
21 merits and drawbacks. One commenter preferred
22 the second option; someone else preferred the

1 first option. So again we need to spend time
2 on that.

3 So I want to wrap up by saying
4 that there is strong agreement from the
5 public, and board members, that we need to
6 make a decision and we need to put this behind
7 us and get to consistent decision making.

8 I think we all heard the commenter
9 yesterday, and I appreciate this comment
10 greatly, that said, just make a decision. I
11 don't even care if it's the right decision.
12 Right, consistency is better than
13 inconsistency I think is how I would summarize
14 that.

15 We acknowledge that there are
16 considered differences of opinion and now it
17 is our job. We can't hand it off to the
18 public anymore. It is our job as the NOSB to
19 make a decision. Some people will like our
20 decision; some people will not like our
21 decision. And I think this serves as my
22 public advisory comment, whatever it is, those

1 ads that you see on TV, to my fellow board
2 members, that that is our job.

3 So we are going to go. We are
4 going to consider everything we've heard, and
5 we will make a decision, and we appreciate
6 those of you who will continue to be in dialog
7 with us on that. And we appreciate everyone's
8 active participation.

9 So we will have a recommendation,
10 for better or for worse, right or wrong, but
11 it will be consistent, at the November
12 meeting.

13 So the specific things that we
14 know we need to work on, so you will know what
15 to expect. We will be working with the
16 program to determine feasibility of a couple
17 of things. The feasibility of using
18 annotations for items that are currently on
19 the list to clarify their sourcing process.

20 So is that feasible? Is it not
21 feasible? If that is our recommendation, how
22 do we get from here to there?

1 The idea of how feasible would it
2 be to apply commercial availability to both
3 605 and 606. We have heard that several
4 times. I know that it is an idea that gets a
5 lot of good discussion that people are very
6 interested in. So we want to understand, is
7 that really an option available to us.

8 We will develop a decision tree
9 that could serve as guidance for determining
10 the classification of materials, which reminds
11 me, there is one really important concept I
12 forgot to talk about, so I'll get back to that
13 in a second.

14 And then finally we will finalize
15 our recommendation for the whole microbes,
16 products of microbes, on that hotly debated
17 topic. So that is what we will be looking at.

18 Let me get back to one really
19 important concept that I skipped in my little
20 notes here. I talked about source and
21 process. We have historically treated this
22 idea of agricultural non-ag and synthetic

1 nonsynthetic as two separate unrelated
2 questions.

3 Because we believe source and
4 process both contribute, the joint committee
5 generally agrees that these need to be --
6 these can't be handled as separate and
7 distinct questions. They need to be handled
8 linearly. And we think the synthetic-
9 nonsynthetic needs to come first, and then the
10 ag/non-ag. So if you get to an agricultural
11 product that gets crazily processed in some
12 way that I'm not going to get into the
13 details, it becomes synthetic, and it may
14 still have been sourced agriculturally, but at
15 this point it is a synthetic.

16 But then from your nonsynthetic
17 materials to pull out those that are ag and
18 those that are a mineral or things like that.
19 And the public comment we received generally
20 supported that idea that those needed to be
21 handled in a linear fashion.

22 So the decision tree will -- that

1 we will be working on will have those listed
2 that way.

3 So any questions or comments from
4 the Board? Things you want us to consider?

5 CHAIR MOYER: Katrina, I'll just
6 say that for once the Board put itself in a
7 position where we can't make a mistake. That
8 is wonderful. Nicely done to that Joint
9 Committee. We've worn the public down, so
10 they will just take anything that we give
11 them.

12 (Laughter)

13 MEMBER HEINZE: That wasn't our
14 intent.

15 CHAIR MOYER: It was not.

16 MEMBER SMILLIE: This continues
17 as a joint materials and handling committee
18 task, correct?

19 MEMBER HEINZE: I believe so,
20 yes.

21 CHAIR MOYER: That is correct,
22 Joe.

1 MEMBER HEINZE: You want to make
2 sure your voice is heard.

3 MEMBER SMILLIE: You got that
4 right.

5 MEMBER HEINZE: Other comments,
6 questions?

7 CHAIR MOYER: Bea.

8 MEMBER JAMES: One of the things
9 that you mentioned, Katrina, was that some
10 members of the Board and some commenters feel
11 like it's such a small minutiae amount, why
12 should it matter. I guess just for the record
13 I want to put it out there and say that there
14 is no small percentage in the eye of the
15 consumer, especially as we carve the path
16 forward. And I think that we have to at this
17 juncture be very careful and make sure that we
18 take that into consideration. Thank you.

19 CHAIR MOYER: Julie?

20 SECRETARY WEISMAN: Yes, I was
21 going to go back to something specific, that
22 I just want to make sure that I understood.

1 In your discussion about microbes
2 and the products of microbial fermentation,
3 which I do agree with you that the whole issue
4 of microorganisms has been a big divide across
5 which various of us here and there have been
6 standing.

7 But products of microbial
8 fermentation, I'm not remembering that
9 discussion. Because I mean for instance
10 organic wine, organic alcohol, are all
11 products of microbial fermentation, and I
12 don't believe that those have been under
13 question by anybody on this board. So I just
14 wanted that to be for the record, that we are
15 not talking about those types of -- yes?

16 MEMBER HEINZE: You know when we
17 wrote this document those weren't the products
18 that we had in mind. We had things like
19 citric acid and there are some others that
20 aren't coming to me, you guys know I always
21 have these critical moment memory faults. But
22 citric acid, there are five or six others. Is

1 gelling gum one of them as well? I think that
2 is my favorite. Someone out there can nod at
3 me.

4 But there is a number of materials
5 on the list that are products of fermentation.
6 It wasn't beer, wine and cheese, those guys.
7 And we just didn't consider that in our
8 document. So that is something that will have
9 to be pulled out when we do this.

10 CHAIR MOYER: Dan.

11 MEMBER GIACOMINI: We did have
12 one conversation though where in reviewing the
13 document we were asking the question what is
14 the difference in beer as a result of
15 fermentation being organic, and citric acid if
16 it comes from an organic source being the
17 result of a fermentation, being nonsynthetic.
18 So we did have those conversations.

19 By no means are we looking to say
20 that beer and wine and those things are not,
21 but there has to be a justification for
22 drawing the line. It can't just be, because

1 that's where I want to draw it. The
2 discussion as it went into this document I
3 think was more to figure out the way that we -
4 - if we are going to draw a line we need a
5 justification for it, and we just can't just
6 make it up.

7 A couple of other things, and I'll
8 try to be as brief as I can. But it's -- I'm
9 always interested when I come to these
10 meetings and it's not exactly something for
11 this document, but it was certainly brought up
12 in your discussion and we hear it every time
13 I come. And I'm not from the certifier area
14 of the world. But I always find it intriguing
15 that almost every certifier comes up and has
16 at some point in time they will tell us
17 something that justifies how they are
18 different than other certifiers. They either
19 have more animal welfare issues in their
20 procedure, or they have more bio-security
21 issues in their procedures, or more
22 biodiversity issues in their procedures.

1 But the minute anyone looks at
2 those things and uses them to decide between
3 certifiers, I start hearing all the screaming
4 about shopping around.

5 And it's just an interesting
6 dichotomy that someone who is not from the
7 certifier realm that I hear at these meetings.

8 I think that is it.

9 CHAIR MOYER: Hue.

10 MEMBER KARREMAN: Just back on, I
11 let you guys do all the committee work on that
12 stuff. Like you don't talk about livestock
13 too much.

14 But one thing, as far as the beer
15 and cheese and all that, can't you just say
16 products that are made -- traditionally
17 longstanding products made from fermentation
18 are different than citric acid? Just a
19 suggestion. Maybe you already thought of that
20 a long time ago.

21 MEMBER HEINZE: Well, I
22 appreciate the suggestion, because we didn't

1 think about it that much.

2 You know it was so clear to us
3 that beer wasn't what we were worried about
4 that we didn't even address it in our
5 document. So I appreciate the suggestion.

6 CHAIR MOYER: Any other folks
7 with questions or comments for katrina?

8 Thank you, Katrina.

9 MEMBER HEINZE: Well, we still
10 have the material working group. So I think
11 that is Kim and Gwendolyn, right? So while
12 they make their way here, I will publicly tell
13 you guys, these two folks did an amazing job
14 wrangling, I think, at some times the calls
15 had maybe 25-30 people on them, all with great
16 opinions and active, the most active email
17 debate I've been involved in in a long time;
18 anyone who was on their email list would get
19 to work on Monday morning if you hadn't turned
20 on your computer and be flooded, literally.
21 I think one morning I had 63 emails on
22 material working group on a Monday morning,

1 which is not a good way to start the week.

2 But Gwendolyn and Kim really
3 should be commended for their efforts. I did
4 tease them. I recently changed jobs, and as
5 a reward was presented a bottle of wine with
6 the brand, Herding Cats. And I thought maybe
7 you two deserved a bottle of that as well.

8 I'll bring it to the next meeting.
9 I haven't opened it yet.

10 CHAIR MOYER: Kim, I'm not sure
11 that microphone is turned on. Would you check
12 that please?

13 MS. DIETZ: Okay, with that we'll
14 go ahead and get started. We are going to try
15 as much as we can into 15 minutes. So just
16 from a logistic standpoint I'll open it up.
17 Gwendolyn is going to go through definitions,
18 current definitions, and then some proposed
19 definitions. And then we are going to ask Zia
20 and Emily to come up, and they are going to
21 take you through some decision trees, the fun
22 part, and we will actually have a couple of

1 examples of materials to help walk you through
2 so you get to really see what is going on with
3 it.

4 So as we have all been talking
5 about these last couple of meetings, we
6 started this group in 2007 really with the
7 purpose to bring to you the historical
8 perspective, of the work of the past boards,
9 as well as the industry perspective.

10 We participated a lot, as Katrina
11 has said, and yes, it was like herding cats.
12 Sometimes Gwendolyn and I would get on the
13 calls, and I'd say, okay, you call them, and
14 I'll call them. And I guess that is my HR
15 background, because you have to really love
16 what you do, and the people have passion. And
17 as long as they have passion, it's all worth
18 it. So I'm proud of the work that we've done.
19 So let's go ahead and see the next slide,
20 please.

21 As you can see we have a very
22 large group of participants. And from the

1 ag/non-ag to the synthetic documents we added
2 about 30 percent of the number of people onto
3 our calls. Not all of these people
4 participated, but they all certainly got the
5 emails. Whether that is good or bad, if you
6 weren't on the calls you didn't necessarily
7 understand exactly what was going on. But the
8 dynamics were there, and everybody on that
9 list is very highly skilled in their specific
10 areas. So I want to thank them, and also
11 thank the OTI again for sponsoring our weekly
12 conference calls.

13 So with that, the background
14 papers that we have used, we really went back
15 to the 2005 documents that you see up there.
16 We used the NOSB guidance document on the
17 definition of synthetic, from 2005, as
18 background. We were asked really in
19 collaboration with the board to focus on the
20 NOP evaluation from March, 2006, specifically
21 the questions that the NOP had asked us. So
22 that is really the framework for the

1 recommendation that we gave to you.

2 We looked at and used the March 9,
3 2006 document as well, and then we just
4 analyzed all of those together, and gave to
5 you our proposals.

6 So the main focus, though, really
7 was looking at that 2006 document and going
8 forward from there. There has been 20 years
9 of work done on these topics, but we all
10 agree, we are almost there, folks, so let's
11 keep working with it.

12 So with that I'll turn it over to
13 Gwendolyn, and she will go through the
14 definitions, and then we will take you through
15 the decision tree.

16 MS. WYARD: Okay, thanks Kim. I
17 get the fun stuff.

18 All right, so if you have the
19 paper in front of you, what I might suggest is
20 keeping the definition of synthetic just right
21 out in front of you the entire time.

22 Because as Kim mentioned, all of

1 the definitions that we are going to present
2 to you, I think we have only included one.
3 All of the definitions were -- they started
4 out as part of the NOSB recommendation. And
5 then there were new proposed definitions that
6 came from the NOP, specifically the NOSB
7 recommendation was analyzed by the AMS science
8 division.

9 So all we've done is further
10 refine the proposed definitions that were in
11 the March 9th, 2006 document. So I just want
12 to be really clear that we haven't made up
13 these definitions, but we have refined them.

14 And what I'm also going to try to
15 do is provide some commentary that is not
16 necessarily in the discussion document, some
17 commentary that will speak to the progression
18 that occurred, going from the NOSB guidance
19 document of 2005, to the NOP document of 2006,
20 to the discussion document that was submitted
21 to you.

22 Up on the screen we have relevant

1 existing definitions, certainly synthetic,
2 which is the definition that we are going to
3 be working with. All of the proposed
4 definitions are terms that are within the
5 definition of synthetic. So we have recognize
6 that, in trying to apply the definition of
7 synthetic in making decisions about what
8 materials should or should not go on the
9 national list, there have been problems in
10 trying to apply different phrases within the
11 definition of synthetic. So we are really
12 parsing out the definition of synthetic,
13 breaking it apart, taking each phrase and
14 defining those phrases.

15 Non-synthetic certainly is
16 relevant, and then -- next slide, please --
17 the definition of processing. This definition
18 is going to come up when we are talking about
19 formulation and manufacture.

20 So we are starting with natural
21 source. This definition was not used.
22 Natural source is not used in the definition

1 of synthetic. However it was suggested by the
2 AMS, because the term, natural source, was
3 used in their definition they came up with of
4 extraction.

5 Now we refined the definition of
6 extraction such that we have removed that
7 term, natural source. However it is still
8 important to us, because one of the questions
9 that the AMS asked the NOSB to consider is
10 whether microbiological or fungal material
11 would be considered natural.

12 So the definition of non-synthetic
13 refers to mineral, plant or animal matter. So
14 what we have done in the definition of natural
15 source - now the AMS definition said mineral,
16 plant or animal matter -- we have taken plant,
17 animal, microbiologic and fungal and we have
18 wrapped that altogether into the phrase,
19 biological matter.

20 So naturally occurring mineral or
21 biological matter used to obtain non-synthetic
22 inputs for organic production or handling. So

1 really the creation of this term, natural
2 source, is to help further clarify that which
3 is non-synthetic.

4 So we are going to go in the order
5 of easiest to most difficult. So that one
6 should be pretty straightforward.

7 Now moving on to extraction, this
8 is a big topic. The AMS document took the
9 NOSB recommendation on the meaning of
10 extraction and they broke it down into its
11 various concepts and conditions. The NOSB
12 document had a long paragraph that described
13 what extraction meant as well as various
14 conditions that would result in a non-
15 synthetic substance.

16 So the AMS document came up with
17 the term, extraction, and then went on to list
18 out the specific conditions.

19 So we are suggesting that the verb
20 form, going from extraction to extract, is
21 more helpful when you are trying to clarify
22 the distinction between extraction and

1 chemical change. So we are letting extract
2 stand more on its own.

3 There is -- to separate, withdraw,
4 or obtain one or more essential constituents
5 of an organism, substance or mixture, by use
6 of solvents or mechanical or physical methods.
7 So you can extract, and then once that
8 extraction has occurred, you look at that
9 extraction process and decide whether a
10 chemical change has occurred.

11 So here we have the conditions.
12 I'm just going to go ahead and read down
13 through them. These are going to be
14 definitely an area for everybody to focus on
15 and comment on.

16 An extracted substance is non-
17 synthetic if it's extracted from a natural
18 source. That is square one; first and most
19 important question. It has to come from a
20 natural source.

21 We have added the condition, it is
22 present in the same form in the natural

1 source. It is not chemically changed into a
2 different substance during extraction. It
3 comes from a natural source, has a chemical
4 change occurred.

5 And also the process of extraction
6 does not alter the substance into a chemical
7 form that does not occur in nature.

8 Important functional properties of
9 the substance are not altered by extraction.

10 And finally, it's not contaminated
11 with a significant level of synthetic
12 substance that is not on the national list.

13 Now this last part, so significant
14 level in this context, and this was, again,
15 this was what was set forth both with the NOSB
16 and the AMS document that a significant level
17 is the amount capable of producing the
18 functional or technical effect.

19 So this -- any significant levels
20 then of the solvent, let's say, that was used,
21 the chemical that was used to extract -- well,
22 let me back up first and say that -- and this

1 is really an important point here, because
2 this comes up in discussion, and we are going
3 to talk about this. You are going to be
4 talking about this with respect to lecithin,
5 but this has been the historical thought, is
6 that the chemicals that are used in the
7 extraction process do not necessarily have to
8 be non-synthetic.

9 So, you can use a synthetic
10 chemical to extract a substance, and that is
11 okay so long as the substance is not
12 chemically changed.

13 Now we are going to revisit that
14 concept when we are talking about handling
15 materials versus crop and livestock. This
16 definitely applies to crop and livestock
17 materials. We are going to look at where
18 there may be an exception with handling
19 materials based on a portion of the handling
20 regulations.

21 What we've also added here with
22 respect to insignificant levels is that it may

1 be problematic trying to focus on what a
2 technical or functional effect is.

3 Some examples, you can take
4 aquatic plant extracts and humic acid
5 derivatives. Those are on the national list
6 as synthetic, because they have large amounts
7 of potassium left in them and they have a
8 technical or functional effect, versus let's
9 say hexane, that may be used in the extraction
10 process but it doesn't remain in the product;
11 it doesn't have a technical or functional
12 effect.

13 There may be other areas that need
14 to be considered, specifically, looking at the
15 applicable regulatory limits that might be set
16 for a particular livestock material or crop
17 material. Maybe FDA or AFCD will set certain
18 contaminants levels. So that is an additional
19 consideration that we are suggesting needs to
20 be looked at.

21 Okay. Formulation and
22 manufacturing. If you look at the definition

1 of synthetic, it says a substance that is
2 formulated or manufactured. So in the NOSB
3 recommendation they said that once a substance
4 is extracted, if it then undergoes a chemical
5 reaction as it's processed, formulated or
6 manufactured, it would be considered
7 synthetic.

8 They also said that formulation or
9 manufacturing, formulation or manufacturing,
10 is not intended to address the processing of
11 an agricultural product by a certified
12 handling operation.

13 So they have got formulation,
14 manufacturing and processing. And the AMS
15 science division said, let's break this down
16 further. Let's distinguish formulation as a
17 process separate from extraction and
18 processing. Let's provide a definition for
19 formulation. And let's explain the
20 relationship between formulation and
21 synthetic.

22 The definition that they proposed,

1 they decided that formulation and
2 manufacturing, it would be more clear to view
3 them as synonyms. So they have come up with
4 this definition that talks about the
5 manufacturing of an agricultural or handling
6 input that is derived from a substance,
7 extracted from a natural source or produced by
8 a naturally occurring biological process.

9 They really just went for the
10 gusto here. They tried to wrap almost all the
11 requirements that you might consider for what
12 would be non-synthetic into this general
13 definition of formulation used synonymously
14 with manufacturing.

15 And we're saying let's break this
16 apart even further. Let's use the verb form
17 of manufacture. Let's view manufacture and
18 formulate as two separate things for lack of
19 a better word.

20 To manufacture is to make a crop,
21 livestock or handling input from raw
22 materials. That is the creation of a

1 substance. Where to formulate is combining
2 different materials according to a recipe or
3 formula to prepare the product being
4 evaluated.

5 We see those as being two separate
6 things, both of which need to be evaluated,
7 separately.

8 And then here is the definition
9 that we have added, another new proposed
10 definition is to further define the term,
11 generic, since we do use it in, I think in the
12 next slide you will see it come up. So that
13 definition is the common and familiar non-
14 proprietary name, of a substance.

15 Next slide. I think I have jumped
16 ahead here, so we are going to be able to save
17 some time, and go on with the next slide.

18 Okay, so some more discussion on
19 the term, formulate. Formulate generic
20 substances such as enzymes. Flavors are
21 examples of formulated products that must be
22 reviewed for inclusion on the national list.

1 So much like extraction we have
2 set up conditions for formulated products. So
3 it's a non-synthetic formulated product,
4 contains only non-synthetic substances.

5 And the process of formulation
6 doesn't transform a component into a
7 difference substance via chemical change, with
8 the exception of substances formed via
9 naturally occurring biological process. That
10 is always the exception for synthetic.
11 Chemical change occurs, that's synthetic
12 except if that chemical change is a result of
13 a naturally occurring biological process.

14 And then finally the process of
15 formulation results in the retention of
16 important functional properties of active
17 ingredients.

18 Okay so, manufacture, formally
19 manufacturing, here is where the term, generic
20 input, is used. Formulation is the combining
21 of substances to produce a generic input.

22 This next part, manufacturing in

1 this context is not intended to address the
2 processing of an agricultural product by
3 handling operation for human or animal
4 consumption.

5 So it's really important to stress
6 that when evaluating substances, manufacturing
7 applies to non-organic inputs used in crop
8 handling or livestock operations. Once you
9 are talking about a certified handling
10 operation that is making a food product or an
11 agricultural product, it was processed. So if
12 it undergoes a chemical change it is not
13 considered synthetic, but rather a processed
14 product.

15 Substance is not defined by OFPA
16 or in the NOP rule, but it is used in the
17 definition of synthetic and non-synthetic. It
18 is used in the new proposed definition. It is
19 used in the regulation. And it is used
20 throughout our paper.

21 The NOSB defined substance in
22 their 2005 recommendation, and the AMS found

1 it to be scientifically sound. Namely, it
2 allows for minor variations in the atomic
3 composition or molecular weight of complex
4 bio-molecules.

5 So really the point here is that
6 the definition of substance, what it is
7 recognizing is that substances don't
8 necessarily have a uniform or static atomic,
9 molecular composition. Therefore the
10 substances are distinguished one from another
11 based on identities. And there are identities
12 that are assigned by the independent naming or
13 regulatory bodies, such as the Chemical
14 Abstract Society, CAS numbers.

15 And such identities may be based
16 on chemical, technical or functional
17 properties. And this distinction is important
18 as it relates to the definition of chemical
19 change.

20 Naturally occurring biological
21 process -- this is another one NOSB defined in
22 their documents. AMS found it to be

1 scientifically sound. Their only suggestion
2 is that if you separate it out from the policy
3 stating that substances created this way be
4 considered non-synthetic. So just to be
5 really clear that this is a non-synthetic
6 source, non-synthetic process.

7 MEMBER HEINZE: We want to make
8 sure we have time to see some things go
9 through the decision tree.

10 MS. WYARD: Oh, I'm just getting
11 started.

12 MEMBER HEINZE: I know. So maybe
13 if you could skim the rest of the definition
14 so we could have five minutes for -- I know we
15 are getting close. Just a time check.

