Peer Review Report

Background:

- 7 CFR 205.509 requires Administrator to establish a Peer Review Panel to annually review NOP adherence to accreditation procedures.
- NOP contracted with American National standards Institute (ANSI) in 2005 and 2014, and with National Institute of Standards and Technology (NIST) in 2010.
- Foreign governments have also conducted Peer Reviews of the NOP: EU in 2010 & 2014; Canadian FIA in 2011 and 2013; Korea in 2014.

- NOSB made recommendations to the NOP on peer review in 2001, 2005 and 2009.
- In 2010 OIG found that using third party organizations to conduct peer review did not satisfy 205.509
- NOP in 2014 asked NOSB for recommendation to establish a repeatable and transparent process.
- CACS sought public comment, and provided a recommendation to NOP in April 2015
- 2016 NOP established Peer Review Panel and contracted with ANSI

Panel Members

- **Robert (Bob) Miller PE**– ANSI/ANAB Lead Assessor, ISO/IEC 17011, 17020, 17025 and 17065.
- **Jean Richardson Ph.D**., Professor Emerita, University of Vermont, Environmental Law and Environmental Studies; Independent Organic Inspector; NOSB (2012-2017) - Chair 2014-2015 and NOSB Certification and Accreditation Subcommittee 2012- 2017.
- **James Riddle**, Organic Independents LLP; Founding President, International Organic Inspectors Association; ISO training; Former board member, International Organic Accreditation Service; and Former chair, National Organic Standards Board.
- **Susan Ranck**, IOIA trained organic inspector, IFT Certified Food Scientist, ANSI technical assessor.
- **Elizabeth Okutuga**, Program Coordinate ANSI staff, ISO/IEC 17011 process knowledge and project coordinator.
- **Reinaldo Balbino Figueiredo**, Senior Program Director, ANSI staff, ISO/IEC 17011 evaluator. Contract/Project Manager.

Methodology

- Panel meetings by conference call and face to face over period May-August 2016
- Selection of Certifier files to Review
- Detailed Review of files selected
- Detailed analysis of all NOP Documents, site evaluation reports, policies and procedures which are referenced and used in Accreditation process.
- Lead Auditor prepared ISO /IEC 17011 analysis
- Preparation of Individual Reports
- Critical Review of each other's analyses,
- September 2016 Lead Auditor Report and all individual reports to NOP

- The findings will be considered part of the NOP quality management system and corrective actions will be made as necessary and appropriate.
- Findings will be presented to NOSB

2016 Peer Review Panel Presentation
for
United States Department of Agriculture
Agricultural Marketing Service

National Organic Program- Peer Review

Prepared by ANSI Lead Evaluator

USDA-AG6395S150169-2016NOSB-Rev00

ANSI
American National Standards Institute

Scope:



Procedure outlined in NOP 1031 (5/12/16), Peer Review of National Organic Program (NOP) and instructions from Miles McEvoy dated 5/19/2016.

The panel was tasked with the following:

- evaluate the NOP's polices processes and procedures for conformance to NOP regulations and ISO/IEC 17011,
- review implementation of certification body accreditation processes through selected file review of five files and
- reporting the peer review panel findings to the NOP Deputy Administrator and the National Organic Standards Board.

Key Findings



- NOP and its staff are in general compliance with ISO/IEC 17011
- Opportunities for Improvement
  - The accreditation body's procedures lack clarity to verify that the auditors are reviewing the regulatory status of ingredients and processing aids.
  - During file review an isolated instance of the NOP not following NOP 2000 for notification to certification body of a suspension was observed.
  - Consistent accreditation records are not being used and retained in order for the NOP to be in full compliance with 205.502

Key Findings Continued



- NOP 2005-4 Witness Audit Checklist is not complete. The NOP 2005 procedure does not provide the control needed to approve the document for adequacy prior to use.
- The accreditation body does not ensure there is immediate notification to the NOP for potential changes by certified bodies that may affect compliance.
- The accreditation body is required to ensure a balanced representation of interested parties with no single party predominating. Balanced representation of interested parties is not described for Accreditation Committee, NOP 2012 clause 2 qualifications