16 MS. WYARD: That's perfect then.
17 I'll just say then for chemical change
18 probably the best thing with chemical change,
19 Rather than trying to drill down at all, this
20 was the area that troubled us the most. I'm
21 pretty sure that we all went through a
22 chemical change.

1 We formed the chemical change
2 committee. Undoubtedly many of us were
3 rendered synthetic. So this -- I'll just say
4 that this is one you are really going to need
5 to focus on. This has always been a problem
6 area, and we have provided plenty of
7 commentary and description in our paper. So
8 next slide.

9 So finally in closing there were
10 additional concerns, one has come up, this is
11 205.270(c)(2). This is where the split occurs
12 from solvents that -- chemicals that might be
13 used in the extraction of a crop or a
14 livestock material, where historical thinking
15 is that's fine so long as there is not a
16 chemical change.

17 But that section of the regulation
18 prohibits the use of volatile synthetic
19 solvents in synthetic processing aids. But it
20 is unclear exactly who that applies to,
21 whether it applies to the certified handler or
22 to the manufacturer of the non-organic

1 ingredient. It's very ambiguous, but very
2 very important figuring out in terms of how
3 you apply that then to the evaluation of
4 synthetic and non-synthetic materials for
5 handling operations.

6 Chemical change, there was some
7 comments yesterday. George, you know, there
8 were some members that had a very different
9 way of thinking about the definition of
10 synthetic, completely redefining it, going
11 into OFPA, making constructive changes there.
12 That was -- came up. We decided not to focus
13 on that since our focus was on the 2006 paper.
14 And that's a wrap on additional concerns
15 there.

16 So what I will do is exit stage
17 left, and call up Emily and Zea. They are
18 going to work some examples through the
19 decision tree if there is time for that.

20 We are going to look at citric
21 acid and we are going to look at soy protein
22 isolate using the decision tree that was put

1 together, using all of these new proposed
2 definitions that I presented here today.

3 Thank you very much.

4 MEMBER HEINZE: Thank you,
5 Gwendolyn. And just a time check. As you
6 guys know, we went into this an hour behind,
7 and we are trying to gain time.

8 So if you could just point --
9 focus on areas of maybe disagreement, and we
10 will give about five minutes for the whole
11 discussion.

12 Thanks.

13 MS. SONNABEND: Zea Sonnabend,
14 member of the materials working group.

15 I'm giving the example of citric
16 acid. And I hope you can all see the steps in
17 the decision tree up there.

18 This morning it came up in one of
19 your discussions of alternatives to the
20 petition. Where is citric acid really from?
21 How is it made? We are going to look at that
22 right now.

1 I happened to be here 14 years
2 ago, and shepherded the initial TAP review of
3 citric acid, and had this discussion with the
4 NOSB 14 years ago along with several original
5 members.

6 So it seemed appropriate that we
7 go through it again.

8 Citric acid is used in many uses
9 in organic crops and handling. Acidulant
10 buffer, chelating agent, pH adjuster, foam
11 inhibitor, sequestering agent, mordant, anti-
12 coagulant.

13 The first question on our decision
14 tree: is the substance manufactured, created,
15 or extracted from a natural source?

16 And in your handouts we've
17 underlined those terms that are defined in our
18 previous definitions, so you can look back to
19 those definitions.

20 So the answer to this is yes. The
21 organism that is the source of citric acid is
22 aspergillus niger. It has been grown on a

1 media that consists mostly of molasses and
2 sugars. While the fermentation media contains
3 some synthetic substances, these are either
4 metabolized or removed by the extraction
5 process.

6 Question two on the decision tree:

7 does the substance undergo a chemical change?

8 Well, the answer is yes for the end result,
9 but along the way -- I mean the answer is yes
10 in the process, but the end result, the end
11 product, is not chemically changed from the
12 starting material.

13 Explain: calcium hydroxide is
14 added to the fermented carbohydrate media.
15 Calcium citrate precipitates out and then
16 sulfuric acid is used to remove the calcium as
17 insoluble calcium sulfate and pure citric
18 acid. The substance is therefore precipitated
19 as a salt; ends up back as the same acid in
20 which it began.

21 One of the controversial areas
22 that we did not fully resolve in our

1 discussion is whether this so-called
2 displacement reaction where a salt comes in
3 and precipitates out being displaced, one ion
4 displaces the other; and whether in all
5 circumstances that results in a chemically
6 changed material. Some of us say no; some of
7 us say yes; and that might need a little bit
8 of further work.

9 But for the purposes of this, what
10 this particular material, what the NOSB then
11 went on to say before is to go to question
12 three. Is the substance produced by a
13 naturally occurring biological process? And
14 the answer is yes, aspergillus niger is the
15 naturally occurring biological process. If
16 you look back in your definition of synthetic,
17 it says except for those things produced by
18 naturally occurring biological process.

19 So therefore we proceed to step
20 four: has it been formulated further to
21 produce an additional generic substance? And
22 the answer is no.

1 So the conclusion is that citric
2 acid is non-synthetic because it is part of
3 the exception for naturally occurred
4 biological processes that created the material
5 in the first place, even though some steps
6 that create chemical change have occurred
7 along the way of its extraction and
8 processing.

9 MEMBER HEINZE: Thank you. Are
10 there any questions for Zea? Comments?

11 Do folks understand how their
12 proposed decision tree applied in that case?

13 Thank you, Zea.

14 Emily.

15 MS. BROWN-ROSEN: Hi, I'm Emily
16 Brown-Rosen from Pennsylvania Certified
17 Organic.

18 Okay, so the example they threw in
19 my lap is this one that's been kicking around
20 for along time called soy protein isolate.

21 So if you look on your -- we gave
22 the Board a handout on this, on the back page,

1 I pulled out a little description of the
2 manufacturing process that I dug out of some
3 old supplements to supplements of TAP reviews;
4 I think there were three various technical
5 reports on this in 2003 and 4.

6 So and I wanted to do that to
7 illustrate one point, too, is that when you
8 are going through a decision tree it is really
9 really important that you have a good clear
10 understanding of the manufacturing process.
11 I mean, the more information you have the
12 better you can answer these questions, and it
13 all depends on information, how you answer
14 those questions. So that is really worth
15 getting at and working with the contractors I
16 think to get really good manufacturing
17 process.

18 Okay so in this case question
19 number one -- well, back up a second, and say
20 this was petitioned as a fertilizer soil
21 amendment. It's a derivative of soybeans used
22 as like a nitrogen supplement fertilizer.

1 Although it also does have a lot of food
2 additive uses as well, but it was not
3 petitioned for that.

4 Is the substance manufactured,
5 created or extracted from a natural source?

6 And the answer to number one would be yes. We
7 start out with soybeans; that's pretty
8 natural. Pretty obvious.

9 Number two, does the substance
10 undergo a chemical change? The answer here is
11 yes, and the explanation is that they take the
12 defatted soybeans, which are hexane extracted,
13 pressed, soybean flakes -- this is done like
14 in big conventional soybean plants. They use
15 alkalide acid hydrolysis. There is an
16 alternate method that uses something called
17 poly isopoprylacrylamide gel to do the
18 separation.

19 But this, the most common is this
20 hydrolysis process, and that is described as
21 hydrolysis of soybeans by a strong base sodium
22 hydroxide, and then a strong acid,

1 hydrochloric acid, which denatures and changes
2 the chemical properties of the protein in the
3 soybean meal.

4 The proteins are rendered more
5 water soluble by these different stages of
6 chemical processing. In the case of the
7 polyacrylamide gel, that also changes the
8 chemical properties, and I think the
9 solubility of the soy protein.

10 Another reason to consider that
11 there was a change is that soybean meal has
12 one CAS number and soy protein isolate has a
13 different CAS number suggesting that they are
14 considered two different chemical compounds,
15 they have different functional properties.

16 So in this case the answer to the
17 question, yes, it says proceed to question
18 number three. Then the next question, did
19 this chemical change, was it caused by a
20 naturally occurring biological process? No,
21 in this case it was a direct chemical process,
22 so the answer is no, and that's where you

1 would stop and say this substance is in fact
2 synthetic. So that one is fairly
3 straightforward.

4 Any questions?

5 MEMBER HEINZE: Thank you. Any
6 questions for Emily? Do you folks get how
7 that went through the decision tree that has
8 been proposed?

9 Okay, well thank you. Is that it
10 for you guys? Great, well, thank you very
11 much. I appreciate all the hard work and all
12 the education.

13 CHAIR MOYER: And the Board
14 thanks the materials working group a great
15 deal. Thank you very much.

16 Katrina, does that conclude your
17 presentation?

18 (Applause)

19 MEMBER HEINZE: Hey, you all are
20 clapping because you are glad it's over.
21 Thank you, everyone.

22 We are done, Jeff.

1 CHAIR MOYER: Thank you, thank
2 you very much.

3 Moving on to the next topic in
4 front of the Board, the Materials Committee,
5 Dan Giacomini, chairman.

6 Dan.

7 MATERIALS COMMITTEE

8 MEMBER GIACOMINI: Thank you,
9 Mr. Chairman.

10 The materials committee was
11 cruising along between the last meeting and
12 this, and the issue of nanotechnology, its use
13 in all various forms and products, started
14 becoming more and more obvious, and with just
15 a little bit of investigating we went from,
16 boy, maybe we ought to start looking at this
17 before the horse is too far out of the barn,
18 to, wow, the horse is already out of the barn.

19 So it became -- it moved up on our
20 work plan significantly. But we felt that it
21 was something that we definitely needed to at
22 least start discussion on with the organic

1 community.

2 The background, this is a
3 discussion document. And within it we asked
4 a number of specific questions which I won't
5 go into each one, itemizing each one at this
6 time. But we did have fairly uniform
7 agreement with the comments that were
8 presented that nanotechnology is not
9 compatible with organic principles and the
10 organic industry.

11 What there was not clear agreement
12 on is what is the definition, and where should
13 that line be drawn of what is nanotechnology.
14 There is the issue of the nano-sized
15 particles, the use that it -- what it is used
16 for, and whether there is a change in original
17 use. And there may be other things that come
18 up as this industry continues to develop.

19 The -- so we had a fairly good
20 agreement, I think, with the comments that we
21 had that we need to consider looking at this,
22 and trying to figure out a way to best define

1 or to find the agency that is far smarter than
2 us that has done the best job at defining
3 nanotechnology for our purposes.

4 We certainly are not experts in
5 this field by any means, and we are relying on
6 all the expert help that we can. We did a
7 tremendous amount of work in searching things
8 through from some of the national initiatives
9 on the Internet, and we had tremendous support
10 and help from OTA on some of their background
11 information that they worked on through their
12 nanotechnology task force.

13 The one thing that I will address
14 based on comment is that we had a number of
15 public comments that felt that nanotechnology
16 should be included now under excluded methods,
17 and that it is already covered. While that
18 may have some intuitive logic to it, when you
19 actually look at the definition of excluded
20 methods, it's fairly exclusive to dealing in
21 genetic and cellular terms. And oftentimes
22 when we are dealing with things like nano-

1 silver and other products along those lines,
2 it's -- right now it does not appear that the
3 definition we have for excluded methods
4 includes those compounds.

5 So, Mr. Chairman, it's a
6 fascinating topic. We do have the discussion
7 document, but I think in the essence of time
8 I will go to any questions you may have,
9 questions or comments.

10 CHAIR MOYER: Thank you, Dan.
11 Julie.

12 SECRETARY WEISMAN: I think I
13 certainly have -- we got a lot of written
14 public comment, some written public comment
15 about the nanotechnology, and we certainly
16 heard quite a bit said yesterday during oral
17 public comments. And most of that rightly
18 points out that there is a lot that is not
19 known about the results of the kinds of
20 particles that could be created by
21 nanotechnology.

22 However, I think the reason why

1 this -- we did not consider this to be a no-
2 brainer is because it is also the case that
3 some very traditional longstanding methods
4 have been in use that do fall under the
5 current definition of nanotechnology, and I'm
6 thinking about homogenizing milk.

7 So I guess I just want to
8 emphasize that parts of nanotechnology I think
9 are no-brainers in terms of deserving very
10 very close scrutiny. But to me it's not the
11 same kind of no-brainer as cloning was, for
12 instance, when we made our statement about
13 that.

14 So I just want to caution everyone
15 that we have to be really mindful that there
16 are technologies that have been around since -
17 - there are practices that have been around
18 since before the idea of nanotechnology was
19 even dreamed of, and we don't want to do
20 anything -- we want to be very careful about
21 what -- not throwing out babies with
22 bathwater.

1 MEMBER GIACOMINI: I'll agree
2 with you to a certain extent, Julie, but I
3 think your comment gets to the essence of the
4 problem in the definition. One of the more
5 predominant definitions that we list in the
6 document has three points to it, and it says,
7 in their definition -- within the definition
8 they say that it needs to meet all three
9 points to be nanotechnology, and that is the
10 small particle size of between one and 100
11 nanometers in size, creating or using
12 structures, devices, and systems that have
13 novel properties and functions, because of the
14 small or intermediate size; and the ability to
15 control or manipulate on the atomic scale.

16 I think the example you gave, for
17 instance, with the homogenizing of milk, fits
18 number one. There are particles of that size
19 created. But I'm -- I would question whether
20 they meet number two and three. And if they
21 have to meet all three, then they would --
22 yes, it's nanoparticle size, but it's not

1 nanotechnology. And that is all part of the
2 problem in trying to figure out what is the
3 definition and where do we draw the line.

4 And there are many other ones.

5 There are products you can find in the
6 marketplace. There is a product I found on
7 the Internet that described itself as a
8 nanotechnology ice cream. They make their ice
9 cream and they deep freeze it in liquid
10 nitrogen to create smaller crystal particles.

11 They are creating nanotechnology
12 size, but even if we question some of the
13 other things, are we -- would we want to not
14 allow liquid nitrogen freezing in the organic
15 industry that would -- that would take some
16 discussion.

17 There was another soil or plant
18 crop additive -- I don't remember whether it
19 was soil or plant -- that used homeopathic
20 concentrations in the water -- in the
21 irrigation supply. They describe themselves
22 as nanotechnology, but then they talk about it

1 as homeopathic. They didn't really say
2 whether they were nanotechnology because they
3 were homeopathic, or they were nanotechnology
4 because of what they did to the particle
5 before they went through the homeopathic
6 dilutions.

7 So it's used -- the term is used
8 as much in marketing as it is in reality and
9 science, and it's sometimes using right now,
10 it's being used to sell as much as it is to
11 truly explain. So that is another part of the
12 problem.

13 Anything else? If there is no
14 more, Mr. Chairman, back to you.

15 MEMBER SMILLIE: Joe, what is
16 your plan for this document?

17 MEMBER GIACOMINI: We will try to
18 keep this document as high on the priority
19 list as we possibly can, but it is definitely
20 going to be secondary to the definition and
21 classification of materials. We would like to
22 say that we could get a recommendation for the

1 fall, but it will -- we will not -- we won't
2 allow it to displace timeframe on the other.
3 The other is, we are not saying this is small,
4 but that one is longer.

5 CHAIR MOYER: Any other questions
6 or comments for Dan?

7 There being none, I think we are
8 in need of a brief break. We will take 15
9 minutes. Be back here please at 3:15, Board
10 members, ready to take your seats.

11 (Whereupon at 3:00 p.m. the
12 proceedings in the above-entitled
13 matter went off the record to
14 return on the record at 3:18 p.m.)

15 CHAIR MOYER: Okay, we have a
16 quorum. We are going to get started.

17 Our meeting is back in session,
18 and we will get started with our next order of
19 business before this board which would be the
20 handling committee report, Steve DeMuri,
21 chairperson.

22 Steve, if you're ready, the floor

1 is yours.

2 HANDLING COMMITTEE

3 MEMBER DeMURI: I am ready, thank
4 you, Mr. Chairman.

5 Well, it's been a very busy six
6 months on the Handling Committee. We've got
7 a number petitioned items we are going to
8 discuss today.

9 And first of all I'd like to thank
10 the other members of the committee for all
11 their hard work over the last six months.
12 We've had a lot of meetings, done a lot of
13 document reading, a lot of public comment
14 review. And it's been very invigorating and
15 a little bit tiring.

16 I especially want to thank Julie
17 who in addition to being the Board secretary
18 and member, I think, of every other committee,
19 she has also helped to push me out of the nest
20 as the Handling Committee chairman. So thank
21 you very much, Julie, I appreciate that.

22 This is somewhat of a historic

1 meeting for this Committee and the Board
2 actually because we are considering petitions
3 to actually remove items from the national
4 list. So I think we do -- we know that we
5 need to be fairly quick here because we are
6 late, but we want to make sure that we give
7 everybody enough time to ask questions on
8 these important items. So we will try to be
9 as expeditious as possible here.

10 We do have nine different
11 petitions that we are reviewing today. For
12 605(b) we have proprionic acid, sodium
13 chlorite acidified, propane, and bleached
14 lecithin for removal.

15 For 606 we have chicory root, red
16 corn color, myrrh essential oil, wheat germ,
17 all to add; and lecithin fluid, unbleached, to
18 remove.

19 We did divvy these up as a
20 committee, and we will go in order of the
21 agenda items, and each committee member that
22 was responsible for doing the bulk of the work

1 on each item will present those to you.

2 The first one is proprionic acid,
3 and that happened to be mine. This petition
4 was very similar to the petition you heard
5 about for the livestock committee. It was
6 petitioned as a mold inhibitor in feeds and
7 grains, almost exactly the same as the
8 petition to livestock. The petition is for
9 the synthetic form of proprionic acid; I want
10 to make that very clear, that there are
11 natural forms available. This petition is for
12 the synthetic form only, so that is a very
13 important distinction.

14 As I mentioned, there are natural
15 forms available.

16 The few public comments that we
17 received on this item seemed to agree with the
18 committee recommendation. And our
19 recommendation was to not list, and that was
20 a vote that was four no, one absent, one
21 recusal.

22 I think that is all I need to say

1 about this, because you've heard a lot about
2 the particular substance with the livestock
3 report. So any questions at this point on
4 proprionic acid?

5 No? Okay. The next item we have
6 on the agenda is sodium chlorite, acidified,
7 and I will pass the mike on to Katrina.

8 MEMBER HEINZE: Thanks. Okay,
9 sodium chlorite, acidified, has been
10 petitioned for addition to 605(b). I'm going
11 to give a brief background of what it is, how
12 it's used, it's regulatory approval and then
13 some of the conversation that we had as a
14 committee as we evaluated this, and then
15 review some of the public comments.

16 And it is our recommendation to
17 list this material.

18 So sodium chlorite, acidified, is
19 used for direct food contact and indirect food
20 contact surface sanitation. It is solutions
21 that are made onsite, and on demand, by mixing
22 a solution of sodium chlorite with natural

1 citric acid. So the users of this would have
2 two tanks onsite. One would have about 25
3 percent sodium chlorite, and the other would
4 have about 50 percent citric acid. When they
5 are ready to use it, they are pumped together
6 with a water dilution, and then used at the
7 point of use.

8 As you heard yesterday in public
9 comment, the solution breaks down to citric
10 acid, water, and common table salt. And that
11 is one of its advantages over similar
12 materials that are already on the list, that
13 it's breakdown materials are, frankly, pretty
14 benign.

15 It has regulatory approval very
16 widely, by FDA, USDA's food, safety and
17 inspection service, EPA, and multiple other
18 food safety clearances around the world.

19 Just wanted to read some
20 highlights from our recommendation. So
21 Valerie, perhaps you could go to category one,
22 question two.

1 It is manufactured in a manner
2 very similar to other materials that are
3 already on the national list, and so as we
4 evaluated its environmental and human health
5 impacts, we considered the fact that there are
6 similar materials that previous boards have
7 said there are maybe some impacts, but frankly
8 those are impacts that we think we can live
9 with given the food safety benefits of this
10 material.

11 One concern that two materials
12 that are currently on the list have, and those
13 are sodium and calcium hypochlorite, one
14 concern with those that previous boards have
15 is that they have the potential to form
16 trihalomethane compounds when they react with
17 organic material in the environment. And the
18 European food safety authority has reviewed
19 this material, the sodium chlorite, acidified,
20 and determined that those halomethanes have
21 not reported to be formed when this material
22 is used. So again that is a benefit over

1 currently listed materials.

2 We did, and we discussed this
3 yesterday, in our recommendation we were --
4 wanted to reflect that we understood that in
5 2003 the NOSB processing committee had made a
6 recommendation on the clarification of
7 chlorine contact with organic food. There is
8 quite a history on the annotations of these
9 materials that reflect some confusion about
10 whether or not they can be used in direct food
11 contact, or cannot be used in direct food
12 contact, and then at what levels. And so we
13 wanted to recognize that and be consistent
14 with that recommendation.

15 We did receive some public comment
16 that asked that in general for the chlorine
17 materials that those imitations be cleared up.
18 So we will be regrouping tonight to have an
19 annotation to either confirm that our
20 annotation we think is consistent with that
21 2003 recommendation or to adjust it slightly.
22 So more to come on that tomorrow.

1 The most important thing I think
2 for my fellow Board members to understand is,
3 our recommendation really reflects that we
4 believe that adding the appropriate tools, but
5 adding tools to the tool box of food safety
6 interventions is really really important. As
7 this business grows, as the complexity grows,
8 handlers really need to have the best tools
9 possible in that food safety tool kit.

10 We heard yesterday from the
11 petitioner that while there are similar
12 materials to the sodium chlorite acidified on
13 the list, that this really is a unique tool
14 that is used by a lot of manufacturers in a
15 multi-layer approach, and that is important.
16 Also it's used at very dilute concentrations,
17 so it is perceived as being more
18 environmentally benign than some other options
19 on the list like sodium hypochlorite. But
20 again, often needs to be used as a multi-
21 layered approach to ensure food safety.

22 Finally the 2003 recommendation

1 that I talked about before, specifically
2 speaks to the NOSB wanting to encourage
3 exploration of other methods, beyond the
4 materials that are on the list, for
5 disinfecting the water that is in crop
6 contact. So they do mention ozone hydrogen
7 peroxide, and peracetic acid. So there -- as
8 these sanitizers continue to evolve and there
9 continues to be innovation, I think we need to
10 encourage that by listing things that are
11 other tools in the tool box.

12 So finally on public comment we
13 did receive five public comments on this
14 material. All of them spoke to the need to
15 better understand the annotations. So as I
16 said we do need to work on that.

17 Most provided some specific
18 suggestions. One specifically said that
19 current annotations for chlorine materials in
20 general are not clear with regard to direct
21 food contact, and said that the annotations
22 should be made consistent with practice or

1 practice consistent with the annotations. So
2 that is perhaps some homework for us.

3 So again our recommendation is to
4 list this material.

5 Questions? Yes, Jeff.

6 CHAIR MOYER: Katrina, I notice
7 on your recommendation form that your vote was
8 split, and I was just wondering if either you
9 or someone from the committee could explain
10 that.

11 MEMBER HEINZE: I'm not
12 remembering that. So perhaps my fellow
13 members.

14 CHAIR MOYER: It was three to one
15 with one abstention, so there was a no vote
16 there; I'm just wondering what that position
17 represents?

18 MEMBER HEINZE: Does anyone
19 remember that? Miraculously, this was not a
20 just in time recommendation. So our memory is
21 failing us.

22 CHAIR MOYER: Unless somebody --

1 I mean maybe somebody else on the Board,
2 whoever voted no, could explain why they did
3 it, or maybe they don't remember?

4 MEMBER HEINZE: Does anybody
5 remember voting no on this?

6 CHAIR MOYER: I'm curious what
7 their opinion was that they voted no on. I'd
8 be curious.

9 MEMBER MIEDEMA: Katrina, I
10 remember the argument being that there were
11 substitutes, but I don't remember how I voted,
12 sorry.

13 SECRETARY WEISMAN: I was going
14 to say, I don't remember how I voted either.
15 But I do remember the discussion. It had
16 something to do with the fact that why do we
17 need this when we already have other things on
18 the list that serve the same purpose. And
19 there was a lot of back and forth about
20 whether this was more benign than things that
21 were already listed.

22 MEMBER HEINZE: We did at one

1 point go back to the petitioner with that
2 specific question that said, there are other
3 things on the list that are perceived to be
4 good substitutes. Why are they not good
5 substitutes? Why do we really need this?

6 And if I remember we had not
7 gotten that answer when we took our vote. But
8 the petitioner sent us a very nice couple page
9 response that articulated very specific
10 examples where producers or handlers need to
11 use this in addition to the things already on
12 the list, specifically peracetic acid. The
13 technical review had said peracetic acid could
14 be used in place of this material, and the
15 petitioner came back and said in fact that is
16 not the case, and here are some examples, and
17 I could make that available if you are
18 interested.

19 CHAIR MOYER: I appreciate that,
20 thank you.

21 MEMBER HEINZE: Any other
22 questions?

1 Thank you.

2 MEMBER DeMURI: Thank you,
3 Katrina.

4 The next item on the list were
5 205.605(b) is propane, and it's not for
6 barbecuing organic chicken. It was petitioned
7 as a propellant for organic cooking sprays.

8 Propane is a constituent of
9 natural gas and crude petroleum, and is
10 separated during the production of gasoline
11 using fractional distillation under pressure.
12 We consider it to be a synthetic for that
13 reason.

14 There are a couple of other
15 reasons why we did vote to not list this
16 substance on 605(b). CO2 is already listed
17 for this use and is used in the industry as a
18 propellant for various kinds of sprays
19 including organic cooking oil now. And
20 there's even probably a better application
21 than that is just a regular old hand pump
22 sprayer that may of us have that you can use

1 to pump oils out onto a cooking pan or
2 something to coat your cooking pans with
3 organic oil.

4 So as a committee we felt that
5 this was not an item that we should recommend
6 to be listed for those major reasons.

7 So the vote on this particular
8 substance was zero yes, five no, and one
9 absent.

10 Any questions on propane?

11 Okay, the next one, one of the
12 most complicated on the list here, this one
13 for 605(b) is lecithin bleached, and I'll pass
14 the baton on to Julie to discuss this item.

15 SECRETARY WEISMAN: The moment
16 you all have been waiting for.

17 I'm going to give Valerie a chance
18 to bring this up on the list.

19 This was both exciting and
20 challenging to work on for a number of
21 reasons. One of the challenging reasons we
22 discovered is that these criteria evaluation

1 checklists were developed really for the
2 purpose of adding materials to the list, and
3 we had to make some amendments to them which
4 I think probably we would be -- do well to
5 incorporate, and I will point them out to you
6 as we go along -- but we had to make some
7 amendments to be able to use them for the
8 purpose of removal from the national list.

9 The first one that you see
10 actually -- why does yours look different than
11 mine?

12 MS. FRANCES: I just did that for
13 the benefit of the audience.

14 SECRETARY WEISMAN: Okay. That's
15 because I'm not far enough down. Sorry.

16 So you can see that -- we added a
17 box that didn't use to be there, because it
18 used to be we were only talking about things
19 that were allowed or rejected. So that was
20 one liberty that we took.

21 But I don't want to spend the
22 whole time talking about the criteria

1 evaluation checklist.

2 The bottom line here is that --
3 well let's move -- let's move down. And then
4 we will go back to the vote.

5 In terms of category one, I think
6 that is big enough, that we see that there are
7 now alternatives available, notably organic
8 alternatives, which would address some of the
9 concerns about the use of hexane and
10 peroxides, where we have already seen
11 legislation that may restrict the oil
12 processing operations that use them.

13 And that same applies to the
14 second item about environmental contamination.
15 And we are talking here obviously about the
16 use of the listed material that we are
17 considering removing.

18 I'm going to skip down now a
19 little bit. I mean it was a fascinating
20 process, considering all of these from a
21 different perspective, but I don't really --
22 we want to move ahead because of time.

1 In terms of the material that we
2 are considering removing in a technical review
3 I'm using -- I'm going to question two here in
4 category two, is the substance formulated by
5 a process that chemically changes the
6 substance extracted, and that crude soy that
7 is obtained in conventional lecithin is
8 obtained from hexane extraction of soy flakes.
9 And then it's de-oiled using acetone.

10 The lecithin is bleached using
11 hydrogen peroxide and benzel peroxide. I do
12 want to note that in terms of hydrogen
13 peroxide actually is allowed for organic
14 production even, but the benzel peroxide is
15 not.

16 Question number four, I am
17 referencing the fifth item in category two,
18 which is, is there an organic substitute?
19 Yes, that there are numerous forms of organic
20 lecithin, and several different manufacturers.
21 I'm sure we are going to have a little bit of
22 discussion about that. There has already been

1 public comment. I know we are going to be
2 going back to that.

3 Is the substance essential for
4 handling of organically produced agricultural
5 products? We -- the discussion that we had at
6 the time, even though we have heard public
7 comment that questions this, is that we found
8 that there are a wide variety of organic
9 products that are currently available that
10 can't be made without an emulsifier, and that
11 lecithin is the primary emulsifier used in
12 those products; but again, I think the
13 question is, is the organic lecithins are
14 available for that purpose?

15 Is there a wholly natural
16 substitute product? The organic forms are the
17 only forms of lecithin that are being produced
18 without synthetic solvents and bleaching
19 agents. And we thought that that was an
20 important -- that makes them an important
21 alternative to the 605(b) listed materials.

22 I'm not -- you know I'm not sure -

1 - I'm feeling the time pressure.

2 CHAIR MOYER: No, no, you're
3 fine.

4 SECRETARY WEISMAN: The question,
5 are there alternative substances, again, we
6 know that there are forms of organic lecithin
7 which achieve light color without bleaching;
8 that those are available in commercial
9 quantities; and that there also are other
10 organic and conventional non-synthetic
11 materials, such as gum, which could serve
12 similar functions in certain cases.

13 Is there another practice that
14 would make the substance unnecessary? Again,
15 the organic version is obtained by expeller
16 press instead of hexane extraction. Using
17 different varieties of soy yielding lighter
18 colored oil, combined with filtration, have
19 been used to achieve the same effect as
20 bleaching.

21 So I'm going to move now into
22 category three, is the substance compatible

1 with organic handling? We never really -- we
2 never questioned that. Is it consistent with
3 organic handling? Again, we didn't ever
4 question that.

5 Is it compatible with a system of
6 sustainable agriculture? And that is not
7 applicable, because this is a handling, not a
8 production material.

9 Nutritional qualities, it's the
10 same either way. Not primarily used as a
11 preservative, not primarily used to recreate
12 flavors, colors, textures, or nutritive values
13 lost in processing.

14 And I'm going to skip seven
15 because that really more applies to on-farm
16 inputs.

17 Here's the fun one: commercial
18 availability, category four. Basically the
19 issue is that there are -- we see that there
20 are new methods for making organic lecithin
21 that is light in color using only allowed
22 methods.

1 There are numerous varieties of
2 light-colored certified lecithin, and in terms
3 of the quality the petitioner and the
4 technical review concurred that products that
5 are made with organic lecithin and the listed
6 material are indistinguishable. In other
7 words, looking at finished products that are
8 made with both.

9 Panel testing has been conducted
10 which confirms this. Then the question of is
11 there quantity sufficient, and the petitioner
12 states that there is currently unsold
13 inventory, and besides that additional
14 capacity available to make organic lecithin
15 sufficient to meet current requirements.

16 I imagine this is something that
17 will be part of our discussion -- I hope it's
18 going to be part of our further discussion on
19 this.

20 Regions of production, climate, we
21 did not think were applicable here. We do see
22 that there are at least four suppliers that

1 were identified of organic forms of -- organic
2 forms of lecithin.

3 It did not seem that weather is a
4 factor or trade-related issues. There were no
5 other issues that were presented which would
6 make us think -- and please keep in mind that
7 when we answered this set of questions in a
8 petition to remove, here we are evaluating the
9 organic form, the availability of the organic
10 form, as opposed to when this is part of
11 listing a 606 item.

12 Actually I'm not sure that that
13 was -- confusing, I hope it wasn't. But
14 anyway, based on our answers to these
15 questions on the criteria evaluation
16 checklist, we found by a vote of five no --
17 five voted in favor of removing, no one voted
18 against it, and there was one absent.

19 And we felt the reason why this
20 substance -- again, now, when it says the
21 substance failed criteria, it means that the
22 listed substance now -- in other words if we

1 were evaluating the listed substance for
2 addition now, based on the information that
3 was given in the petition, we would find that
4 it was failing the criteria in category two,
5 and also category four, because there are
6 organic -- two, because there are organic
7 alternatives available, and four, because we
8 believe that there is a commercially available
9 supply of the organic substitute.

10 And that's the story. Questions?

11 CHAIR MOYER: Discussion?

12 Questions? Gerry.

13 MEMBER DAVIS: So this is for
14 bleached fluid lecithin, correct?

15 MEMBER HEINZE: No, this is all
16 bleached lecithin.

17 MEMBER DAVIS: This is all
18 bleached lecithin, okay.

19 MEMBER HEINZE: All non-organic
20 bleached lecithin of any form to be removed.

21 MEMBER GIACOMINI: There was a
22 lot of discussion yesterday and in public

1 comment. Did any of that affect the
2 committee's view?

3 SECRETARY WEISMAN: Thank you. I
4 neglected a very important part of this
5 presentation, which is, yes, there was
6 actually I think there were a total of 267
7 written comments received on regulations.gov
8 ahead of the meeting for this material, not
9 counting comments that were made yesterday and
10 that we may still be hearing later today.

11 I want to say that of those 267
12 comments 240 -- let's see, do I have this
13 right? 243 of them were one template. That
14 was in support of removal, but they were all
15 identical comments.

16 There appear to have been a second
17 template that was being used also in support
18 of removal, and that was -- there were five of
19 those. And then there were -- and this is of
20 the comments that were specifically on the
21 removal of lecithin.

22 There were other comments made

1 referring to lecithin that were embedded in
2 multiple topic comments that were made, and I
3 haven't even included those in this tally.

4 But anyway of the original
5 comments that were made, five of -- there were
6 15 of those -- five supported removal and five
7 opposed, because they felt they needed what
8 they were referring to as the de-oiled
9 varieties. And there were also five that felt
10 that they needed non-soy varieties in order to
11 have -- the issue of allergies was basically
12 being raised. And there was some concern
13 which I think -- we do -- we take seriously,
14 that there may be non-soy varieties that are
15 not available as organics, so we will want to
16 figure out how to address that as well.

17 I guess -- I think there were also
18 -- I apologize that I probably am not giving
19 a lot of -- so much -- there may be -- have
20 been other comments that were part of the
21 multiple comment things, and I would say that
22 they were on both sides of the board. Some of

1 the lecithin comments were from the multiple
2 commenters were in favor of removal, and some
3 were opposed to removal. One of the reasons
4 people gave for opposing the removal was that
5 there were -- that there weren't enough
6 suppliers. And I think that we agree and we
7 understand that there aren't many. But I also
8 have to say that it doesn't -- there is a lot
9 of organic lecithin available; a lot of
10 varieties of organic lecithin available; and
11 you know, because this is new territory,
12 assessing commercial availability about a
13 product we are considering removing, I don't
14 think that it is going to get any better than
15 this. I mean perhaps one could argue that
16 with flavors there may be even more variety of
17 organic flavors available, and yet it still,
18 you know, is on the national list.

19 But I -- I think that if we are
20 not in a position to remove a product with
21 this -- from the national list with this
22 amount of organic alternative already in the

1 marketplace -- I'm not saying that there
2 doesn't need to be more, but I think that it's
3 going to take the act of deciding to remove it
4 to stimulate those additional suppliers that
5 we want to see.

6 And I can tell you as a
7 manufacturer and a developer of an organic
8 minor ingredient that I am lucky if I can be
9 the only player in the marketplace for more
10 than a year. And I would say that two years
11 is a maximum that I can hold on to my
12 advantage before other people are in there
13 nipping at my heels. And I believe firmly
14 that the same situation will be created for
15 this material if we vote to remove it.

16 MEMBER JAMES: And Julie, correct
17 me if I'm wrong, but didn't somebody say
18 yesterday that even if we did remove it it
19 would take time for that to actually happen?

20 SECRETARY WEISMAN: Well, I think
21 that we have to put our own sort of memory
22 together. I think that there is -- the time

1 between when we -- historically between when
2 we have made a decision -- and up to now they
3 have all been decisions to list -- has been I
4 think a minimum of 18 months and usually much
5 more than that. I mean we had a comment even
6 yesterday asking where is the docket for this,
7 where is the docket for that. It was decided
8 on two years ago.

9 And I'm not saying this to put any
10 kind of pressure -- I know the challenge the
11 program is up against in making all this
12 happen. And the only exception I will say
13 where they came through phenomenally was where
14 we made the 606 listings. I think three
15 months or four months later there was an
16 interim rule published. And the only reason
17 that happened was because they were already
18 working on whatever they have to do over there
19 to make Federal Register notices be published
20 before we had even made our votes with the
21 idea that if they had to take things out and
22 delete them they would.

1 So I would say that if we vote
2 tomorrow, it doesn't mean that the use of the
3 material goes away tomorrow. There is a good
4 18 months, two years, maybe more -- hopefully
5 not more -- before it actually becomes a final
6 rule. And I guess someone from the program
7 could correct me if I'm wrong. There would be
8 an interim rule first for something like this,
9 or not necessarily?

10 CHAIR MOYER: The Chair
11 recognizes Richard.

12 MR. MATTHEWS: It would be a
13 proposed rule.

14 SECRETARY WEISMAN: It would be?

15 MR. MATTHEWS: A proposed rule.

16 SECRETARY WEISMAN: A proposed
17 rule, so there would even still be -- we would
18 be getting some -- probably some feedback once
19 that was already a proposed rule.

20 MR. MATTHEWS: Yes, the only
21 reason the other one went as an interim file
22 rule was because of the Harvey suit.

1 SECRETARY WEISMAN: Right.

2 MR. MATTHEWS: OJC is not real
3 keen on letting us do any materials dockets
4 that don't first go through a proposal.

5 SECRETARY WEISMAN: Okay.

6 CHAIR MOYER: Joe, you had a
7 question. Then I had Hue second and then
8 Tracy and then Dan. Hue?

9 MEMBER KARREMAN: Maybe I missed
10 it, but I don't think so. But wasn't there
11 discussion yesterday about the de-oiled
12 variety and how that would be kind of cut off
13 from this, if that would be okay with the
14 petitioner and everything? Or is that a
15 different material?

16 SECRETARY WEISMAN: That's -- we
17 actually have another lecithin material that
18 we are going to be discussing, and there is a
19 little bit of complexity. And we will, when
20 we -- I will be making some comments in my
21 later presentation that is going to address
22 that.

1 CHAIR MOYER: Tracy.

2 MEMBER MIEDEMA: I have a process
3 question. Just for the most continuity in
4 this discussion, could we move up the 606 item
5 on lecithin and talk about them together?

6 CHAIR MOYER: Let Dan have his
7 comment first.

8 MEMBER GIACOMINI: Yes, when I
9 was reviewing the public comments on these and
10 just transferring them over to my computer
11 since I don't have online here, it seemed that
12 a lot of those public comments, while they
13 were form letters, they were very specific in
14 stating that there is organic soy lecithin
15 available, and that please not allow the
16 hexane varieties to continue in organic
17 production.

18 With that, and with the comments
19 from yesterday and some other speakers, is
20 there any consideration to limit this to only
21 taking off the soy portion?

22 SECRETARY WEISMAN: The issue of

1 hexane extraction has nothing to do with soy.
2 The soy piece goes to the issue of allergens,
3 unless I'm misunderstanding your question,
4 Dan.

5 MEMBER GIACOMINI: Removing this
6 from the list as you have, 605 whatever, I
7 don't know that part, (b), taking all bleached
8 lecithin off the list, it would also take all
9 canola bleached lecithin off the list and all
10 sunflower bleached lecithin off the list even
11 from conventional sources.

12 There is minimal -- we had very
13 limited evidence that that is available in any
14 kind of a commercial form. I'm just
15 wondering unless I misunderstood, I'm just
16 wondering, since much of the comment was
17 related to organic soy lecithin being
18 available, and there is whether we agree with
19 the allergen issue or not, there seems to be
20 a consumer demand for other types of lecithin.
21 And I'm concerned with a blanket elimination.

22 SECRETARY WEISMAN: I understand,

1 and I think maybe Tracy's suggestion that we
2 move into the other lecithin petition, because
3 I think that your -- I think that will be
4 addressed.

5 CHAIR MOYER: Steve, do you have
6 a problem with moving the other item up now?

7 MEMBER DeMURI: No, I don't. I
8 think that's a great idea. I do have one
9 comment to answer Dan's question. It's kind
10 of the chicken and the egg syndrome again,
11 that there is organic canola available and
12 organic sunflower. There is no reason why
13 manufacturers can't make organic lecithin out
14 of those organic sources.

15 CHAIR MOYER: In light of the
16 comments we just had, Julie, would you please
17 review the lecithin fluid unbleached?
18 Valerie, can you bring that up? I know we are
19 jumping out of order, I apologize.

20 SECRETARY WEISMAN: But we were
21 moving into 606 anyway; this just moves it up
22 the list of 606 items. Okay.

1 The way this was petitioned, I
2 guess I first want to address the way this was
3 petitioned, the petitioner petitioned for the
4 removal for the listing of lecithin -- for the
5 removal of fluid lecithin, unbleached lecithin
6 from 606. In other words it was their
7 intention to only remove the fluid forms of
8 unbleached lecithin.

9 And it has been pointed out over
10 the last day -- okay -- I wonder if I'm
11 jumping the gun, if I should just go through
12 the petition.

13 Actually I think these -- the
14 criteria evaluation checklists for these two
15 things were pretty similar. So I think I'm
16 not going to go through them all item by item,
17 because I think a lot of it was covered. I
18 hope I'm not making a procedural error here.

19 CHAIR MOYER: You might use it to
20 address Hue's question regarding the comment
21 yesterday.

22 SECRETARY WEISMAN: Remind me

1 again.

2 MEMBER KARREMAN: There was talk
3 about the de-oiled form either being allowed
4 or not. Petitioner was amenable to keeping
5 that allowed. So if you could --

6 SECRETARY WEISMAN: Right, so at
7 the time we voted on this, what we voted to do
8 was actually to -- we agreed with the petition
9 to remove the fluid portion of unbleached
10 lecithin, and what that would cause us to do
11 in effect would be for there to be an
12 annotation that says dry forms only.

13 I think we also -- and that is in
14 section C if you go back to the cover sheet of
15 this, if you can scroll back, what we've done
16 is -- what we are saying here is that numerous
17 varieties of organic fluid lecithin are now
18 commercially available that perform the same
19 function as fluid lecithin that is included in
20 the current lecithin unbleached.

21 And so to make that distinction
22 that you are talking about we proposed the

1 annotation listed under C there as that dry
2 forms only would be added to the current
3 listing of lecithin unbleached.

4 Now I think at this time I want to
5 -- so let me ask, does that -- and we heard
6 public comment from experts yesterday that
7 explained to us that dry is de-oiled; that
8 those are basically the same thing.

9 MEMBER KARREMAN: As long as the
10 petitioner is okay with that.

11 SECRETARY WEISMAN: Now we are
12 going to have a request I think for the
13 petitioner at this point, because a point that
14 was raised yesterday not during public
15 comment, which is why I want to make it public
16 now, is that the handling committee in coming
17 up with this -- in voting this way, in making
18 this recommendation, we were actually doing
19 something other than what we were petitioned
20 to do. What was petitioned was the removal of
21 fluid lecithin from 606. The only problem is
22 that there is no annotation on 606 that says

1 anything about fluid or dry. So we made
2 something up -- well, first of all, the
3 petitioner asked for something that wasn't
4 actually part of the listing, and then we made
5 something up to address that. And that may
6 not be a good precedent to set, to have the
7 Board come up with things that are not part of
8 what's petitioned, even though it was meant to
9 serve the function of what was petitioned.

10 So we want to -- the handling
11 committee discussed this, and we believe that
12 if we could suggest a friendly amendment --

13 CHAIR MOYER: Tracy, please.

14 MEMBER MIEDEMA: Julie, I'm not
15 sure if I heard you right, but I want to make
16 possibly a technical correction here.

17 What I believe we heard yesterday
18 from the public was that de-oiled and dry were
19 definitely not the same. And so de-oiled was
20 a process using a solvent removed the oil,
21 whereas dry was taking and spraying it onto an
22 augur or inert, so I think I just maybe heard

1 you say that they were the same.

2 SECRETARY WEISMAN: No, the
3 conventional, the non-organic lecithin that is
4 available as dry is all -- is de-oiled
5 lecithin. The only dry lecithin that is being
6 marketed is this organic lecithin that is
7 being spray dried onto say maltodextrin or
8 possibly could be spray dried onto other
9 carriers.