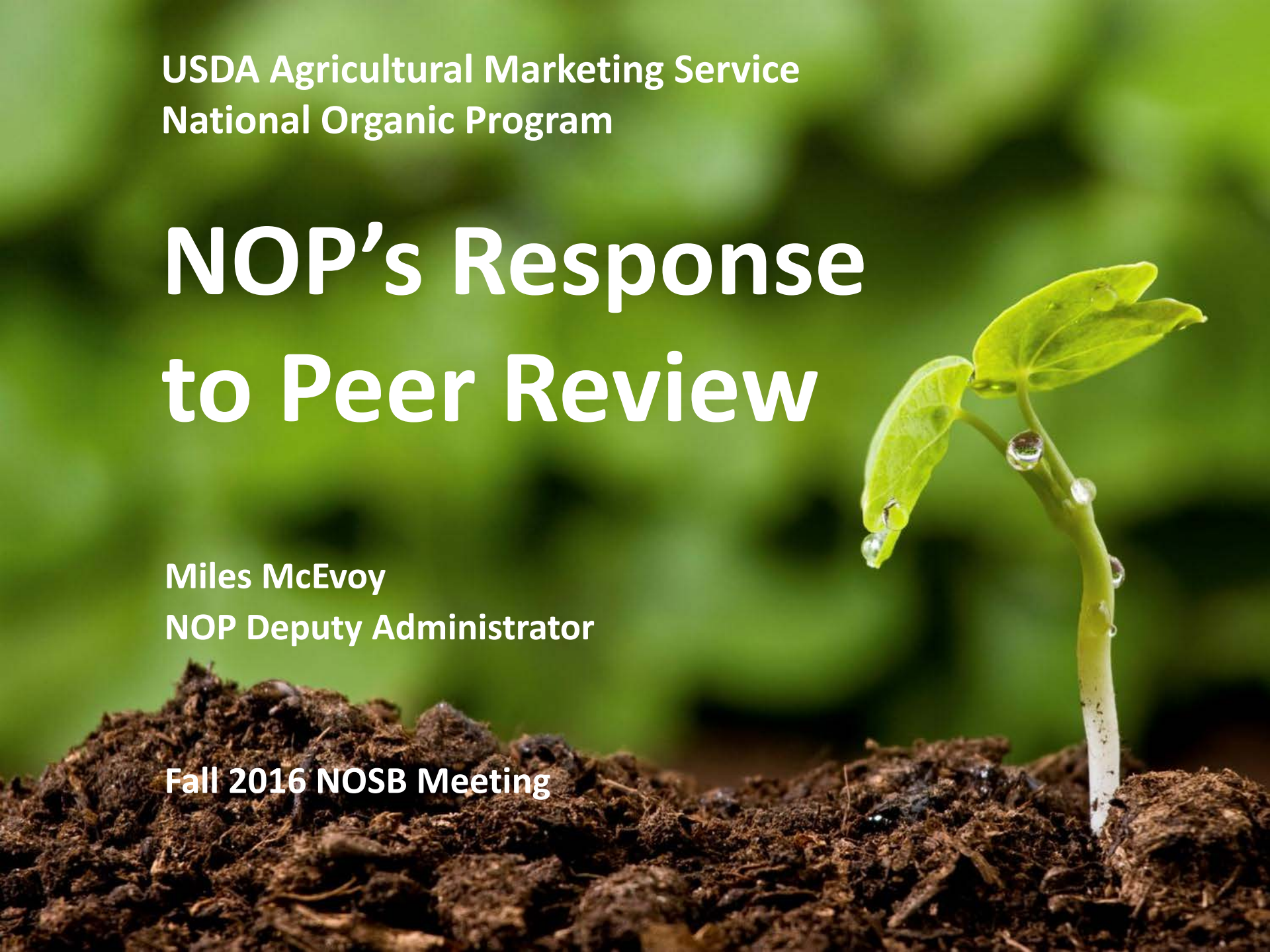
Key Findings Continued



- ISO/IEC 17011, Clause 4.3.2 requires the Accreditation Body to document the relationship with related bodies and identify potential conflicts of interest. Where conflicts are identified, appropriate action shall be taken; however, the procedure does not identify the procedure to determine the appropriate action.
- ISO/IEC 17011, Clause 5.3 requires all documents to be controlled. Not all documents are adequately controlled.
- NOP indicates it has procedures for identification, collection, indexing, accessing, filing, storage, maintenance and disposal of its records, but specific procedures are not identified.
- ISO/IEC Guide 65 has been superseded by ISO/IEC 17065; however, some documents and procedures still refer to Guide 65.

USDA Agricultural Marketing Service
National Organic Program

NOP's Response to Peer Review



Miles McEvoy
NOP Deputy Administrator

Fall 2016 NOSB Meeting

Peer Review Process

- American National Standards Institute (ANSI); panel of 4 independent auditors
- Process driven by Memo to NOSB (November 2014): “Peer Review of NOP Accreditation”
- A vital component of NOP’s commitment to continuous improvement

Context for Peer Review

- NOP's goal is to align with ISO/IEC 17011, a quality standard that applies to accreditation bodies like NOP
- NOP is a small program serving a large and growing industry
- We have strong, robust accreditation procedures
- We have a skilled pool of auditors who receive ongoing training – several are new to NOP
- NOP provides annual training to certifiers
- Our tools include the regulations, checklists, guidelines, procedures, and the NOP Handbook

NOP's Corrective Actions

- Audit found that not all NOP documents are adequately controlled.
  - NOP is actively improving processes that will make it more consistent in how the team applies its accreditation procedures and checklists – this will avoid inconsistencies
  - NOP is inventorying where document controls are lacking, and in FY 2017 will implement a process improvement project for document management and control
  - In the FY 2017 audit season, NOP will make sure that all auditors consistently use the correct version of checklists
  - NOP recognizes the importance and value of records management – we have made significant progress, and will continue to improve in this area.