10 So anyway what we think would be a
11 cleaner process that doesn't set maybe
12 unwanted precedents for future Boards is if
13 the petitioner would agree to a friendly
14 amendment that they amend what they're
15 petitioning in the following way, that rather
16 than petitioning for the removal of fluid
17 lecithin from the listing of lecithin
18 unbleached on 606, that they petition to --
19 that they accept the idea that this petition
20 is really to change the listing, of lecithin,
21 from lecithin unbleached to read, lecithin de-
22 oiled forms only. We believed that that would

1 serve the same function.

2 So is there --

3 CHAIR MOYER: At this point I
4 think what we should do is call the petitioner
5 to the podium and ask him if he would accept
6 that amendment.

7 Is the petitioner here? The Board
8 recognizes Lynn Clarkson.

9 MR. CLARKSON: Dear NOSB, we
10 would accept that amendment. We think that
11 makes it clearer. We think that provides
12 flexibility, and addresses the issues that
13 were brought up by opposing comments
14 yesterday, and supports the development of
15 more organic ingredients.

16 So we accept.

17 CHAIR MOYER: Questions from the
18 Board to the petitioner?

19 MEMBER KARREMAN: So could that
20 officially be said, what the amendment is just
21 at this time since he is right up here.

22 SECRETARY WEISMAN: Yes, so

1 therefore, the item that we will be voting on
2 tomorrow is going to be a petition to change
3 the listing of lecithin on 606 to de-oiled
4 forms only.

5 CHAIR MOYER: Point of order, the
6 executive director has a question or a point.

7 MS. FRANCES: I guess in light of
8 all this discussion going on regarding
9 synthetic and non-synthetic and non-ag and ag
10 and the fact that the de-oiled forms are using
11 solvents such as hexane and acetone, whether
12 that would really render this appropriate to
13 be listed de-oiled only on 606, and whether or
14 not it should be 605(b) and commercial
15 availability applied to that instead.

16 SECRETARY WEISMAN: I'll take a
17 stab at it, and I'll turn it over to you if
18 you don't think -- it actually -- as far as I
19 understand all of the conventional lecithin,
20 including that currently listed on 606, also
21 includes -- is also produced using those
22 ingredients. So it would not be putting

1 anything different on 606 than what is already
2 there.

3 CHAIR MOYER: Joe.

4 MEMBER SMILLIE: I also believe
5 that that is an important issue. It was
6 addressed by the materials working group.
7 It's an open question. I don't want to get
8 the two issues together.

9 What we want to deal with is the
10 lecithin issue. The whole question of
11 solvents used on 606 materials is an important
12 question but it's a different question. So I
13 don't want to deal with both questions at
14 once.

15 So I would say let's stick with
16 the way we're going, and the annotation, the
17 new petition, and not get into what is a
18 separate and distinct issue as far as the
19 nature of processing for 606 materials.

20 CHAIR MOYER: Are there any
21 questions for Lynn that he might be excused?

22 MR. CLARKSON: Let me add that I

1 agree with what Julie and Joe said, that it's
2 a separate issue. You are not -- it's already
3 there; it's being used in that form today.
4 You are not putting something new into the
5 pool that wasn't there before.

6 So I accept that. I agree that
7 the solvent extraction issue is an important
8 issue to be taken up at some future time.

9 So I accept your amendment as
10 read.

11 CHAIR MOYER: Thank you, Mr.
12 Clarkson.

13 Julie?

14 SECRETARY WEISMAN: I also wanted
15 to make one more clarification that might not
16 be obvious from this wording change that has
17 been proposed. By making this change we have
18 also taken the word, unbleached, out of the
19 listing, which means we are leaving room for
20 bleached forms of lecithin as they -- to be
21 also included, and it also leaves room for --
22 within that de-oiled, it can be from any seed

1 source. It can be from canola, it can be from
2 sunflower, it can be from other sources that
3 would not pose allergy problems for people who
4 are trying to avoid soy.

5 CHAIR MOYER: Dan.

6 MEMBER GIACOMINI: I didn't hear
7 the very end of what you were saying there,
8 Julie; I apologize for that, because the first
9 part of it caught me.

10 If we go to that chart that Dr.
11 Szuhaj gave us, and you look at de-oiled only,
12 that does not include bleached. That does not
13 include -- oh bleached, de-oiled only, but no
14 other forms of bleached. Okay, all right.

15 SECRETARY WEISMAN: I mean I will
16 clarify. I think that the presentation that
17 we saw yesterday clarified that the bleaching
18 is done with the use of hydrogen -- to the
19 extent that the bleaching is done with
20 hydrogen peroxide it will not be a problem for
21 a 606 listing, because hydrogen peroxide is an
22 allowed material in organic production, let

1 alone on a non-organic ingredient.

2 CHAIR MOYER: Steve and then Joe.

3 MEMBER DeMURI: The other

4 important distinction here is that it moves

5 all the lecithin to 606, and it subjects it to

6 commercial availability scrutiny by the

7 certifiers as well. So it is definitely a

8 tightening of the listing.

9 CHAIR MOYER: Joe.

10 MEMBER SMILLIE: Well, both Julie

11 and Steve have made the points that I was

12 going to make. But there is one final point,

13 and that is, some of the presentation that was

14 given yesterday that was captured in these

15 documents, the majority, I'm not saying all of

16 it but the majority, for example from Amy's

17 Kitchen, from Hane, their request was, I'll

18 just use one, to deny companies the right to

19 use de-oiled, powder bleached lecithin will

20 result in the loss of many organic products

21 from the marketplace.

22 I think we solved that particular

1 comment, and another one saying this company
2 currently uses de-oiled lecithin in several
3 made-with organic products. This lecithin is
4 an important ingredient.

5 So I think -- I'm not saying it's
6 a perfect solution, but I think it answers the
7 majority of both the petitioners and the
8 people who originally opposed the petition and
9 did these presentations.

10 I've gone through all the
11 presentations, and I'm not saying it's 100
12 percent, but the great bulk of it is simply
13 asking for the de-oiled.

14 CHAIR MOYER: Thank you, Joe,
15 that's a very good point.

16 Any other comments for Julie
17 before we move on to chicory root? Steve, the
18 floor is back to you.

19 MEMBER DeMURI: Thank you. Good
20 job, Julie, on a couple of very complicated
21 petitions. But now that you've caught your
22 breath you are up again for chicory root for

1 606.

2 SECRETARY WEISMAN: All right.
3 This actually we can make quite short and
4 sweet. We received a petition quite some time
5 ago for the addition of chicory root extract
6 to 606. And it did kick around between the
7 handling committee and the program for awhile
8 trying to figure out exactly whether it was
9 already covered, whether it was not.

10 But the determination that we made
11 upon reviewing the petition is that the --
12 even though chicory root extract as a broad
13 category was what the petitioner was asking to
14 have listed, the manufacturing process that
15 they described in the body of the petition
16 really actually described the manufacturing
17 processes for inulin and okeofructose, both of
18 which are derived from chicory extract. And
19 the handling -- both of these are materials
20 that were previously petitioned for inclusion
21 on 606. So we felt that the petition was
22 redundant.

1 So we went back to the petitioner
2 and asked, just to make sure, are you wanting
3 something other than these two already listed
4 items to be added to the list. And they said
5 no.

6 So we found that the petition
7 didn't really require any further action
8 because they materials that they were really
9 looking for are already on the list.

10 In addition to that I would also
11 like to add on the note of commercial
12 availability that organic chicory root extract
13 is widely available and being used currently.
14 So if they wanted that organic chicory root as
15 a broad category for 606 we probably would
16 have voted no, because it is commercially
17 available.

18 Questions?

19 CHAIR MOYER: Next item, Mr.
20 Chairman.

21 MEMBER DeMURI: Thank you again,
22 Julie.

1 The next item on our docket here
2 for 606 is red corn color. That was one that
3 I reviewed.

4 And it's petitioned as a use as a
5 color in a variety of organic foods,
6 beverages, so confectionary, there were a
7 whole host of things that they were asking to
8 be able to use this color in.

9 It is produced by a simple
10 extraction process. The petition did have
11 some CPI information in it. But in conferring
12 with the program when I was reviewing this,
13 Mr. Pooler verified that it was a fairly
14 benign process, simple extraction process,
15 without the use of any synthetic solvents or
16 other prohibited materials. So it did meet
17 the category one and three criteria, so that
18 was not an issue for us for this particular
19 substance.

20 But the petition did not
21 sufficiently address the availability criteria
22 in our mind. There are already several red

1 color extracts available, beets and a few
2 other things that can be used to color organic
3 foods red. The petition did not address why
4 they could not use those colors; they are
5 already listed on 606.

6 Additionally we know that there is
7 a good amount of red corn available on the
8 market in organic form, and the petitioner did
9 not address why they could not source the
10 organic red corn and find a processor or a
11 manufacturer that could make a color for them
12 out of that organic available corn.

13 So based on that we did not feel
14 it was sufficient in its availability
15 criteria, and we did vote to reject this
16 particular substance for 606. The vote was
17 zero yeses, four noes, one absent, and one
18 abstention.

19 Any questions on red corn color?

20 Okay, the next item we have up is
21 going to be presented by the handling
22 committee wise man, Gerry Davis: myrrh.

1 MEMBER DAVIS: Where's the
2 frankincense? The petition is for the
3 inclusion of myrrh essential, commiphora
4 myrrha because there are more than one plant
5 that some people use the name myrrh on, for
6 use in perfume.

7 Going to category one on the
8 evaluation form, all of it was pretty
9 straightforward as far as effects on humans or
10 the environment. And we felt there were no
11 issues there.

12 Category two we found that
13 question one is it formulated by a chemical
14 process? No, it's just steam distillation of
15 a resin from the plant sap of this particular
16 tree. And it's not changed chemically in
17 question two, the substance used is the
18 material extracted from the natural plant
19 source with no chemical change.

20 Question five: Is there an organic
21 substitute? No. Petitioner claims that no
22 organically produced myrrh oil is available.

1 Handling committee members -- more than just
2 myself -- checked with Internet searches and
3 found no evidence of any organic sources.

4 Is it essential for handling the
5 organically produced agricultural product?

6 Yes, petitioner claims the substance is a
7 vital component of certain perfumes, and that
8 there is no wholly natural substitute product
9 because the fragrances are specific to this
10 plant material.

11 The material is produced in
12 regions of the world such as Somalia and Yemen
13 -- two of the biggest producers of it. So in
14 question 10, is there another practice that
15 would make the substance unnecessary -- it
16 seemed like it would be a good candidate for -
17 - if there were fair trade marketing efforts
18 exerted on those regions, to work directly
19 with the indigenous harvesters of this wild
20 plant . There could be some data certified
21 organic wild harvested product, but it doesn't
22 exist today.

1 Category three, important point,
2 question one, is the substance compatible with
3 organic handling? We said yes, but it's
4 conditioned on something that should be
5 obvious but needs to be pointed out. As long
6 as this substance is used as a component of
7 organically certified perfumes and is part of
8 the 5 percent non-organic portion, and the
9 resultant perfume product cannot have myrrh in
10 the name.

11 So that was information for the
12 complete for the certifiers and petitioner
13 alike that they can't turn around and call
14 this myrrh perfume if they use this material.

15 CHAIR MOYER: Point of
16 clarification from Julie.

17 SECRETARY WEISMAN: Yes, the
18 reason why that comment is included here is
19 because you cannot use the word, organic, to
20 modify the name of something that was not, an
21 ingredient that was not actually organic. So
22 you could call it myrrh perfume, you just

1 couldn't call it organic myrrh perfume. And
2 you could call the product organic whatever
3 lotion the myrrh -- well, I don't want to get
4 into the whole personal care thing, but say
5 hypothetically it's a body oil, you could call
6 it -- which I think actually is what it is
7 being used in -- you could call it organic
8 body oil, and then some place else on the
9 label it could say that this is myrrh, but you
10 can't organic myrrh body oil because the myrrh
11 is not organic.

12 MEMBER DAVIS: Thank you for that
13 clarification.

14 So going down to category four,
15 the commercial availability, we felt that the
16 description provided by the petitioner was
17 plausible, that the material in its necessary
18 form and quality and quantity is not currently
19 available in organic form. And part of the
20 reason was on question five, number D, that is
21 related to trade-related issues such as civil
22 unrest. It may temporarily restrict supplies.

1 The petitioner made the case for
2 the difficulty of establishing a certified
3 organic supply due to the inherent civil
4 unrest of the main regions of production such
5 as Somalia and Yemen.

6 So going back to the front page,
7 the committee voted four yes, zero no, two
8 absent, to allow the inclusion of myrrh
9 essential oil for the use in perfume on the
10 national list in Section 606.

11 Any questions? Hue.

12 MEMBER KARREMAN: Not really a
13 question, but I bring this up at other times
14 with plant names. You have a Latin binomial
15 there, and I think it should specify
16 commiphora myrrha, because there is commiphora
17 momo which is also called myrrh. In other
18 words, use the Latin binomial, and we've
19 discussed this before.

20 MEMBER DAVIS: That's what that
21 is, but I didn't realize there was another
22 species that they also call myrrh. The

1 information that I went over had a completely
2 different genus and species, one plant could
3 be used as myrrh.

4 CHAIR MOYER: Hugh, you want it
5 different than the way it's stated up there in
6 that gray box?

7 MEMBER HALL: If we have done it
8 this way before, if you say myrrh essential
9 oil up there.

10 SECRETARY WEISMAN: We went
11 through this with seaweeds also.

12 MEMBER KARREMAN: Yes, we did.
13 And we said that we gave the actual Latin
14 binomial itself and that was it I thought. Or
15 how did we do that? However we did it before,
16 let's do it the same way again, that's all
17 I'm saying.

18 SECRETARY WEISMAN: Let's go back
19 to the video, and tomorrow it will be
20 corrected.

21 MEMBER DAVIS: So let me try to
22 understand your question. You are saying

1 besides commiphora myrrha, there is also
2 another commiphora different species that is
3 also a myrrh?

4 MEMBER KARREMAN: Correct. To
5 the best of my knowledge from an in vivo
6 experiment done with sheep parasites in Egypt.

7 (Off mike remarks)

8 CHAIR MOYER: Okay, well, Julie.

9 SECRETARY WEISMAN: I just also
10 wanted to sort of highlight one issue that
11 there are a few historical things that are
12 going on with petitioned materials for
13 handling in this meeting, and myrrh is also
14 one of them. Because I think this is the
15 first time we've had a material petitioned
16 onto the national list that was not for a food
17 product. But this as far as I know this
18 doesn't have any food uses. It's really
19 specifically being asked for because it's used
20 in personal care.

21 CHAIR MOYER: Dan.

22 MEMBER GIACOMINI: Yes, on the

1 question of the listing --

2 CHAIR MOYER: You can sit way
3 back, I think, and still come in.

4 MEMBER GIACOMINI: On the
5 question of the listing, we have listing of
6 seaweed, and then with the Latin name in
7 parentheses; we have a listing of hops, and
8 the Latin name in parentheses. I don't see
9 the other seaweed that we have listed here,
10 but there are two examples.

11 We also did the same with the
12 alvia, with the common name and the Latin name
13 in parentheses. So I think you're fine.

14 CHAIR MOYER: Any other questions
15 or comments? Kevin.

16 MEMBER ENGELBERT: I am just
17 curious, given the fact that this is one of
18 the first petitions or the first petitioned
19 material for anything other than a food or a
20 food contact substance, why you didn't request
21 a TAP, or what gave you the confidence that
22 you could find out enough about it without a

1 TAP?

2 MEMBER DAVIS: I think this is a
3 good example of a very simple material. If
4 you read the information provided and do
5 searches of information that are available,
6 this is a good example where it's simple
7 enough that just the normal expertise of the
8 committee would function as the advisory
9 panel.

10 It just didn't seem to be
11 complicated, and I didn't hear any public
12 comments saying otherwise.

13 MEMBER ENGELBERT: That was my
14 assumption, but I wanted to make sure that I
15 was correct.

16 CHAIR MOYER: Tracy.

17 MEMBER MIEDEMA: As I look at
18 this now, and in light of the personal care
19 discussion, I have a little bit of a problem
20 with our annotation about it being for
21 perfume. I think it is very narrowly
22 construed, and there is no reason if we were

1 going to go ahead and list it on 606 that
2 someone couldn't put it in some other type of
3 personal care product. Or maybe it is edible.
4 I just don't know that we should start
5 labeling it that way.

6 CHAIR MOYER: Was that what the
7 petitioner specifically asked for?

8 MEMBER DAVIS: That's what they
9 asked for, so that is the only reason it's on
10 there. But it's a very good point, I agree.

11 CHAIR MOYER: Tina.

12 MEMBER ELLOR: I just looked it
13 up on the food chemicals codex and it's listed
14 as a flavoring agent.

15 CHAIR MOYER: Bea.

16 MEMBER JAMES: I agree with what
17 Tracy just mentioned, but I know that at
18 retail there are a whole line of essential
19 oils that are agricultural that are certified
20 organic that a lot of retailers are currently
21 selling.

22 MEMBER DAVIS: And we considered

1 and looked at sources of myrrh essential oil
2 as part of the literature search looking for
3 organic forms. And there were a couple of
4 suppliers that had very extensive organic
5 essential oil listings, on and on and on, but
6 when it came to the myrrh, not organic.

7 CHAIR MOYER: Gerry, is that
8 because there is no organic myrrh, or just
9 because there is no organic myrrh oil? We
10 just want to avoid where Marty Mesh comes back
11 and for the next five years and tells me he
12 has organic myrrh, and nobody ever asked for
13 organic myrrh oil. So there is no organic
14 myrrh; is that what you're saying?

15 MEMBER DAVIS: The presentation
16 that the petitioner made concerning the fact
17 that there is no infrastructure or
18 certification efforts being made to work with
19 that indigenous wild harvested supply of the
20 raw material. So it's a step that could be
21 made. Perhaps the 606 listing will encourage
22 that. But at this point there is just nothing

1 that has been drawn together to deal with that
2 wild harvested issue.

3 CHAIR MOYER: I think this is a
4 very good case for those folks who said 606 is
5 a shopping list for entrepreneurs, that would
6 bring them out. Tracy.

7 MEMBER MIEDEMA: So procedurally
8 when it's time to vote tomorrow, can I make
9 the motion without the word, perfume?

10 CHAIR MOYER: I am just not sure
11 -- because the petitioner specifically asked
12 for it this way, can we change the
13 petitioner's request?

14 SECRETARY WEISMAN: I'm going to
15 ask a clarifying question.

16 CHAIR MOYER: Wait, let me get
17 the program to answer that.

18 MR. MATTHEWS: Yes, if you decide
19 it's something that can go onto the list,
20 their recommendation can be for whatever uses
21 are there; it doesn't have to be just for the
22 petitioned use. So if you want to open it up

1 to all cosmetics or all body care products, or
2 all cosmetics and body care, that is perfectly
3 all right for us.

4 MS. ROBINSON: Jeff, let's not
5 create a single use. That also permits in
6 effect a monopoly use for one outlet there,
7 just to be used for perfume. There may be
8 other uses that we just aren't aware of.

9 MR. MATTHEWS: And the other
10 thing is, if you say for perfume only, you may
11 in three months get a recommendation that you
12 now approve it for hand lotion, or you may
13 then get another one after that that wants to
14 put it into Tracy's soap.

15 MS. ROBINSON: Don't annotate the
16 use; recommend the substance.

17 CHAIR MOYER: I think that is
18 good advice. So there is the answer to your
19 question, Tracy.

20 MR. MATTHEWS: You do realize
21 though if you take it out without any comment
22 you would be including it in food? Okay.

1 CHAIR MOYER: Joe.

2 MEMBER SMILLIE: Tina, does it
3 have a CAS number?

4 MEMBER ELLOR: Let me pull it up
5 again. Yes, it did have a CAS number. I
6 didn't know what it was.

7 CHAIR MOYER: Any other questions
8 or discussions on the myrrh?

9 MEMBER DeMURI: Just wanted -- I
10 did do a literature search on myrrh as well,
11 and I did find some references to it being
12 used in beverages. So it potentially could be
13 used in food.

14 CHAIR MOYER: Why not?

15 Steve, back to you.

16 MEMBER DeMURI: Thank you.

17 Hugh is another wise man on the
18 Board apparently after his myrrh expose.
19 Okay, the last item we have for today is
20 another 606 item. It's wheat germ, and
21 Katrina was the reviewer of that substance, so
22 Katrina.

1 MEMBER HEINZE: I'm really
2 excited about this after all that
3 conversation.

4 Okay, wheat germ, a material that
5 I think hopefully most people are familiar
6 with, was petitioned for listing on 606. It's
7 intended use is as a flavor or to add
8 nutrition, supplemental nutrition, not remove
9 nutrition, in baked goods.

10 The petitioner did acknowledge
11 that organic wheat germ is sometimes
12 available. They were just not able to find a
13 quantity or consistency of supply necessary to
14 meet their needs.

15 So if you remember on 606 there
16 are three things: form, quality and quantity.
17 So this is a quantity.

18 So their justification was that
19 they contacted the five largest suppliers of
20 organic wheat flour, you know folks who should
21 have a lot of wheat germ hanging around, and
22 were unable to source. They need about 10,000

1 pounds a year; they were able to get 4,000
2 pounds.

3 So I can hear the eyebrows going
4 up in the crowd, and going up on the panel,
5 and ours did as well. We were quite surprised
6 by this, and we all said, oh, that can't be
7 right, so we did our standard Internet search.
8 On my weekly shopping trip to my local coop I
9 said, oh for sure I can find organic wheat
10 germ somewhere in this store. Nope, I took
11 twice as long to go shopping but couldn't find
12 it.

13 So then we did some deeper
14 research and really did an investigation to
15 evaluate this, and we did find support for the
16 petitioner's claim.

17 So I'll take you through that real
18 quick. So organic wheat germ is 2 to 2-1/2
19 percent of the wheat berry. In a typical
20 flour mill operation you will reasonably
21 remove a much smaller percentage, so maybe
22 half to 1 percent of the berry will come off

1 as germ.

2 The germ is very high fat, so it
3 has a very, very short shelf life, as little
4 as three days. So in a conventional operation
5 you would take that wheat berry off. Then you
6 have to send it off to be stabilized to
7 prevent rancidity. So the methods to
8 stabilize that are commonly used are steam
9 either direct or indirect, you toast, use
10 infrared, or there is chemical treatment,
11 although even in a conventional stream that
12 chemical treatment is used for non-food-grade
13 applications. So really the stabilization
14 that you would be talking about would be steam
15 toasting or infrared.

16 And that stabilization has to
17 happen really at the milling operation because
18 of that short shelf life. Or you need to have
19 a high quantity of germ that is coming off
20 your mill to be able to ship it expeditiously
21 and get it stabilized.

22 So what the petitioner said and

1 was supported by my investigation is, handlers
2 of organic wheat fine tune their mills to
3 direct their waste streams. So you have a
4 choice in a milling operation to divert your
5 germ stream as well as your bran stream. You
6 can either divert it to waste, or you can
7 divert it to go into your flour stream, the
8 bulk of organic flour millers divert it into
9 their flour stream so that they are not losing
10 material. And they just consider it value
11 added. So in effect when you're buying white
12 flour you are getting some germ, so it's a
13 little bit more whole wheat than it would be
14 otherwise.

15 So that's typically where it goes.
16 It goes straight into the white flour and gets
17 sold.

18 So of the five handlers that the
19 petitioner contacted, four send the germ into
20 the white flour and sell it that way, and one
21 diverts it to animal food.

22 So given the small amounts that

1 come from the mill balanced with the new need,
2 that is where the petitioner ran into trouble
3 with this material. And a large organic flour
4 mill today would produce maybe 2,000 pounds of
5 organic germ in a day's production. So to
6 meet the petitioner's need, that's five days
7 of production. And it just at that point
8 becomes impractical for that organic flour
9 miller to build the infrastructure to process
10 the germ. You are talking, you might run your
11 mill 360 days a year, and for only five days
12 you are going to build this huge
13 infrastructure to process the germ. And now
14 you are talking one miller out of the many
15 millers who might be doing this.

16 So this is a matter of matching
17 need to demand. You need to create a higher
18 need in order to create just the practicality
19 of building that infrastructure to stabilize
20 the wheat germ.

21 So really the conundrum here is
22 that consumers need to purchase more organic

1 products that have wheat germ in it in order
2 to drive this. And consumers of this product,
3 the petitioner has sold these organic products
4 with wheat germ in them for 25 years, so their
5 concern obviously is having to take this
6 product off the market.

7 So our recommendation reflects
8 that despite our surprise we felt that
9 petitioner's justification was supported by
10 our independent investigation.

11 So I want to go back to our
12 recommendation. I didn't do this with the
13 sodium chlorite, but I'll go back and look at
14 the first page.

15 Obviously this is an agricultural
16 product. It just goes through the mill, so
17 there is -- if it meets the criteria for
18 impact on humans and environment, we felt that
19 it met the criteria for essential
20 unavailability as well as compatibility and
21 consistency. And we did feel that the
22 petitioner demonstrated the fragility of

1 supply in this case, since there were -- we
2 thought they had gone to quite a bit of work
3 to try to find the 10,000 pounds they needed.

4 So we voted I think six to zero to
5 list this material.

6 CHAIR MOYER: Any questions or
7 comments from the Board? Kevin?

8 MEMBER ENGELBERT: Yes, it's very
9 unusual for -- you said part of the supply
10 went to livestock feed?

11 MEMBER HEINZE: Yep, and I will
12 in full disclosure say, I work for the company
13 that does that. So we, to meet our quality
14 specs in our flours, we don't put the germ
15 into the white flour that we sell, so we
16 divert it and sell it to conventional animal
17 feed.

18 MEMBER ENGELBERT: Because it
19 doesn't meet the quality specs for this buyer
20 also? Or it doesn't meet your quality specs?

21 MEMBER HEINZE: No, to meet our
22 white flour quality specs, we do not divert

1 our germ stream back into the white flour.

2 So therefore it's a waste stream from our
3 milling operation, and our waste stream is
4 solid to animal feed.

5 MEMBER ENGELBERT: And explain
6 again what that isn't available to another
7 purchaser?

8 MEMBER HEINZE: Because you have
9 to stabilize it. Someone could buy it. So on
10 the once a month that we run organic flour
11 someone could drive up a truck, they could buy
12 the 2,000 pounds. They would then have to
13 ship it someplace where they could stabilize
14 it. It has to be stabilized within three
15 days. They would have to convince the company
16 that stabilizes it to do a run of 2,000
17 pounds, and it's such a small run that it's a
18 size problem. I see I am not making sense on
19 that.

20 MEMBER ENGELBERT: Well, you are.
21 But this harks back to the problem we had last
22 year with the -- I mean it seems like if there

1 is a will, there's a way. And if it's
2 available, rather than divert it to livestock
3 feed, which normally is where things go
4 because it's cheap or there is some type of
5 defect, if this company coordinated, not just
6 with your company, but all the processors of
7 organic wheat or even contracted with growers
8 of organic wheat, that they could make that
9 happen.

10 MEMBER HEINZE: There is no lack
11 of organic wheat; that is not the issue.

12 I did, and I'll be fully
13 transparent, I said, hey, cool, there is a
14 market for us on this; go team go. And I got
15 laughed at.

16 They said that in order to make
17 this practical the need would have to be like
18 100 or 1,000 times more to even make it
19 practical. Just the amount of resources to
20 build that, it is just -- the need is just not
21 there.

22 CHAIR MOYER: Barry.

1 (Off microphone comments)

2 MEMBER HEINZE: There was no
3 technical review again. On a material like
4 this it's pretty straightforward. If you
5 worked in milling --

6 MEMBER GIACOMINI: Barry,
7 microphone.

8 MEMBER FLAMM: Oh, thank you. My
9 question was, is there a TAP on this material?
10 Katrina, I think you answered that you didn't
11 see the need because it was straightforward.
12 And to me it doesn't seem straightforward.
13 I'm not very convinced by what I've heard so
14 far, and I don't -- where is the location of
15 this petitioner?

16 MEMBER HEINZE: I'll let them --

17 MR. FLACK: In any case I know in
18 Montana there is, as you point out, a huge
19 acreage of organic wheat growing all the time.
20 There are a million facilities and they are
21 looking for new types of markets.

22 So I just --

1 MEMBER HEINZE: But again the
2 petitioner went to quite a bit of work to try
3 to find someone who would do this for them,
4 and had no one step up to the plate. So this
5 is the debate we have every time with these
6 606 materials. If you put them on the list
7 does that create someone who says, I actually
8 can do that. In this case the petitioner
9 tried.

10 CHAIR MOYER: We have a bunch of
11 folks that want to comment. Bob.

12 MR. POOLER: Yes, Bob Pooler. I
13 just wanted to address Barry's question about
14 petitioner location. Bountiful Berry is
15 located or headquartered in the state of
16 Maine.

17 CHAIR MOYER: Thank you.
18 Dan you had your hand up, then
19 Tracy.

20 MEMBER GIACOMINI: Yes, I
21 apologize if I talk too much here for a
22 second. We are looking at a product here that

1 we know we have a tremendous amount of organic
2 raw material, but there are problems in the
3 processing and stabilizing and that thing. So
4 we are looking to put it on 606.

5 At this very same meeting -- and
6 we are saying we are doing it because of low
7 quantity -- at the very same meeting we are
8 running through a couple of voting
9 manipulations to take away what has been in
10 the marketplace an alternative source of
11 lecithin that has been conventional, that is
12 not traditionally from soybean, with no
13 information on whether there is enough of that
14 product to really be making organic lecithin
15 from those sources. And when the first -- the
16 first two years ago I believe it was we had a
17 petition here for I believe it was instant
18 powdered milk. The petitioner had done a
19 tremendous amount of work going through all
20 the different milk powdering facilities they
21 could. Everybody would make powdered milk,
22 but nobody would make instant milk. They

1 found one facility that would make instant
2 milk but they wanted them to buy like a four-
3 year supply a tremendously high price.

4 We rejected that petition and not
5 allow them to use a conventional, so in a
6 sense they are taking products off the market.
7 I believe it was used in baking. I think if
8 we go along with what we are looking to do
9 today on the lecithin and looking at what
10 we've done in the past, this sounds like a
11 real exception to our historic record.

12 CHAIR MOYER: Tracy.

13 MEMBER MIEDEMA: I guess I just
14 wanted to point out, this is some of the
15 hardest stuff we do. And it's really the no
16 fun part, because there's going to be losers
17 in this no matter what. And we really have to
18 face the fact that if we put this on 606 a
19 small bakery will have to buy the organic
20 version whereas a very large bakery would get
21 a free past.

22 However if we don't put it on 606,

1 there's all kinds of manufacturers out there
2 that want to get in organic, and there is no
3 opportunity list out there spurring the
4 organic version to be produced. And a most
5 likely scenario is that wheat germ will
6 languish along, and an organic version will be
7 less likely to surface in the marketplace.
8 The impetus just may not be there.

9 So we don't know how the chips are
10 going to fall when we do this, and frankly
11 there can and will be winners and losers no
12 matter what we do.

13 CHAIR MOYER: Julie.

14 SECRETARY WEISMAN: Yes, I just
15 wanted to see if I could possibly help Dan not
16 see as opposing actions the fact that we are
17 recommending the listing of this on 606 at the
18 same time that we -- actually that is part of
19 the same progression. And I -- you don't get
20 to the point where you are able -- consider
21 taking something off of 606 unless you have
22 done something to spur a need for that

1 material being used, to allow it to be used in
2 its non-organic form. And currently the only
3 way to do that is to list it on 606.

4 I almost am tempted to ask Lynn
5 Clarkson to step back up to the podium,
6 because I would be interested in his comments
7 about if lecithin were not on the national
8 list would he ever have dreamed of making the
9 investment and engaging in the entrepreneurial
10 activity that he's engaged in that makes
11 organic lecithin available. I see that he's
12 willing to do it, but I guess maybe I'm making
13 my point.

14 CHAIR MOYER: Given the timeframe
15 we are operating under, the chair is hesitant
16 to call anybody to the podium at this
17 particular moment.

18 Gerry, you were next. Hue.

19 Tracy.

20 MEMBER MIEDEMA: One last
21 comment, I did vote yes to 606, so despite my
22 comments about small bakeries being forced to

1 organic, I endorsed the spurring of the
2 creation of organic wheat germ. And I think
3 that is how we should vote.

4 CHAIR MOYER: I also have a hard
5 time imagining that the petitioner is the only
6 potential customer for this product. And I
7 understand what you are saying about 606 but
8 you see the problem we have getting material
9 off the list once we get it on; it is not easy
10 to do. So you don't see it as a problem, I
11 know. Okay, but it's difficult to get it off
12 the list once it's on the list, and that's a
13 concern I believe some of us have on this
14 Board.

15 Katrina.

16 MEMBER HEINZE: I'll just make
17 two comments, one in my traipse about my
18 natural foods coop, there is a lot of wheat
19 germ I can buy but none of it is organic. And
20 then second, just a reminder, because it's on
21 606, and the handling committee says this
22 every time, doesn't mean that folks can just

1 use the conventional. They have to prove to
2 their certifier that they were unable to
3 identify any, right, so commercial
4 availability. So good debate, folks.

5 CHAIR MOYER: Okay, any other
6 comments or questions from the Board?

7 Steve, back to you.

8 MEMBER DeMURI: Okay, thank you
9 everybody. That concludes the petition
10 recommendations for us for today.

11 But I do want to mention, we have
12 10 sunset items coming up in 2011. There are
13 three for 205.605(a), and seven for
14 205.605(b). I won't take the time to explain
15 any of those, but please we do want public
16 comments over the next few months on those, so
17 we would greatly encourage you to do that.
18 And that will conclude our discussion for the
19 day from the handling committee.

20 CHAIR MOYER: Thank you, Steve,
21 and the handling committee.

22 The chair recognizes Richard

1 Matthews from the program.

2 MR. MATTHEWS: Yes, and I would
3 recommend that the Board move expeditiously on
4 these 10 materials, because in 2012 you will
5 have to have completed your review of some 160
6 other materials. So early next year we will
7 be putting out an AMPR on that one as well.
8 So time is short.

9 CHAIR MOYER: Well, if you were
10 trying to make us feel good, Richard, you
11 didn't.

12 (Laughter)

13 MR. MATTHEWS: 174 materials,
14 Barbara tells me. No, that's payback for
15 black hole.

16 (Laughter)

17 CHAIR MOYER: Okay, thank you
18 very much. That concludes our work plans and
19 the committee reports. The chair wishes to
20 thank all the committees and their members for
21 their tremendous effort and tireless
22 dedication to these issues and these

1 materials.

2 If you have never sat on a
3 committee, and some of you in the audience
4 haven't, you have no idea how much work and
5 dedication went into this. And whether you
6 agree or disagree with the outcome, as I
7 mentioned in my opening comments yesterday you
8 cannot fault this Board for the tremendous
9 amount of work they did.

10 So the Chair wishes to thank all
11 of you.

12 We are going to take literally a
13 five-minute break to the bathroom, and we are
14 going to be back with public comment.

15 And please, I mean five minutes.
16 We have to get out of here by 6:30 for this
17 Board to be able to get over to Kathleen
18 Merrigan's office, and we will be leaving on
19 time.

20 (Whereupon at 4:56 p.m. the
21 proceeding in the above-entitled
22 matter went off the record to

1 return on the record at 5:02 p.m.)

2 CHAIR MOYER: Okay, the Board is
3 seated. We have a quorum. Valerie, we are
4 going to get started.

5 Before we start with the list of
6 public commenters, I do want to mention that
7 during the break Harriet Behar let me know
8 that they made a phone call from the back of
9 the room to a food supplier, SK Foods, don't
10 know them, never heard of them. And they said
11 10,000 pounds of certified organic wheat germ,
12 no problem, got it. So it runs a little
13 contrary to what we were hearing earlier
14 today. So there is a phone number and a name
15 if somebody wants to call. But it does let
16 you know that the product quite possibly is
17 available in the quantity and quality that the
18 petitioner is looking for.

19 Thank you, Harriet, and whoever in
20 the back of the room supplied us with that
21 information.

22 Okay, moving along, public

1 comment. We are going to start with the list
2 as we have it posted here.

3 I will mention that the Board has
4 an appointment with Kathleen Merrigan. We
5 fully intend to make that appointment, and we
6 appreciate the public commenters keeping to
7 time and the Board minimizing the questions
8 and comments to specifically extracting
9 information from the presenter and not
10 necessarily from making windy comments. I
11 won't gavel anybody down, but I do appreciate
12 that, because we certainly want to make our
13 appointment.

14 I believe Joann Baumgartner is
15 number one on the list, is that correct? My
16 list is outdated.

17 I'm sorry, Deborah White. Is
18 Deborah in the room? And Joe Dickson on deck.

19 PUBLIC COMMENT

20 MS. WHITE: Good afternoon and
21 thank you for your time.

22 We are the Food Marketing

1 Institute believe these organic issues are
2 very important and we appreciate your
3 volunteer service in advancing the role of the
4 place of organic products in society.

5 As you may know FMI represents
6 grocery stores and food distributors in the
7 United States and also around the world. Large
8 grocery stores are some of our membership, but
9 fully three-quarters of our members are small
10 independent mom-and-pops and regional chains.

11 FMI has an organics committee, and
12 we are pleased that Bea James has served on
13 that committee. But it's a very diverse
14 group, and I think that reflects our
15 membership, the diversity of the retail
16 industry, and the diversity of the consumers
17 that our members serve.

18 For example on our committee we
19 have companies like Mustard Seed, Hannaford,
20 Sprouts Farmers Markets, Publix, Wild Berries
21 Markets, Lund's Whole Wheatery, Ukrops, New
22 Leaf Community Markets -- a read diversity.

1 And I think that reflects that
2 fact that consumers in a lot of different
3 segments, a lot of different markets, are
4 interested in organic products.

5 Our members do their best to
6 provide a safe, abundant, affordable, and
7 diverse food supply for their customers.
8 Organic food and products are an important
9 part of the mix. Although not every consumer
10 will prefer organic foods, they are important
11 and should be readily available to everyone,
12 even to those who maybe just want to pick up
13 a couple of organic tomatoes while they are
14 buying their toilet paper and all the rest of
15 their household goods.

16 Neither the Organic Food
17 Production Act nor the NOP regulations require
18 final retailers that only handle but do not
19 process agricultural commodities to be
20 certified if they want to have organic
21 products. That is, they can sell or package
22 organic products, and no certification is

1 required.

2 Nonetheless, the preamble to the
3 final rule expressly recognizes that retailers
4 may choose to be certified, specifically --
5 and I went back and pulled this out of the
6 preamble, quote: operations that qualify as
7 exempt or excluded operations can voluntarily
8 choose to be certified. So final retailers
9 under the statute and under the regulations
10 are excluded -- or exempt, rather -- from the
11 certification requirements if all they do is
12 handle but do not process. And final
13 retailers that choose to do some additional
14 types of activities are still considered
15 excluded, and certification is not required.

16 Therefore the issue on the table
17 really is what type of program is necessary to
18 ensure that retailers that voluntarily choose
19 to be certified can do so in a manner that is
20 consistent with OFPA.

21 More specifically the question is
22 whether a retailer that seeks to obtain a

1 voluntary certification must have all of its
2 stores certified or whether the retail entity
3 as a whole can be certified based on a multi-
4 site audit profile.

5 And I know from talking with Bea
6 James that this is an issue that you guys had
7 debated for awhile.

8 FMI respectfully suggests that
9 this establishes a false choice. You don't
10 need to choose one or the other. It doesn't
11 have to be either every store or a multi-site
12 audit system. Your recommendations could
13 encompass both.

14 We understand that NOSB has
15 already recognized the value of multi-state
16 audit, so there is no per se prohibition that
17 you guys see.

18 Moreover you guys have recognized
19 multi-state certification or multi-site audit
20 as a valid basis for establishing the organic
21 basis of producers, of entities that are
22 required to be certified under OFPA

1 specifically for farming communities.

2 If NOSB can accept use of multi-
3 site as permissible manner to ensure organic
4 standards are met for entities that are
5 required to be certified, certainly it should
6 be a possibility for entities that are doing
7 this voluntarily to also rely on multi-site
8 certification.

9 So the question then would be what
10 parameters do you need to support retailer
11 certification if they do it by having multi-
12 site rather than every site audits?

13 FMI supports and expects that
14 regulatory programs will be fair; that the
15 rules won't be rigged in order to preference
16 one type of entity over another; and that they
17 will be consistent. If you will permit this
18 type of regime as sufficient for farmers, then
19 it should also be so for retailers.

20 So we encourage you to carefully
21 consider this. Retailers can assist in
22 ensuring that more organic products are in

1 more consumers' homes, and we recommend that
2 you consider what types of parameters would
3 make a multi-site inspection service adequate
4 in your view.

5 Do you have any questions?

6 CHAIR MOYER: Any questions or
7 comments from the Board?

8 Thank you, Deborah, we appreciate
9 your time.

10 Joe Dickson and Timothy Kapsner on
11 deck.

12 Is Joe Dickson here?

13 Timothy? Is Timothy Kapsner here?

14 And then David Brauner on deck.

15 MR. KAPSNER: Hi, I'm Tim Kapsner
16 from Aveda Corporation which is a division of
17 Estee Lauder. And if you bear with me I'm
18 going to read my statement so I get it right.

19 I come here today speaking as a
20 scientist who has worked in the cosmetic
21 industry for over three decades. I've spent
22 many challenging and productive years

1 developing products and ingredients that come
2 from plant sources. Our industry can help
3 greatly promote the use of organic
4 agricultural materials by making highly
5 functional certified organic products with
6 plant-derived ingredients.

7 The definition of synthetic and
8 the concept of synthetic materials were
9 created in OFPA and the NOP as an input
10 screening tool. Ingredients and processing
11 aids used to make food products are classified
12 as being synthetic or non-synthetic to help
13 sort them to determine if and how they can be
14 used in organic agriculture or organic food
15 processing.

16 Food processing is described as
17 heating, baking, distilling and many other
18 physical processes. The concept of a process
19 resulting in a chemical change and thus
20 creating synthetic materials was not addressed
21 either in the law or in the rule. This has
22 created years of confusion and struggle to

1 reconcile the current certification and
2 approval system with what the law and the rule
3 actually say.

4 Examples of this confusion can be
5 found in current NOP national list. The
6 citric acid example discussed a few minutes
7 ago exemplifies this problem perfectly.

8 Another ingredient which
9 exemplifies this issue is ethyl acetate,
10 manufactured by combining grain alcohol and
11 vinegar in a way that causes a chemical
12 reaction called esterification. If someone
13 were to apply for a certification of an
14 organic product and describe it as a
15 combination of organic grain alcohol and
16 organic vinegar, the product could be
17 certified to the NOP. But if that ethyl
18 acetate is sold as an ingredient to a cosmetic
19 manufacturer it would be considered synthetic
20 as per the NOP definition and prohibited from
21 use in an NOP organic product.

22 This means that, dependent on

1 where in the process the rules are being
2 applied, a different answer will result.

3 There are many examples like this
4 in the cosmetic industry of products made by
5 chemical reactions that can be synthesized
6 within the constraints of the NOP. These
7 materials fit the definition of synthetic, and
8 therefore shouldn't be allowed as ingredients
9 in an NOP-certified organic cosmetic product.

10 Potential additions to an allowed
11 materials list are always evaluated in the
12 context of their intended use. Annotations
13 can be used to restrict the allowance to a
14 specific use, but a heavy dependence on
15 annotations makes the list difficult to
16 regulate.

17 However, minimizing or eliminating
18 annotations makes it more likely that a
19 material will be used in a way that was
20 clearly not the intent of its original
21 approval. This is a difficult balance within
22 a single industry such as foods. Adding a new

1 industry such as cosmetics to a food standard
2 will force this issue into territories that
3 the rule may not be prepared to handle.

4 Under the NOP the terms
5 ingredient, processing aid, substance and
6 adjuvant are confused and conflated. This has
7 made it impossible to distinguish
8 appropriately one from the other, and to treat
9 them distinctly depending on how they are
10 being used in a specific instance.

11 Materials such as sodium hydroxide
12 used to make soap combines with the oil and
13 that combination is changed chemically into a
14 new compound. In this process the sodium
15 hydroxide is used as an ingredient, not a
16 catalyst or a processing aid.

17 All of these issues, which are
18 central to the cosmetics industry, are being
19 handled quite well in all of the independent
20 cosmetic standards currently in development or
21 in use.

22 The NOP is currently considering

1 the development of organic standards for
2 several other industries, such as pet food and
3 aquaculture. At the same time the organic
4 food industry is struggling to address some of
5 the issues by the law that initiated it.

6 Living in a house while you are trying to fix
7 the foundation is difficult, but to do that
8 and try to add three additional stories on at
9 the same time is asking for trouble.