NOP's Corrective Actions

- NOP will update out-of-date references to quality standards. Example: replace ISO/IEC Guide 65 with ISO/IEC 17065.
- As government employees, NOP staff adhere to strict conflict of interest and ethics laws. These rules and any necessary enforcement steps are detailed in USDA Directives, but are not included in NOP's quality manual.
- NOP will continue to strictly follow all federal laws related to conflict of interest and ethics – this is part of our oath when we become Federal employees and civil servants.
- NOP will update its quality manual to explicitly document these existing requirements.

NOP's Corrective Actions

- In FY 2017, NOP will update its procedures to help auditors more clearly document how they perform ingredient and processing aid reviews when auditing certifiers
  - The review is being done – we need to document it better
- Certifiers need to notify the NOP when changes occur that could impact compliance. NOP will provide more examples to certifiers of when this applies.
  - Example: Certifier adds a satellite office

In Closing …

- NOP appreciates the constructive feedback from ANSI.
- NOP will continue to refine its records management practices, improve accreditation processes, and continue to regularly train auditors and certifiers.
- By further strengthening accreditation procedures, NOP continues to support the organic community and maintain organic integrity for all.

NOSB input regarding priorities for the 2017 NOP Work Plan
November 4, 2016

Each subcommittee was solicited for feedback on what priorities the NOP should focus on in their upcoming work plan. The following summarizes the feedback from each subcommittee:

Handling

1. Materials Classification Draft Guidance for both: Agricultural and Nonagricultural Materials & Synthetic/Non-synthetic Decision Trees.
2. Calculating percentages of Organic Ingredients
3. infant formula substances (NVM/accessory nutrients) that we the NOSB have already voted to prohibit and action has yet to be taken.

Crops

1. Classification of Materials Guidance is the most important priority.
2. Sodium nitrate - fixing the rule to match the NOSB decision (top priority)
3. Rotenone - adopt NOSB recommendation
4. EPA List 4 inerts annotation change (including moving forward with the work of the Inerts Working Group before existing NOSB members depart)
5. Apiculture standards on the Livestock list is important.

Livestock

1. Zinc Sulfate
2. Apiculture
3. Methionine Averaging
4. Origin of Livestock

Materials

1. Classification of Materials

CACS

1. Calculating Percentage Organic in Multi Ingredient Products

PDS

None

INSPECTOR EVALUATION

USDA Organic Regulations (7 CFR Part 205) § 205.501 General requirements for accreditation.

(a) A private or governmental entity accredited as a certifying agent under this subpart must: … (6) Conduct an annual performance evaluation of all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and implement measures to correct any deficiencies in certification services.

BACKGROUND:

- NOSB, 12/2/2011, after public comment, voted to “provide all inspectors with performance assessment and oversight: a. Witness audits by ACA to be conducted at a minimum every 300 inspections or 3 years whichever is less. Results must be documented. Witness audits may be conducted by certification management, senior inspectors or senior reviewers.”
- NOP, 8/2/2013 promulgated NOP 2027 requiring annual in-field inspections – revised March 2016:
  3 b. Field Evaluation (Inspectors only). Inspectors should be evaluated during an onsite inspection by a supervisor or peer (another inspector) at least annually. i. This field evaluation should be conducted at the certifying agent’s expense. ii. Certifiers may use the field evaluation of another accredited certifier. ….. iii. Certifiers may submit alternative proposals for field evaluation to their Accreditation Manager.

- In 2015 IOIA developed an evaluation form, recruited evaluators and in consultation with several certifiers, implemented a fee for service program.
- December 8, 2015 the NOP issued *NOP 2501 Evaluating Auditor Performance* (of NOP Auditors), which requires in-field evaluation every 3 years. “5.2b A Witness Appraisal shall be conducted at least once every 3 years.”
- GAP, SQF and similar entities require witness audits every 2-4 years

SO HOW IS IT WORKING?