10 Expanding the application of the
11 NOP food standard to cosmetics should not be
12 done at this time.

13 Thank you for letting us speak.

14 CHAIR MOYER: Thank you, Tim,
15 those are great comments. We appreciate that.

16 Questions? Tracy?

17 MEMBER MIEDEMA: Just a real
18 quick one. Do you think it should be done
19 ever?

20 MR. KAPSNER: Well, on my
21 statement here at the very end, it originally
22 said, should not be done at this time or maybe

1 ever. But I cut that out. So I'd have to
2 say, I'm not sure. I think that the industry
3 should be allowed to continue the development
4 of its own standards, as the food industry
5 did. And if at some time the industry can
6 come up with standards that make sense, then
7 it may be time to regulate it. But that
8 hasn't happened yet.

9 CHAIR MOYER: Kevin and then Joe.

10 MEMBER ENGELBERT: What's your
11 thoughts on the problems that are going on
12 right now with consumer fraud in cosmetics and
13 personal care products, organic, that truly
14 are?

15 MR. KAPSNER: Well, that's the
16 whole thing we want to try and avoid. And
17 what I've been trying to do for 12 years now,
18 I've been trying to develop these standards
19 since 1997, is to create a standard that
20 people will get behind, people will recognize,
21 it would be on the label, that people would
22 look for, and that label would be in my mind

1 created by the cosmetic industry, and then
2 consumers could look for that label. The
3 process would be transparent. People could
4 trust that these means that these standards
5 had been through a process of industry
6 consensus. And then they can look for that
7 label, and the industry can help create some
8 weight behind something, so that all these
9 companies that are making unsubstantiated
10 organic claims would be -- would go away.

11 CHAIR MOYER: Joe.

12 MEMBER SMILLIE: Some of what I
13 wanted to ask was just answered. But Tim,
14 appreciate all the great work you've done for
15 the last 12 years and all the committees
16 you've served on. And I urge you to run for
17 the NOSB as a scientist and help guide
18 personal care products into this format.
19 Because unfortunately the organic food
20 industry did have that time to develop and
21 build our foundation on independent third
22 party certification, get the house ready, and

1 then when the time came to put the stories on,
2 we put them on, we put them on quick.

3 Unfortunately, and some of it may
4 be due to historical-cultural differences, you
5 don't have that time. It's a mess out there.
6 We all know it's a mess. And your solution of
7 letting industry define a standard and getting
8 consumers to get behind it, and I'll agree, we
9 kind of tried that in the food industry. And
10 we came to the conclusion that we needed
11 government to get in and get a regulation and
12 get consistency and conformity in the use of
13 the word, organic. And they've done that.

14 So unfortunately, I don't think
15 you've got the time to let the industry grow
16 on its own accord, because we are seeing label
17 claims out in the marketplace, and by
18 competing organizations. And they are not
19 going to say, oh, you're better than us; we'll
20 support you. They are going to hold onto
21 their turf. Companies are going to hold on to
22 their turf, and we need, like immediately I

1 think, a consistent standard for personal care
2 items, because consumers want it, and they
3 expect organic to mean organic. And that's
4 unfortunately the way I think it is.

5 But I urge you to bring all of the
6 knowledge which you have greatly contributed
7 to, especially your knowledge of synthetics
8 and how we can have good synthetic products,
9 and put it through the NOSB so that we can
10 help a good standard that you would be proud
11 of for consumers and for companies like yours.

12 MR. KAPSNER: I agree to a
13 certain extent, but the question still remains
14 as to whether the issues that I brought up
15 about the definition of synthetic -- I tried
16 in all of my standards, one of my first
17 objectives was to eliminate the use of the
18 word, synthetic. Just because it's a non-
19 issue, because synthesis means bringing two
20 things together and making something new, and
21 that goes for making babies and making bread
22 and creating new words in the English language

1 as well as making chemical compounds.

2 So if you are stuck with a food
3 world view of synthetic being something that
4 is bad, and something that has this definition
5 in the food world, that is going to give us a
6 different perspective than the cosmetic
7 industry has on what synthesis is.

8 MEMBER SMILLIE: I couldn't agree
9 with you more.

10 CHAIR MOYER: Brief followup.

11 MEMBER SMILLIE: Okay, brief
12 followup, I couldn't agree with you more.
13 That is what we are debating right now. We
14 are not against what you are saying. There is
15 a group trying to broaden that understanding
16 of what synthetic means, and we are right in
17 the middle of it. It's a perfect time.

18 CHAIR MOYER: Thank you, Joe.

19 Bea.

20 MEMBER JAMES: Just real quickly,
21 did you submit your comments to Valerie?

22 MR. KAPSNER: No, I have to do

1 that yet.

2 MEMBER JAMES: And I also was
3 hoping that Deborah White would be able to do
4 that as well.

5 MR. KAPSNER: In it's current
6 form it's barely readable. But I'll clean it
7 up and get it to her, electronically.

8 CHAIR MOYER: Thank you, Bea.

9 Any other Board members with
10 questions or comments?

11 Tim, we appreciate your time.
12 Thank you very much.

13 David Bronner, and Diana Kay on
14 deck.

15 MR. BRONNER: Thank you, Mr.
16 Chair. Thank you, NOSB Board.

17 This is a day I've been waiting
18 for for a long time. Actually I've had a
19 serious possibly of federal regulation in the
20 personal care space. As the CCAC document
21 notes it's a disaster. The term, organic, is
22 as meaningless as natural.

1 It was interesting, you guys were
2 talking about myrrh, and how you couldn't say
3 organic myrrh perfume because myrrh wasn't
4 organic, but even if the perfume itself was 95
5 percent and otherwise known as a product --
6 here we have such a ridiculous situation it's
7 beyond belief.

8 This is organic fair trade
9 certified cocoa butter body wash where the
10 only organic ingredient is the cocoa butter.
11 Everything else in this product is not
12 organic. It leads with water and sodium
13 sulfate, cacoaminopropyl hydroxysulfane,
14 glycerine, cocoa MEA, acolytes, copolymer and
15 then cocoa butter, organic cocoa butter. I
16 mean it's like way down. This product doesn't
17 meet -- it doesn't meet any private standard
18 in the world, regulation. There's not a
19 private standard this product complies with.

20 And because we don't have a single
21 standard, it enables companies that do not
22 comply with even the most permissive standard.

1 And that's what we have. It's not a question
2 OASIS or NSF. It's just like -- it's just a
3 mess out there.

4 And then in regards the intent --
5 I mean there is a certain basic set of
6 processes that everyone more or less agrees on
7 should be included -- not everyone, I should
8 say, there is a spectrum of opinion. But
9 insofar as there are additional processes not
10 currently allowed in the NOP, they are
11 understood to be processes that don't use
12 petrocarbon and use an inorganic reagent like
13 hydrogen or sulfur trioxide, or certain things
14 that if you don't get petrocarbon, you can use
15 it as organic agriculture material.

16 And the debate is, if you make
17 like sodium cacao sulfate, which is a well
18 described well understood process within
19 various industry efforts, is it -- can it be
20 an organic personal care product? Or should
21 it be restricted to a made-with-organic
22 personal care product?

1 And that is basically where we are
2 at. It's an irreconcilable difference. It is
3 not going to be solved by having competing
4 industry standards.

5 So basically the private standards
6 out there all have the same set of processes
7 give or take one; they have a similar set of
8 preservative allowances, and it's just a
9 category debate. Is it organic, or is it made
10 with organic?

11 And that is the situation, and
12 just allowing competing standards is not the
13 solution. And basically this decision needs
14 to be made. And insofar as soap, we make
15 soap, both 070 soap primarily, also 95 soap
16 products. We are willing to see soap come
17 down to 07. We don't want to see it be
18 wedged, allowing all kinds of synthetics,
19 having organic, certain cocoa sulfate shampoo.
20 I mean we are willing to see the chips fall.
21 But we do want to see a federal regulation and
22 just clean up the mess.

1 Thank you.

2 CHAIR MOYER: Thank you, David,
3 appreciate those comments.

4 Questions or comments from the
5 board? Tracy?

6 MEMBER MIEDEMA: So how, David,
7 would you answer the question about the lack
8 of say foundation that the prior commenter
9 made, in building these additional floors?
10 How do you see this actually feasibly
11 happening?

12 And that may be an unfair question
13 because you are not part of the program, but
14 from your perspective, how do you see
15 something like this going forward?

16 MR. BRONNER: The foundation has
17 been laid. I mean we all spent the last 10
18 years laying, okay, here is the set of
19 processes, additional processes we want and we
20 know what they are. And there is such a thing
21 as organic personal care that is not made with
22 organic. And the compromise that got worked

1 out in NSF is okay, when you start using green
2 chemistry and pulling apart ingredients,
3 putting them back together and all this stuff
4 that industry wants to do, well, there should
5 still be a distinction been an unhydrogenated
6 organic lotion where you are just -- organic
7 oil, organic cocoa oil and a natural
8 emulsifier versus a product that is
9 hydrogenating organic oil, that is making
10 ester products and doing XYZ chemical
11 processing, it's like, okay, well, that should
12 be a category distinction.

13 So we know what these processes
14 are. We know what green chemistry is. It's
15 all worked out. Is it organic or is it made
16 with organic? And a decision is easily made,
17 and that's right now what the fight is, is two
18 standards, and had the same processes, and one
19 is organic and one is made with organic.

20 MEMBER SMILLIE: Do you see it --

21 CHAIR MOYER: Go ahead.

22 MEMBER SMILLIE: Do you see it

1 possible that the OASIS work or the NSF work
2 could be dropped into 605(b)? Is it that
3 simple?

4 MR. BRONNER: Yes, I would say
5 that you could have an annotated list specific
6 to personal care. You'd list the conditional
7 processes, hydrogenation, sulfation, you know
8 the associated reagents, just like NSF
9 standard, annually released standards, have
10 been written.

11 And really, I mean Tim, myself, we
12 all worked real hard in generating this
13 foundation. And unfortunately things kind of
14 flamed out in the category debate.

15 But yes, I think it's pretty
16 straightforward to bring in regulation. And
17 these private standards are by like ECOCERT,
18 Soil Association, they are food certifiers.
19 And they are also making and certifying
20 cosmetic standards. There isn't this wide
21 gulf between the two, quote process standards,
22 and it's about additional process allowances.

1 And these ingredients are a little -- I mean
2 you have to kind of look at them as multi-
3 ingredient ingredients, like these that we are
4 talking about, like these processes like
5 sulfation, bring in sulfur trioxide and
6 attaching it to an organic fatty chain. So
7 there is an organic component, but it's an
8 inorganic.

9 So that's why --

10 MEMBER SMILLIE: The
11 calculations, are they going to be beyond
12 mathematical grasp?

13 MR. BRONNER: No, we addressed
14 that in NSF by just assigning values. Like
15 we say, okay, use this process, sulfation,
16 rather than say okay well, the molecular
17 weight difference is lower over acetyl fatty
18 acid chain is whatever, like you just say it's
19 going to count, contribute, if the sulfate of
20 fatty alcohol contributed 60 percent of its
21 weight to the product, we really went through
22 all this stuff over 10 years, like all these

1 issues were hashed out. And it's interesting
2 where I am. I'm in between the kind of
3 perspectives. Usually I'm not the pragmatist,
4 but in this case --

5 CHAIR MOYER: Okay, thank you
6 very much, David, appreciate your time.

7 In fairness to all the presenters,
8 I just should let the Board know that I have
9 20 names on my list, and we have one hour. So
10 I don't know how many are actually on this
11 list, Valerie, but let's just try to be as
12 expeditious as possible. I apologize for
13 that.

14 MS. FRANCES: There's been a few
15 adjustments.

16 CHAIR MOYER: Okay, thank you.
17 Dianna Kay and Sebastian.

18 MS. KAY: Hi. For anybody who
19 doesn't know me I am Diana Kay, and I
20 represent today our company Terressentials.
21 We are USDA-certified organic processor of
22 certified organic body care products.

1 I too have been in this industry
2 for 18 years, and I was a member of these
3 committees. And I'm going to kind of deviate
4 just a little from my written comments, which
5 I will leave here. But I feel after listening
6 to the two previous presenters that I must put
7 back in what I cut out. I hope you can all
8 hear me.

9 I have observed, and I speak for a
10 smaller part of the industry, not the
11 industry, and I'm going to articulate that.
12 Because one of the things that we saw, and
13 what we feel, not just opinionwise, is that
14 these committees were not balanced. I know
15 there was one submission that said this was a
16 balanced committee. And whether anybody wants
17 to hear it or not, it was not. Consumers were
18 not represented, and I'm going to disagree
19 with all of these people.

20 Just one example, this was an
21 ongoing argument. You cannot have a body care
22 product without chemical preservatives. This

1 is a book called Preservative Free and Self-
2 Preserving Cosmetics and Drugs: Principles and
3 Practices. It is available on Amazon.com,
4 and I'd say that if there is any chemist out
5 there who doesn't have this book and they are
6 making products for somebody, perhaps they
7 should invest and buy this book.

8 Okay, I've heard a whole lot of
9 stories about the surfactants and emulsifying
10 agents that can be used. We don't need these.
11 The industry -- the industry needs them
12 because it affects their bottom line. They
13 can use totally natural products that haven't
14 been processed, and we've proven that it can
15 be done. And they are choosing not to because
16 they need to have these inexpensive
17 ingredients that will last on a shelf for five
18 years.

19 That is why they want to use
20 hydrogenated materials, because once they
21 strip out of the oily component that can go
22 rancid -- and I think that is what we were

1 talking about with wheat germ oil, or wheat
2 germ, stabilizing it -- once you strip that
3 out, okay, then you have a product that is
4 left basically a wax, that would be alive
5 forever. And that is what they want.

6 Does that suit the consumer, and
7 what the consumers want as real organic? No,
8 it doesn't, and it doesn't need to happen. So
9 I'm here speaking for them.

10 But I also have a few other
11 points, so I'm going to kind of jump back with
12 some of those. And kind of try and talk back
13 and forth here. I hope you can all hear me.

14 We were pleased though to read
15 about the CACC's recommendation, I think it's
16 great. I do have one caveat with that, and
17 that is that I don't believe that there should
18 be a category of made-with-organic that
19 forgives body care companies from not being
20 certified. I think it has to go all the way,
21 just like it is for food. And here is why.
22 We have lip balm products that are products

1 that people eat. I know Julie is over there,
2 she has been supplying us for years with
3 certified organic materials, so she know where
4 the real deal is.

5 Medical creams, for mothers who
6 are breast feeding, this is a product that
7 babies will ingest. Do they need to have a
8 made with organic product that has
9 hydrogenated fat that a woman will rub on her
10 breast for her child to ingest? We could have
11 potential residues here of nanoparticle -- we
12 all know that there is a catalyst that is
13 involved. This is why hydrogenated products
14 are not approved under the NOP. We don't want
15 these kinds of things in our organic -- 100
16 percent organic or made with organic. We say,
17 go strict all the way. And let's bring
18 everything back home where it belongs to the
19 food standards. Because we have 100 products
20 right now, we've got 100 more right now
21 waiting to come out that don't involve the
22 synthesis that everyone else is talking about.

1 And these are products that our
2 customers are screaming for. They are
3 demanding it. They are writing us letters
4 telling us what they want.

5 I have to point out a couple of
6 things, thank you for the reminder. We also
7 agree with registration of stores and
8 certification, but I want to point out, I have
9 some handouts here, we are seeing the
10 proliferation of organic being used not just
11 on body care products but on stores. One of
12 the problems we are running into is organic
13 salons. If you google organic salon you will
14 be shocked to see what is coming up. We have
15 stores that are calling themselves organic
16 marketplace, organic this. Customers,
17 consumers, are going into these stores
18 believing that these stores are certified
19 stores selling these products. We really
20 would like to see the NOP come down on these
21 stores and make a major crackdown.

22 We also have website businesses

1 that are using the word, organic, and trying
2 to sell products that are not certified.

3 I agree, we need to take immediate
4 action, and I would like to see that now. So
5 that is the point that I wanted to make about
6 that. Try to rush through here.

7 CHAIR MOYER: Diana, I think
8 you've rush as much as you can rush. You
9 bring up great information. Valerie could you
10 get the name of that book for the Board before
11 we leave.

12 Other questions for Diana from the
13 Board?

14 MS. KAY: Not a single question?

15 CHAIR MOYER: It wasn't because
16 your presentation lacked information, I can
17 assure you.

18 MS. KAY: Unfortunately I didn't
19 get to all of it. But I will leave a copy for
20 you.

21 CHAIR MOYER: Okay, thank you
22 very much, Diana.

1 Sebastian.

2 MS. FRANCES: Please, there's
3 been a change in order.

4 CHAIR MOYER: Thank you, Valerie.
5 I didn't see that. Joanna Baumgartner on
6 deck.

7 MR. BELLE: Good evening, folks.
8 Sebastian Belle from Maine Aquaculture
9 Association. Thank you very much.

10 I'm going to be very brief.
11 You've had a long days as always. Our
12 association is a. producer association. We
13 represent both shell fish and fin fish
14 growers, about 147 farms in the state of
15 Maine; about 70-30 shell fish-fin fish is the
16 makeup of our association.

17 I'm also a member of the
18 aquaculture working group. And all I want to
19 do today is thank the livestock committee for
20 their willingness to consider our input in
21 trying to address their concerns. We really
22 appreciate it from the AWG's point of view

1 that you were willing to listen to our
2 suggestions.

3 I want to also communicate
4 greetings from George Lockwood. He says hello
5 to everybody. He couldn't come here. But I
6 do think our response to your concerns was
7 kind of a sincere effort to try and solve some
8 of your concerns.

9 A couple of responses are quite
10 technical, and so I would just ask if the
11 livestock committee in your deliberations has
12 questions, please don't hesitate to reach out
13 to us and use us as a resource, and we are
14 more than willing to explain, and particularly
15 the hydrologic zone of influence, that gets
16 kind of funky when you really delve into it.
17 But it is a very important piece I think of
18 our response. So we'd be glad to explain that
19 further.

20 And finally we really hope that
21 you as a committee continue to use us as a
22 resource, and continue to have a dialogue as

1 you go forward in your deliberations, because
2 we think it's a positive way to do things.

3 Thanks very much for your efforts,
4 and thank everybody on the Board, for your
5 efforts, because you've had a long day, and
6 you've put a lot of time and effort in.

7 CHAIR MOYER: Thank you,
8 Sebastian. I believe we may have some
9 questions for you. Question from Jennifer?

10 MEMBER HALL: Yes, Sebastian, I
11 just have one question. And I do appreciate
12 all the diligence, and you bring up a good
13 point about the hydrologic zone of influence,
14 and the details that are involved in that.

15 Is it realistic to think all those
16 things are measurable, that a certifier can
17 use those tools in real life?

18 MR. BELLE: We had a lot of
19 discussion about that, and we actually reached
20 outside the group to a bunch of physical
21 oceanographical modelers, and asked them
22 specifically is what we are proposing crazy?

1 Is it achievable? If it is achievable, how
2 would you then check that it had been
3 achieved, and how would a certifier approach
4 that?

5 So we had a lot of debate, and we
6 reached out to, there was one modeler up in
7 our neck of the woods, in the northeast who is
8 really a world renowned oceanographic modeler,
9 we'd be glad to give you their names directly.
10 You can have your own discussion directly with
11 them. And then we also had a West Coast
12 modeler.

13 And the answer we got back
14 basically was, our first try was a good try
15 but it was technically flawed in a couple of
16 ways. And so we adjusted it before we
17 submitted our comments. And they both said
18 that particularly the zone of influence stuff
19 is difficult but it is achievable, and it's
20 also something that because it is quantitative
21 and you have a lot of data there, that a
22 certifier could go in and audit that, the

1 results of that process, and verify that in
2 fact what you are asserting as a producer you
3 had actually achieved. So that is the short
4 answer.

5 CHAIR MOYER: Follow up,
6 Jennifer?

7 MEMBER HALL: Yes, not directly.
8 But I do want to reiterate, if there is any
9 way that the AWG can encourage applicants to
10 the Board that I think that would be a good
11 idea.

12 CHAIR MOYER: Okay. One more
13 question that I have for you, Sebastian, in
14 two minutes or less. We continuously get
15 stuck on bivalves with the whole concept of
16 the fact that we are not feeding them, they
17 eat what washes by. Can you convince this
18 Board that that, how can we get around that
19 issue? It's the biggest stumbling block for
20 us. You and the rest of the AWG have done an
21 excellent job in your rebuttal, but that thing
22 just keeps hitting us flesh in the face.

1 MR. BELLE: Not surprisingly, we
2 struggled a lot with that. And there are a
3 lot of people in the traditional shellfish
4 community who frankly are just mystified by
5 that concern.

6 And we took, certainly those of us
7 who represent growers frankly took a lot of --
8 from our members about even suggesting that
9 what they were doing wasn't organic and
10 perfect in some way.

11 The hydrologic zone of influence
12 was part of the response to that concern.
13 Basically what we did was, we did not want to
14 -- we had a lot of discussion about whether or
15 not we should go kind of the product testing
16 route. And we recognize that within the
17 organic community that's something that people
18 are very uncomfortable with. And it's really
19 a process certification as opposed to a
20 product certification. So we tried to kind of
21 combine those approaches.

22 And the purpose of the hydrologic

1 zone of influence is basically to document all
2 the possible sources of contaminants that
3 would impact the feed that those bivalves are
4 consuming, and then to include in that a
5 routine testing of those feed sources. So
6 that although we are not testing the finished
7 product, we are actually testing the feed
8 sources and then using sentinel animals as
9 kind of if you will a fence around the farm.
10 So that is how we approached it.

11 I recognize that it is not
12 perfect. We are not culturing the algae
13 organically that we are feeding to the
14 animals. We do have provisions in the
15 proposal to allow for that kind of shellfish
16 operation to occur on land and do that, so
17 there is an ability to do that. But the
18 reality is that land-based aquaculture is
19 extremely capital intensive, and to suggest
20 that a small owner-operator is going to build
21 a land-based farm and then culture algae and
22 feed them algae is probably unrealistic from

1 a reality point of view.

2 CHAIR MOYER: Dan.

3 MEMBER GIACOMINI: Hi Sebastian,
4 there was a couple of comments questioning
5 your, what you were just talking about of
6 surveying that possible contaminants. They
7 were basically saying there is no way you can
8 get far enough up the watershed. What do you
9 project in there specifically?

10 MR. BELLE: Yes, what we did was,
11 in that circumstance we reached out to actual
12 feeding rate experts on bivalves, and
13 phytoplankton culture experts. And we said,
14 given these parameters from a temperature
15 point of view, what is the lifespan of a
16 single celled algae phytoplankton and what is
17 the feeding rate for a bivalve?

18 And then we looked at flow rates,
19 and went back to our oceanographic modelers
20 and said, well, what we've been told by the
21 phytoplankton experts and from the feeding
22 rate experts is that phytoplankton under this

1 set of temperature regimes lives and basically
2 divides at this rate. So how far away do we
3 have to go given the flushing rates?

4 And so obviously it is dependent
5 on temperature and flushing rates and the
6 lifespan of the phytoplankton that you are
7 concerned about. And so that is why in the
8 hydrographic zone you actually have to come up
9 with -- you have to define based on those
10 parameters how far away from the farm you have
11 to go in order to predict whether or not a
12 phytoplankton has been exposed to something.
13 And there is a margin of safety in there as
14 well. So you go further than that zone of
15 influence.

16 CHAIR MOYER: Thank you,
17 Sebastian. I think I speak for the entire
18 board, and certainly the livestock committee,
19 when I say we look forward to participating in
20 these conversations as we move forward over
21 the next few months.

22 MR. BELLE: Well, thank you very

1 much for your time.

2 CHAIR MOYER: Thank you for your
3 time and for being here.

4 Joanna, and then I don't have the
5 list up there, but is it Michael Henson?
6 Well, let's just leave it at that. Thank you.

7 MS. BAUMGARTNER: Okay, thank
8 you.

9 SECRETARY WEISMAN: Is this with
10 a proxy or as a proxy?

11 CHAIR MOYER: This is as a proxy.
12 Five minutes.

13 MS. BAUMGARTNER: Yes, but I'm
14 going to make it shorter.

15 CHAIR MOYER: Thank you. The
16 Board appreciates that.

17 MS. FRANCES: She has a proxy
18 from Sam Earnshaw, Community Alliance with
19 Family Farmers, and then someone moved and
20 traded places with her so she could go sooner
21 so she could leave.

22 CHAIR MOYER: Thank you.

1 MS. BAUMGARTNER: Yes. So of
2 course I'm up here to encourage you to fully
3 support and adopt the biodiversity
4 conservation recommendation.

5 It's been since 2002 that we began
6 working on this issue with a broad community
7 of certifiers and inspectors and
8 conservationists. So there is lots of
9 materials out there. There's these guys that
10 we worked on with folks. We heard from
11 certifiers that they actually wanted
12 noncompliance spelled out, so we came up with
13 this guide with Lynn Cody's help and she
14 brought this to you last year.

15 I passed this around to you also.

16 So this is the summary of the 12 major
17 noncompliances. And this page shows the most
18 egregious instances that would warrant
19 certifiers' actions, the one that could give
20 the organic community a black eye.

21 They probably rarely occurred. In
22 most cases of noncompliance certifiers can

1 notify their farmers that they need to fix
2 problems within a given time and they will do
3 so, and their certification will not be
4 revoked.

5 The rest of this guide, minus that
6 one page, is -- has 20 pages of compliances
7 that farmers can do that help certifiers
8 understand all the thing that do work for
9 biodiversity conservation.

10 ATTRA, which holds the model
11 organic inspection questions that the NOSB
12 approved in 2005 on their website, they have
13 recently created an OSP that has those
14 questions answered. And this is it. Next
15 slide.

16 I wanted to point out that the way
17 those questions, they are model questions
18 certifiers, don't have to use them, but some
19 certifiers are. The way that it is set up is
20 that it starts with natural resources, and
21 then subsequently there are different sections
22 of biodiversity, biodiversity management for

1 whole farm issues. For uncultivated areas,
2 for cropland area biodiversity. Next.

3 When livestock are involved.

4 Next. And when wild crop harvesting
5 enterprises are involved.

6 They have also created this
7 wannabe organic farms plan, and so it's just
8 an example, but it helps farmers understand
9 what they can do. And so like here they say,
10 we are going to deal with invasive species.
11 We are going to plant beneficial insect
12 refuges. We are going to plant some native
13 vegetation buffers on two sides of the farm.
14 And we are going to put up a bat box.

15 So but not only does ATTRA have
16 this on their website, Rodale Institute also
17 does. And there's going to be two other
18 documents like this. This one is for small
19 farmers. There is going to be one for large
20 field crop farmers, and then one for
21 livestock.

22 So I just want to end saying that

1 we encourage you to approve this
2 recommendation, and I think it will do a lot
3 for organic farming.

4 Thank you.

5 CHAIR MOYER: Thank you, Joanna.

6 Any questions for Joanna or
7 comments from the Board?

8 Thank you. We appreciate your
9 time. I will mention as the next presenter
10 comes up to the Board that we do have a series
11 of taxicabs for Board members that will be
12 waiting out front at 7:00 o'clock. But we
13 have to pack up and get out of this room and
14 get there so we can go en masse down to the
15 Witten Building and we will do that.

16 Michael. Do I have the correct
17 person? Dag. I'm sorry, Dag Falck.

18 MR. FALCK: Thank you. It's Dag
19 Falck. Thank you very much for taking the
20 time to take our comments and it's very
21 interesting watching the process here from
22 Canada.

1 We are doing very similar things
2 to what you are doing, but you are way ahead
3 of us, so we are learning so much, so you
4 better be careful because we might catch up.

5 I am bringing comments from
6 Nature's Path. I work for Nature's Path. We
7 are the largest certified organic cereal
8 producer in North America. And it's a bigger
9 issue, when you get bogged down with all the
10 details that I see you are working with,
11 similar to what we are working with in Canada,
12 you can lose sight of the bigger issues
13 sometimes. But they also are important
14 because they can overtake you.

15 And for us what we want to bring
16 to your attention is natural claims infringing
17 on the organic market. And we found that
18 misleading and unverified marketing claims
19 that may imply organic method productions are
20 used, these claims are being seen more and
21 more in the marketplace, and many consumers
22 are confused between natural and organic.

1 With some of these Natural Brands
2 communications we see claims that imply
3 organic production to the natural sphere. We
4 actually have evidence of one of the brands
5 stating on their website, natural foods are
6 foods without pesticides or artificial
7 additives, as well as minimally processed and
8 preservative free.

9 So as an industry we have -- and
10 we must -- go to great efforts to educate the
11 consumer about what organic production and
12 processing means, and why consumers can trust
13 the organic label.

14 And our comment to the NOSB is to
15 ask for a task force or a committee or
16 whatever structure you want to be working with
17 with a mandate to prepare a recommendation to
18 the USDA NOP to protect this certified organic
19 label in the marketplace, specifically by
20 defining natural for all product categories
21 that are currently covered by the NOP, and to
22 establish and pass a natural labels claims act

1 or regulation, not just a policy with no
2 enforcement authority. Because that's what
3 we've got right now. We've got a situation
4 where there is no definition out there. The
5 most common definition referred to dates back
6 to 1982, to relate to natural, and it's called
7 -- it's written in policy memo #0055, natural
8 claims. But it only applies to meats and
9 poultry, and it's also very weak in its
10 definition.

11 So there have been many many
12 comments given over the years saying that this
13 is a serious issue, that we need to have a
14 definition for natural, so that people are
15 wanting to claim natural, they know what the
16 guidelines are so their consumers will also be
17 happier knowing what it is, and also it won't
18 be infringing on what we have worked so hard
19 to create.

20 I've looked through the national
21 grant programs regulatory assessment, and the
22 -- picked up some of the language there for

1 why the NOP was originally developed, and
2 organically produced food cannot be
3 distinguished visually from conventional food,
4 and cannot necessarily be distinguished by
5 taste. Therefore consumers must rely on
6 labels and other advertising tools for product
7 information.

8 However consumers face -- I'm
9 jumping around a little bit here -- consumers
10 face difficulties in discerning the organic
11 attributes of a product, and many producers
12 and handlers have sought third party
13 certification of organic claims. So part of
14 the reason that brought us to where we are
15 today was to clarify the confusion in the
16 marketplace.

17 And in the benefits of the final
18 rule, also from the regulatory assessment, one
19 of the points is providing a common set of
20 definitions and organic attributes. So this
21 idea of organic attributes I feel the natural
22 confusion is kind of infringing in on the

1 organic attributes saying that things are done
2 organically -- they don't use the word
3 organic, but they use all the words, like no
4 pesticides, no fertilizer, no this and no
5 that. And they can't be verified, and they
6 can't be -- we can't take anybody to task for
7 it and say, hey, that's not right, because
8 there is no common definition.

9 So to summarize, the lack of a
10 clear guidance and a binding regulation or act
11 to enforce consistent labeling in the
12 marketplace that does not infringe on lawful
13 certified organic claims has been brought up
14 for many years by many different parties in
15 the organic industry, even companies marketing
16 natural but not organic products have asked
17 for clear guidance to help the consumer to
18 select products that are what they say they
19 are.

20 We feel that it is time for this
21 issue to be thoroughly addressed before it
22 threatens the success of organic products.

1 And we particularly saw the evidence of this
2 in the marketplace that we're in with the
3 recent recession. A lot of companies took
4 more advantage of this confusion, and actually
5 kind of manufactured confusion to their
6 advantage. So and I will hand you a copy of
7 that. Thank you.

8 CHAIR MOYER: Thank you, Dag. We
9 have a couple of comments or questions.

10 Bea and then Katrina.

11 MEMBER JAMES: Thank you for
12 bringing that up. I recognize that that is
13 absolutely an issue in the marketplace, the
14 distinction between natural and organic. I
15 guess my question to you would be, how would
16 you envision merging that definition between
17 the conventional market and the natural
18 market? It's such a huge request that you
19 ask, and this Board's focus is really on
20 organic, and we are still grappling with
21 trying to define that.

22 MR. FALCK: Yes, I mean that is

1 the big question is how are the mechanics
2 going to work on this. But first of all we
3 want to bring up the importance of the issue.
4 And then some of the solutions might include
5 the NOP working within other government
6 departments to request that we need this, not
7 that the NOP is responsible for developing it,
8 because it is outside the organic -- it has
9 nothing to do with organic, and that's the
10 point. So but where organic is being
11 infringed on, and since the NOP is here to
12 protect organic trade and to clear up
13 confusion in the consumer, well, that
14 confusion that we originally clarified by
15 having the organic claim being verified and
16 all that, well, that confusion is now re-
17 happening. But it is not re-happening with
18 conventional; it's re-happening with natural.

19 MEMBER HEINZE: You covered most
20 of it. While I am sympathetic to your
21 comments, I just wanted to make sure that
22 everyone knew that natural is clearly under

1 the FDA jurisdiction, and is actively being
2 worked on.

3 MR. FALCK: Okay, any more
4 questions?

5 Okay, thank you very much.

6 CHAIR MOYER: Thank you. I
7 believe Jay Hanson is next, Jaydee Hanson, I
8 apologize. And Kathy Jo Wetter is on deck.

9 MR. HANSON: Well, good
10 afternoon, or good evening, whichever we're at
11 now. Thank you for your long service on this
12 committee today and all the other days you
13 work on.

14 The Center for Food Safety which I
15 am representing both on behalf of myself, on
16 behalf of George Kimbrell, our senior
17 attorney, is a nonprofit membership
18 organization that works to protect human
19 health and the environment by curbing the
20 proliferation of harmful food production
21 technologies, and promoting organic and other
22 forms of sustainable agriculture.

1 We have about 40,000 members
2 around the country, and some in Canada. With
3 our sister organization, the International
4 Center for Technology Assessment, we've worked
5 on the issue of nanotechnology for some time.

6 The International Center for
7 Technology Assessment works primarily on new
8 technologies and trying to assess them to see
9 how they benefit or don't benefit the public.
10 We have a particular project on nanotechnology
11 called Nanoaction, through which we coordinate
12 campaigns and represent our members.

13 You have I hope enough of you, I
14 hope there are enough copies, to have a copy
15 of principles for the oversight of
16 nanotechnologies and nanomaterials. This
17 document has now been endorsed by over 80
18 organizations on six continents. If you'd
19 like it in Spanish, French, German, Japanese
20 or Chinese, it is now available on the
21 Nanoaction website.

22 We have also been together with

1 International Center for Technology
2 Assessment, the lead organization, filing two
3 legal petitions, one with the FDA in 2006, and
4 one with the EPA in 2008. Our petitions
5 request those agencies to use their existing
6 authorities to address issues created by the
7 rapid commercialization of nanotechnologies in
8 various sectors.

9 We -- one of the products you've
10 talked about some here today is the subject of
11 the petition to the EPA. And that is
12 nanosilver as a antimicrobial agent. A little
13 parenthetical comment: we will probably submit
14 to you later some more comments on synthetic
15 and your definition of synthetic.

16 A couple of things that I think
17 are going to become more and more problematic
18 with nanotechnology, one is percentages.
19 Nanotechnology may be an extremely small
20 percentage of a product, but because of the
21 activity that is enabled through
22 nanotechnology may have a greater effect on

1 the product than the volume, and volume
2 challenges I think will come up. But we will
3 talk some more about that later. You all have
4 our 10-page long comments, so I'm not going to
5 go through them.

6 But in summary, we believe that
7 nanotechnology is contrary to organic
8 principles. Nanotechnology will further
9 entrench an industrial chemical agriculture
10 and industrial foods as dominant paradigms to
11 the detriment of public health and the
12 environment, and as such we think that
13 nanotechnology is antithetical to organic
14 principles and should be prohibited from the
15 USDA organic standard.

16 We think that because
17 nanotechnology involves the manipulation of
18 materials and creation of structures and
19 systems at the scale of atoms and molecules,
20 the mere fact that a larger scale version of
21 material is a permitted substance -- do I have
22 one minute, or do I have both of the five

1 minutes? Okay.

2 We think the mere fact that the
3 larger scale is permitted doesn't mean the
4 nanoscale should be permitted. Intentionally
5 created nanomaterials are novel, frequently
6 patented substances that have the capacity to
7 be fundamentally different in ways the
8 scientific community has not fully understood.

9 As such engineered and
10 manufactured nanomaterials should be defined
11 as synthetic and prohibited substances, and
12 should be presumed excluded.

13 One of my mentors was a man named
14 Harrison Brown who was the geochemist for the
15 Manhattan Project, and the man who first
16 discovered how to isolate plutonium. Harrison
17 Brown would turn over in his grave listening
18 to some of the discussions of nanotechnology.

19 You will hear people say, well,
20 nanotechnology is all around you; you
21 shouldn't worry about it. Harrison would say,
22 yes, radiation is all around you. That

1 doesn't mean you shouldn't worry about it.

2 There are going to be processes
3 that create incidentally nanomaterials. What
4 we are talking about is intentionally created
5 nanoparticles and nano materials, and that's
6 really what we think you have before you.

7 The time to act, we think, is now.
8 Nanotechnology is being rapidly
9 commercialized. The U.S. government and other
10 governments are putting lots of money into it.
11 Very little money is going to the health and
12 safety aspects of it.

13 The standard for the size of nano
14 particles I think is going to be an important
15 element. I've recommended to a committee in
16 the state legislature of California that they
17 actually use 300 nanometers, not the 200
18 nanometers that the soil association uses, or
19 the 100 nanometers that the National
20 Nanotechnology Initiative uses. I believe the
21 key issue is, does the changed substance have
22 properties that change how it worked

1 chemically and how it worked physically. Has
2 its quantum physics changed? Has its optics
3 changed? Those questions are going to be
4 important.

5 That being said our organization
6 does support the Soil Association of the UK's
7 standard in 2007. I -- try to very quickly
8 not run out of time -- we've answered all of
9 your questions. And in general you should
10 understand that we don't think nano belongs in
11 organic.

12 We have pages and pages of
13 scientific argument that we will be happy to
14 provide you. And our petitions to the FDA,
15 and our petitions to the EPA, could help you
16 unpack that.

17 I would also be happy to give you
18 the comments that I have passed on to a
19 committee in California. Those are J.D.
20 Hanson's comments, not the comments of the
21 Center for Food Safety at this point. And I
22 thank you.

1 CHAIR MOYER: Thank you, Jaydee.
2 We appreciate those comments, and the time you
3 spent bringing that information to us. And
4 anything you can pass on to the program, they
5 will make sure that the materials committee
6 gets that, and we will review that and include
7 it in our thought process.

8 MR. HANSON: Please note in our
9 written comments we have made page by page
10 comments sometimes on your discussion draft
11 where we have some questions on that. I know
12 it's late, and you are tired and everybody
13 else is, so I'll stop now, and thank you very
14 much.

15 CHAIR MOYER: Any questions or
16 comments for Jaydee? Again, we appreciate
17 your time coming to us today and bringing that
18 information.

19 MR. HANSON: One last thing: I
20 chair, or I'm the U.S. co-chair for the Trans-
21 Atlantic Consumers Dialog Committee on
22 Nanotechnology, and through that I've had a

1 chance to interact with a number of the
2 European groups. And I assume you have on
3 your radar screen that the European Commission
4 is dealing with two things related to nano, a
5 nano cosmetics directive is coming out fairly
6 soon, it's almost finalized. I believe it's
7 got one more reading in the European
8 Parliament. That will be requiring labeling.

9 Likewise there is a nano food
10 directive that is going to come out by the end
11 of the year, that will also require labeling
12 of nano substances. So you have the
13 possibility if you don't exclude nano from
14 organic products here, that you will have
15 organic products, in order to be sold in
16 Europe, that will have to be labeled. And I
17 think that is going to raise confusion on the
18 part of people here.

19 Thank you.

20 CHAIR MOYER: Okay, thank you
21 very much, Jaydee. Appreciate that.

22 Kathy Jo Wetter, and then Valerie,

1 if you can tell me who's next, Urvashi Rangan,
2 that's who's next. Thank you very much.

3 No Kathy Jo? Or Urvashi? And
4 then John Foster. Is John here? He left?

5 MS. RANGAN: Good evening. I'm
6 speaking for Michael Hanson and myself. We
7 are both from Consumers Union, and I'm going
8 to try and make it fast.

9 Good evening, my name is Urvashi
10 Rangan. I am just recently director of
11 technical policy in the technical department
12 for Consumers Union. We publish Consumer
13 Reports magazine.

14 I'm here to hit a lot of topics,
15 so let me just get started.

16 The first is nanotechnology, and
17 there's been a lot of discussion. We don't
18 agree it's compatible with organic systems.
19 Here's where I think a line could be drawn,
20 which is in the intentional manufacturing of
21 nano-engineered materials for use in organic
22 production. I think if you can draw that line

1 there, it will then forgive the nano particles
2 generated in homogenization and other
3 production methods that are currently in use
4 while prohibiting the intentional
5 manufacturing of nano materials for use in
6 organic production. I think that is one way
7 at least to get around this.

8 One thing this does bring up,
9 though, is the generation of nano particles
10 from physical methods, so you can grind
11 something and pulverize it until you get a
12 nano particle. And I think we would regard
13 that as a chemical biophysical change to that
14 particle. And that plays into the synthetics
15 definition as well. So it needs to be tracked
16 all the way through.

17 We think that that method used to
18 generate a nano material ought to be
19 prohibited so that you can't grind silver into
20 nanosilver, or titanium into nanotitanium, and
21 use it in organic products.

22 But I think if we can phrase this

1 and draw the line at intention to manufacture,
2 that may be one way to at least get this beast
3 off the deck and start at least drawing the
4 lines in the sand as to where it is
5 prohibited, and in the case of homogenization,
6 where it would just be acceptable.

7 With genetically engineered
8 vaccines, that came up. We generally believe
9 that genetic engineering doesn't play a role
10 in organic production. And we understand, in
11 my conversations with Harriet, that there may
12 be a part in the regulations that requires, at
13 the very least, a review of vaccines that may
14 be genetically modified, just like a synthetic
15 material.

16 At the very least that requirement
17 should be enforced. But we think actually the
18 Board ought to consider full prohibition on
19 genetically engineered vaccines. It's a
20 prohibited method, consumers don't expect
21 anything used in organic production to contain
22 genetic engineering. And that will be a very

1 complicated education task going forward as
2 this bubbles to the surface.

3 Definition of synthetic materials:

4 we were really pleased to see the presentation
5 that went up based on Rosie Koenig's original
6 draft of what synthetic is and what it isn't.
7 We do not agree, we strongly disagree with the
8 previous comments that the OFPA should be
9 opened up; that synthetic materials should
10 just be limited to petrochemical-derived
11 compounds. That is simply completely out of
12 line with consumer expectations and with
13 science. Whether it's in a personal care
14 product or whether it's in food, a synthetic
15 substance is a synthetic substance. You can
16 pull it out of a coconut, and if you
17 chemically process it into something and you
18 change the chemical nature, that is a
19 synthetic ingredient. And that is the
20 scientific basis of that; that's chemistry
21 101. So to futz with that constantly in these
22 conversations is really to do a disservice to

1 the organic program. And a change like that
2 would really undermine the integrity of what
3 organic has come to be. So we strongly
4 disagree with that, and we are quite
5 supportive of the document that was presented
6 today by the working group. We would just
7 encourage you to look at the pulverization and
8 the generation of nano materials within that
9 document as well.

10 On personal care products,
11 fascinating discussion today. We also believe
12 that that product class has to come in line
13 with food for all the labeling tiers, not just
14 for one or two of them, for all of them; and
15 that means creation of sections on the
16 national list that will deal with the
17 synthetic materials that are used in the non-
18 organic portion of those products.

19 There are a lot of examples for
20 why you should do this. I'm going to submit
21 the written comments to Valerie, including
22 thallates and fragrances, though, and that

1 even means for your organic tier. You've got
2 a fragrance, you've got thallates in it. That
3 could be used under the 5 percent portion.
4 Same with the made-with organic ingredients.
5 Consumers are looking to these products so
6 they can mitigate their exposure to some of
7 these harmful chemicals that are on the
8 market, whether it's parabens, whether it's
9 thallates, whether it's EDTA, and whether it's
10 even a synthetic ingredient that is derived
11 from a natural material. There are plenty of
12 synthetic substances that come from coconuts
13 that are highly irritating in personal care
14 products. We think those materials ought to
15 be reviewed by this Board and listed one way
16 or the other, or simply not used at all,
17 because that's what a synthetic material is.
18 That's what the job of this Board is to do.
19 And we don't want to see any non-organic
20 portion of any product category be able to
21 sort of be a Wild Wild West of ingredients.
22 So I'll leave my comments on

1 personal care products at that.

2 I will also just say that the FDA
3 does not require any pre-market approval of
4 cosmetics. So while you are looking to FDA
5 for some guidances, they don't have a very
6 good track on personal care products, in
7 addition to the labeling problems that someone
8 brought up, that Nature's Path brought up for
9 food, those same problems exist for personal
10 care products. Hypoallergenic, fragrance
11 free, natural -- all don't mean anything on
12 that product category. They all fall under
13 the jurisdiction of FDA.

14 So it's something for this Board
15 to keep in mind. Because if organic is going
16 to mean something more, then it shouldn't be
17 diluted by those other claims that are
18 currently out there.

19 Biodiversity, we strongly support
20 that biodiversity document. We think,
21 however, a line needs to be added in 205.200,
22 and that production practices dot dot dot must

1 be able to demonstrate that they maintain or
2 improve the natural resources of the operation
3 including soil and water quality. If you
4 can't demonstrate it, there should be not a
5 not-applicable section, a not-applicable box.
6 We think that these principles ought to apply
7 to all production systems that come under the
8 national organic program.

9 We also think biodiversity should
10 be included in the checklist for the
11 accreditation process so that all certifiers
12 are aware of the requirement and deemed as
13 having the expertise and competence to verify
14 it.

15 We really do applaud, though, that
16 document as being a progression of the organic
17 standard, and really serves the organic
18 marketplace very well.

19 As new products are added to the
20 scope, however, that document is going to need
21 to be updated. And I can't get away without
22 talking about aquaculture. If you look at

1 open net pens, and you start to read the
2 biodiversity document, those two things don't
3 fall in line with one another, and neither
4 does the bivalve recommendation at this point.

5 So if we are moving toward
6 aquaculture at some point those -- we believe
7 the biodiversity document needs to be
8 augmented to also include production practices
9 that go on in aquaculture, and whether or not
10 they are really compatible with organic
11 production.

12 On animal welfare, we again
13 commend this board for putting out an animal
14 welfare document; it's been a long time
15 coming. Consumers really expect that this
16 program is taking animal welfare issues
17 seriously, and we would just agree with the
18 comments made by Patty Lavera from Food and
19 Water Watch and many others that there is more
20 to it than just that. And while we are really
21 pleased that Temple Grandin's input was
22 accepted and put into this, Temple Grandin has

1 actually participated in the development of
2 several animal welfare standards, many of
3 which have much more robust standards than
4 this particular discussion document contains
5 right now. And we would really encourage you
6 to look at the programs that are out there,
7 certified humane, whole foods animal welfare
8 standards. There are many programs out there
9 right now that have space requirements,
10 density requirements, animal treatment
11 standards regarding tail docking and de-
12 beaking. We think those things have to be
13 considered, and we want this Board to use
14 what's out there as a base for your
15 deliberations around that topic.

16 Finally on retailer certification,
17 we strongly support retailer certification for
18 organic. There are so many confusing things
19 when consumers get to the store, and it is a
20 way for stores to differentiate themselves,
21 and we also agree that there is a lot of
22 natural organic commingling at the retail

1 stores that really does need to be dealt with.

2 I'm not sure based on the last
3 comment that you all can take on natural and
4 agree that that is something that has got to
5 be dealt with at a higher level than this
6 agency. But that is an important part of
7 distinguishing organic from natural in the
8 marketplace, and something we work on all the
9 time in trying to educate consumers around
10 that topic.

11 And finally, I would just maybe
12 urge that you might consider what retailers
13 should not be using the organic label. I also
14 have seen organic dry cleaning, organic lawn
15 care services. And this is a real problem.
16 We get questions all the time from consumers
17 about the variety of retailers offering
18 organic services. If they don't meet an NOP
19 program, we just think they shouldn't be
20 allowed to use that term. And again, we
21 encourage this Board and the national organic
22 program to stop the allowance of people using

1 the organic claim whether it's on fish today,
2 dry cleaning tomorrow. It shouldn't be out
3 there. It mucks up the marketplace.

4 Thank you.

5 CHAIR MOYER: Thank you, Urvashi.

6 Any questions or comments? Hugh?

7 MEMBER KARREMAN: Just a quick
8 comment, Urvashi, on the animal welfare. We
9 are definitely going to be taking a lot of
10 input. We just wanted to get something out
11 there to start the conversation.

12 MS. RANGAN: And we are glad it's
13 out there, thank you.

14 CHAIR MOYER: Kevin.

15 MEMBER ENGELBERT: We'd also
16 appreciate some specific comments with regard
17 to the biodiversity document and the
18 aquaculture issues we are working on.

19 MS. RANGAN: For the language
20 changes, Kevin, that I recommended, I have it
21 here in the written document. Thanks.

22 CHAIR MOYER: Any other questions

1 or comments? Thank you, Urvashi. Appreciate
2 your time very much.

3 Next we have Bill Wolf and then
4 Kelly Schea on deck.

5 Bill.

6 MR. WOLF: Hi. You guys have had
7 a long day. I want to give you a gift. I use
8 it pretty regularly. My staff tells me that
9 it actually has helped a lot, and they have
10 thanked the manufacturer or the producer of it
11 for improving my mood in the office
12 periodically. But that is not what I was
13 going to talk about.

14 We submitted, Wolf, DiMatteo and
15 Associates submitted written comments to you
16 about a number of items: removal of lecithin
17 from the national list, inert atmospheric
18 gases, the sunset of materials, biodiversity,
19 list for inerts, clarification of definitions
20 of the national list.

21 Today I really want to talk very
22 briefly about -- kind of an umbrella concept

1 that you all face in some of your decision
2 making, and some of my personal experiences
3 around that. And before I do I want to
4 introduce Oliver the earthworm. Oliver was
5 introduced to me by -- actually by Jeff when
6 he brought 10 yards of compost to the people's
7 garden in D.C., and I had the pleasure of
8 helping to shovel some of it into wheelbarrows
9 with Valerie, and we --

10 CHAIR MOYER: I was wondering
11 where Oliver got to, so thank you.

12 MR. WOLF: He is being cared for
13 very well from what I understand. Is he in
14 the peas? He lives with the peas. Anyhow
15 Joan took a picture of Oliver, and I wanted to
16 share him with you.

17 And I wanted to talk about some
18 concepts behind organic agriculture being
19 about healthy soil and the dynamics of
20 biodiversity, of ecosystems and of how
21 earthworms like different materials.

22 So that really comes back to a

1 long historic precedent around how many
2 organic policy decisions were viewed back over
3 the years. And thinking like an earthworm is
4 a phrase that I've used personally for 30-
5 something years. And people go, what are you
6 talking about? All it really is is to say,
7 put yourself in the role of saying, well, what
8 would earthworms like? What would be better
9 for earthworms on this planet? And how can we
10 measure our ability to improve the system by
11 the number of earthworms we have encouraged --
12 number more earthworms.

13 So I think that is an interesting
14 principle behind decisions about organic
15 regulations.

16 With that in mind, actually, I
17 want to go back to our earthworm for a second,
18 because yesterday you heard quite a bit about
19 a range of topics. One of them was around
20 organic field seed, and there were some
21 questions about the potential decline in the
22 percentage of use in organic seed. And

1 actually I read some reports and looked at
2 some of the surveys, and conventional
3 untreated field seed now represents a slight
4 increase this year in the percentage of
5 acreage from completely uninspected
6 facilities. We don't even really know if they
7 are really untreated seed, because that is
8 very difficult to determine. There is no
9 inspection.

10 I mention that, because I think we
11 need to take a look at how all inputs are
12 reviewed, and there is a task force addressing
13 that within OTA. But it raises questions
14 about the whole process of exceptions,
15 exceptions being anything that isn't organic
16 in our system, whether it's on any of the
17 national lists.

18 So to the next slide, briefly I
19 want to summarize by saying, I as part of
20 continuous improvement we strongly encourage
21 you at this meeting to, one, remove lecithin
22 from 605; two, amend the lecithin listing on

1 606 to read de-oiled only; and longer term I'd
2 like to place three ideas out there for
3 further consideration.

4 One, the posting of all exceptions
5 that are granted by certifiers, so that we
6 understand what commercial availability
7 decisions are being made.

8 Right now we are doing it in the
9 opposite, we're saying you have to list
10 everything that is organic that is available.
11 We should be looking at the opposite, I think,
12 the exceptions.

13 Two, we continue to say, and we
14 said this in November, we believe that merging
15 605 and 606 and applying organic preference to
16 all materials would make a massive difference
17 in how the system is gamed by producers.

18 And finally, issue and enforce the
19 organic seed guidance.

20 Thank you.

21 CHAIR MOYER: Thank you, Bill.

22 And thank you for the mind bomb. Anybody have

1 any questions or comments for Bill? Joe.

2 MEMBER SMILLIE: Merging 605 and
3 606, could you just go into detail about how
4 it might solve the problems where we say we
5 have a no-win situation?

6 MR. WOLF: Well, we are spending
7 a lot of time in the debate about synthetic
8 versus non-synthetic and ag versus non-ag,
9 where to put it on the list. And instead we'd
10 be saying, okay, if it's not a clearly natural
11 material it needs to be -- if it is not -- in
12 the case of 605 and 606, if it's not certified
13 organic, and it's going to be in an organic
14 food product, then it has to be on this list,
15 and this list is complete, and if there is a
16 commercially available organic form of that
17 item, then it should be used instead. It
18 would be a much simpler process, and it would
19 solve your problem about yeast; it would solve
20 your problem about debating where to put
21 lecithin, et cetera.

22 It would be a rule change, but it

1 is one of the suggestions that the materials
2 working group presented in its report last
3 November, and we supported it in our comments.

4 MEMBER SMILLIE: Second follow
5 up, when you say certifiers have to declare
6 the exceptions, you mean all rulings on
7 commercial availability?

8 MR. WOLF: Yes, and I've
9 discussed this with a number of certifiers.
10 And I realize that that is a burden. But if
11 it were done in a structured and grouped way,
12 so that we understood the volume of decisions,
13 it would encourage production to fill in those
14 gaps, and it would make the whole system
15 accountable. The certifiers are agents of us,
16 of the USDA and of the people. And to know
17 what those decisions are rather than -- I'm
18 not talking who it was for, or the specifics
19 of which item it was or what field, but
20 generically.

21 MEMBER SMILLIE: But you don't
22 mean exceptions, you mean commercial

1 availability.

2 MR. WOLF: Commercial available -
3 - I'm calling it exceptions to being organic.
4 Anything that is commercial, not organic that
5 you made a decision, it's okay to use that.

6 CHAIR MOYER: Thank you very
7 much, Bill. Kelly, and then Dave Rogers on
8 deck.

9 MS. SCHEA: Kelly Schea with
10 White Way Foods. I'll make a deal with you
11 all, in the interests of time. If you will
12 read the comments I submitted to regulations
13 dot gov, I will be really really brief right
14 now. Is that a deal?

15 Okay, so I submitted comments
16 about sunset materials, and specifically
17 listed the sunset materials that we would like
18 to stay on the list.

19 As well I submitted comments to
20 the policy development committee on their
21 priority of petitions, specifically asking you
22 to remember that the secretary can develop

1 emergency procedures, and that should be your
2 number one priority, because that is only a
3 12-month exception, right. And secondly,
4 where issues like livestock health care items
5 come up like this issue about vitamins and
6 minerals, that should be a top priority.

7 So I do understand that it was
8 just a prioritization guideline, but I'd like
9 you to take that into account.

10 The livestock committee did put
11 forward the proposed recommendation for
12 vitamins and minerals that might be given to
13 animals either intramuscular or
14 subcutaneously, and I really want you to
15 remember that before OFPA, since OFPA, since
16 the regulations. This is happening every
17 single day on farms. It's widely accepted.
18 It's on certifiers' websites as something
19 farmers are allowed to do. Extension agents,
20 veterinarians and consultants all recommend
21 this. So there needs to be a mechanism, and
22 I'm staring down at you, Richard Matthews,

1 needs to be a mechanism for making sure that
2 this continues to be allowed as you go through
3 and do your work, okay, that is very
4 important.

5 And it also should be a category.
6 Do not start reviewing and TAP reviewing every
7 single vitamin and mineral that is already
8 allowed to go in the mouth of a cow just
9 because it is going to be injected in them for
10 herd health purposes.

11 And lastly, I just really want to
12 give a friendly reminder to the Board that
13 your raison d'etre, so to speak, your number
14 one responsibility, is materials. You have
15 been given statutory authority by Congress for
16 materials in organic. And so I think that the
17 community never wants to see the Board short
18 shift the amount of time they give to
19 discussing materials, the national list, how
20 that should be done, how that should be
21 organized, because that is your number one
22 responsibility and why you are sitting in

1 those chairs.

2 Okay? Thank you very much.

3 CHAIR MOYER: Question by Joe and
4 then Hugh.

5 MEMBER SMILLIE: Nice try, Kelly.

6 MS. SCHEA: What did I try? Ask
7 her how many minutes I shaved off for you all.

8 MEMBER SMILLIE: Well, you are
9 not going to get away that easily.

10 Speaking of materials you also
11 commented upon the lecithin issue. I just
12 want to know if the way we are going if you
13 could offer your comments on that.

14 MS. SCHEA: What I heard the
15 Board say, and what I heard the petitioner,
16 Mr. Clarkson, say is that not all forms of
17 lecithin are available, and he was mainly
18 focused on soy. He did say that the sunflower
19 product was not available. So as long as
20 whatever way you organize this that the liquid
21 sunflower lecithin that I commented about is
22 still available, then do it whatever way works

1 for you.

2 MEMBER SMILLIE: Is it de-oiled?

3 MS. SCHEA: Let me look here and
4 I'll tell you. It is -- I don't have anything
5 about de-oiled. All I know is it's liquid,
6 fluid, lecithin. I don't know. Okay, it's
7 not de-oiled then; I don't know.

8 CHAIR MOYER: Hugh.

9 MEMBER HEINZE: Just one thing,
10 Kelly, per the injectible vitamins and
11 minerals, it's not just subcu or IM, it's also
12 for IV use; it's any kind of injection.

13 MS. SCHEA: Yes. Well, the IV is
14 put in either subcu or IM, right? Okay, I'm
15 not a vet, and I'm not an R&D person.
16 Anything else for Kelly? Okay, thank you very
17 much.

18 CHAIR MOYER: Anything else?

19 Thank you, Kelly, appreciate your time.

20 Dave Rogers. Dave Rogers is not
21 here.

22 Harriet Behar.

1 MS. BEHAR: And I can get you
2 this in written form tomorrow after I print it
3 out.

4 I am Harriet Behar, and I will do
5 my best to channel Lynn Cody in her fervor for
6 quality systems and ISO accreditation.

7 First I want to clarify that there
8 are two parts to the accreditation puzzle.
9 The first is AHRQ which accredits organic
10 certifiers to ISO Guide 65.

11 They are now -- and they are now
12 in that process of being recognized by NIST
13 for doing that type of accreditation. This is
14 a terrific step forward.

15 The second is the accreditation of
16 national organic program itself by NIST. This
17 would include how they work with stakeholders,
18 the way policies and procedures are set, as
19 well as the transparency and consistency of
20 the implementation of those policies and
21 procedures as presented in their quality
22 manual. In order to have the accountability

1 and the continual improvement necessary for a
2 consistent program that implements the organic
3 regulation, it is important that the national
4 organic program itself in addition to AHRQ go
5 through the NIST recognition process.

6 Joe is right in that ANSI is the
7 U.S. rep to the ISO process, but NIST also
8 works very closely with the process. ANSI is
9 an accreditation body but not a recognition
10 body. Guess who oversees ANSI to make sure
11 that ANSI complies with ISO 17-01-11. It's
12 NIST. Okay? ANSI is recognized by NIST.

13 ANSI services would best be used
14 by the NOP if they wanted to hire a third
15 party to do an internal audit identifying what
16 is okay and where there are problems. ANSI
17 cannot grant recognition and would provide no
18 continual oversight of NOP's corrective
19 actions, timely input to implementation,
20 continued quality improvements. ANSI would
21 only come to audit NOP when NOP voluntarily
22 asks them to do so with no set timeline, no

1 follow up. They simply submit an audit report
2 to the NOP and that is that; NOP is not
3 required to do anything after an ANSI audit.

4 NIST provides the formal
5 recognition program which does provide that
6 regular oversight. And I will submit with my
7 comments all the things that NIST does, which
8 is quite a bit.

9 This recognition that they provide
10 is very important. This is what they are
11 looking for internationally.

12 So I just want to say in summary,
13 because I know everyone is tired, that it is
14 important that we look at having NIST do the
15 recognition of both AHRQ and the NOP, and that
16 if you want to use ANSI, that they would do
17 internal audits but not do the actual
18 oversight of the NOP. That should be done by
19 NIST. And Lynn offers that anyone can call
20 her at any time. If you need her phone number
21 it will be in the written comment. She is so
22 anxiously out there on the West Coast waiting.

1 So if you have any questions about
2 why we didn't agree with the inclusion of ANSI
3 as a choice between NIST and ANSI, I'm trying
4 to give you the difference there.

5 CHAIR MOYER: Thank you, Harriet,
6 I appreciate that.

7 Yes, sir.

8 MEMBER SMILLIE: Again, part of
9 the recommendation allows for NIST?

10 MS. BEHAR: Yes.

11 MEMBER SMILLIE: As far as ANSI
12 goes, it says it asks for a three-year cycle.
13 So yes, ANSI won't enforce. But we can put it
14 on a three-year cycle, just the same as NIST
15 is on a three-year cycle.

16 MS. BEHAR: Right, but ANSI will
17 not give you the recognition internationally
18 that NIST will.

19 MEMBER SMILLIE: My gut feeling
20 is that USDA, we need a good evaluation
21 program that is going to work, and I'm sure
22 NIST would work, and I think ANSI will work

1 too. And as far as recognition, I don't think
2 the USDA is really horribly worried about it
3 quite frankly.

4 CHAIR MOYER: Okay, thank you
5 very much, Harriet. The Board appreciates you
6 being here.

7 The Board would now recognize
8 Lindy Bannister.

9 MS. FRANCES: And Jeff, not to
10 forget Michael Christensen and Brian over on
11 the right, the sulfurous acid commenters.

12 CHAIR MOYER: I'm doing my best.

13 MS. BANNISTER: Thank you very
14 much.

15 I'm going to make it really quick.
16 I know that we started with FMI, talking from
17 a retailer's point of view. I'm the general
18 manager of the Wedge Coop in Minneapolis.
19 It's the largest single store coop in the
20 United States. We do about \$30 million out of
21 our retail business out of an 11,000 square
22 foot store. We have a warehouse that is

1 45,000 square feet. We do another \$10 million
2 out of that, and we have a 100-acre organic
3 farm.

4 All of our process is certified
5 organic. And from a retailer's point of view,
6 having that certification in our store is a
7 very long process. Our staff is very
8 involved. They spend hundreds of hours a year
9 making sure that what we put out is what we
10 say we are going to put out; that our
11 certification process is complete from the
12 time we bring the product from the farm to the
13 consumers' hand. It's not a point of
14 differentiation for us to be certified, it's
15 a point of pride.

16 And it's a point of pride that we
17 can take a producer, a manufacturer or a
18 grower's product from the time they hand it
19 over to our drivers, bring it to our
20 warehouse, bring it to our store, and we hand
21 it to the consumer.

22 So when we are talking about the

1 multi-site rule, and I know that you spoke
2 about it yesterday, certification for an
3 individual retail store should be a living,
4 breathing document that lives in the
5 departments in the store, and it cannot happen
6 in a conventional huge chain. I've worked in
7 conventional stores for 20 years before I got
8 to the world of coops. The chain of command
9 and the trickle-down effect does not work the
10 way it needs to work for certified organic.
11 Whatever you translate the word coming from
12 above, every manager translates that
13 differently, and the education is not
14 available in the conventional stores for the
15 staff or for the consumers to be able to get
16 the whole word about what organics is.

17 And I really urge you when we are
18 talking about certification for retailers,
19 that you really look at that process. Thank
20 you very much for listening.

21 CHAIR MOYER: Thank you, Linda,
22 we appreciate those comments. Any questions

1 for Lindy from members of the Board? Or
2 comments?

3 Thank you. We appreciate your
4 comments and being brief.

5 Okay, finally, Michael Christensen
6 or Brian Sakuma or both of you if whoever --

7 MR. CHRISTENSEN: Good evening.
8 Thanks for squeezing me in here. And I
9 appreciate your efforts in putting in these
10 long days in the name of organic agriculture.
11 So I too will be brief.

12 CHAIR MOYER: Could you identify
13 yourself for the record?

14 MR. CHRISTENSEN: I'm sorry,
15 Michael Christensen, I work for Reiter
16 Affiliated Companies. We're based in
17 California, and we grow about 1,000 acres of
18 organic berries, and then several thousand
19 more acres non-organic.

20 I'm here in support of the
21 addition of the sulfurous acid to the
22 materials list. In the -- our growing in

1 California, we are semi-arid, we have some
2 water quality issues there that aren't very
3 favorable for growing berries as far as pH,
4 and this sulfurous acid could help us do a
5 better job applying fertilizers and being more
6 efficient users of these amendments when we
7 get this soil pH into the right range of 6.5
8 to 7.0, then the fertilizers become more
9 available to the plant, and we can use less of
10 them, and be better stewards of the soil
11 through the use of that.

12 And let's see, what else? This
13 also should help us with our efficient use of
14 water. The sulfurous acid will help in the
15 maintenance of the drip irrigation systems.
16 And when those are maintained well and they
17 provide uniform application, then we should be
18 able to use less water and be more efficient
19 with it.

20 I will leave it at that. I
21 appreciate the time late in the day. Thank
22 you.

1 CHAIR MOYER: Michael, we
2 appreciate you taking the time to come all
3 this way and be as patient as you have been to
4 present your information to us.

5 Steve.

6 MEMBER DeMURI: As an actual
7 grower, what would prevent you from using
8 citric acid for the same use?

9 MR. CHRISTENSEN: We do use it on
10 a small scale. From what I understand it's
11 largely a matter of practicality, because it
12 was mentioned earlier about the volumes
13 required to make a substantial change in the
14 pH, or more than negligible change in the pH.

15 We did a quick survey of our
16 organic growers, and we are using citric acid
17 on, say, less than 10 percent of our organic
18 acres right now. And when we ask our entire
19 group of growing management how many would use
20 it, it went up to something like 800 of the
21 1,000 acres. So everybody wants to be able to
22 use pH adjustment to be a better fertilizer

1 user. That citric acid tool just isn't there
2 from a practical standpoint.

3 CHAIR MOYER: Thank you, Michael.
4 This Board always appreciates farmer comments
5 above and beyond many others. And we
6 appreciate your time and effort to come out
7 here. We know it's a hardship.

8 Any other business before the
9 Board before we adjourn for the evening?

10 Then we are adjourned, and we will
11 meet out front. Taxi cabs will leave for the
12 Witten Building exactly at 7:00. Please don't
13 be late.

14 (Whereupon at 6:38 p.m. the
15 proceeding in the above-entitled
16 matter was adjourned.)

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