- Public Comment from 7 certifiers, ACA, Consumer groups, IOIA, but not directly from inspectors or industry.
-
- BENEFITS:
- Certifiers no longer hire poor performing inspectors.
- Allows certifiers to identify where further training is needed
- Opened a broader dialogue between certification staff and inspectors
- Increases consistency between certifiers
- Increases oversight and accountability for inspectors

COSTS and CHALLENGES:

- Disincentive to hire contract inspectors to do a handful of inspections
- Disincentive to accept new clients, locally or in distant locations
- Very Expensive: costs per inspection range from $400-$2000 per inspection. Huge annual budget change for every certifier.
- Not sustainable
- Not cost effective: eg. Certifier with 70 inspectors who do 4,800 inspections a year @ 1-200 inspections per inspector.
- Logistically burdensome
- Cannot conduct international inspector evaluations
- Sharing files through unsecured e-mail servers places client confidentiality at risk

COSTS and CHALLENGES:

- Sharing evaluations between certifiers is inconsistent
- Confusion over terms: “Personnel Evaluation” versus “Witness Audit”.
- IOIA evaluation instrument is not designed with goal of improving inspector
- Places peer evaluator inspectors in difficult professional relationships with fellow inspectors and inconsistent evaluations.
- Increases time, cost and stress for clients and inspectors.
- If Certifiers adopt risk-based plans to conduct in-field witness audits of all inspectors over a period of 3 years how will overall consistency be obtained and maintained throughout the industry?

STEPS FORWARD:

- CACS will prepare a proposal to make recommendations to the NOP to revise and update NOP 2027 based on public comment

Carrageenan

NOSB November 2016

Sunset Review

Carrageenan

- Classification & Environmental Criteria
- Human Health
  - “Sensitivity”
- Alternatives
  - List by product
  - Reasons and comments
- Compatibility

Carrageenan – Classification

In the 2012 NOSB review, it was stated that we would wait to address classification until the Final Guidance on Classification of Materials is published. This is still our position.

Continued public comment indicates that there is more than one method used to extract and purify carrageenan and some methods may be synthetic while others are non-synthetic.

Carrageenan – Environmental Criteria

A separate Technical Report (TR) was commissioned to address the impacts on the environment of the production and harvest of all types of marine plants used in agriculture and processed food.

We have not yet been able to formulate any specific course of action from from the issues raised in that TR. Continued public comment on this subject indicates that most seaweed used for carrageenan production is farmed and not gathered from the wild. The farming practices appear to be in alignment with organic principles.

Carrageenan – Human Health 1

- In the first posting the Handling Subcommittee made the following statement: "We are troubled that the research showing inflammation and glucose intolerance is all from one research team and has not been replicated."
- We have examined most of the references that were provided as citations regarding the replication issue (in the first and second public comment period) and found that the claims of replication could not be substantiated.
- We also heard no substantiation for the claim that inflammation responses from this material are universal for all humans.
- Since one of the basic tenets of science is that experimental results should be able to be reproduced in different labs by different researchers, the Handling Subcommittee has concluded that there is not sufficient replicated evidence that carrageenan is harmful to human health for everyone.
- While carrageenan has been more extensively studied than the other synthetic and non-synthetic emulsifiers, there may be reason for concern that all emulsifiers can lead to inflammation and it is not a unique function of carrageenan.

Carrageenan – Human Health 2

- In the 2012 Sunset Review we received public comment from at least 7 individuals who described themselves as sensitive to carrageenan who experienced adverse effects that stopped when they removed carrageenan from their diet. In this batch of public comment we received dozens more of these experiences.
- Some of those who reported sensitivity also mentioned that they were also sensitive to other gum additives such as gellan and guar, as well as to all seaweeds.
- Epidemiological studies of this food sensitivity are not in the literature that was provided to us because it appears that it has not been studied.
- We acknowledge the very real concerns of those with food sensitivities.
- Carrageenan is required to be on food labels with a few exceptions. Therefore those wishing to avoid it have the ability to do so. We urge all organic food processors to fully disclose all their ingredients on the labels.

Carrageenan – Alternatives – 1

Food Product	Can be made without carrageenan?
Chocolate Milk	yes and no
Whipping and heavy cream	yes
"whipability" suffered.	
Protein shakes (with milk proteins)	no
Protein sediment cannot be shaken. Hydrolyzed proteins lack viscosity. Probiotic straws do not function properly with gellan gum because low survival.	
Yogurt, sour cream, and cottage cheese	no comments received.
sugar free spreads - gelling agent	yes and no
fruit fillings and puddings	No and yes
gummi bears	yes
Vegan marshmallows	no
Soy milk	Yes and no

Carrageenan – Alternatives – 2

Food Product	Can be made without carrageenan?
frozen soy dessert	no
controls ice crystal formation.	
Processed meats	yes and no
Carrageenan has been instrumental in allowing meat processors to lower sodium levels as well as remove some phosphates from products.	
non-dairy beverages (nut and grain milks)	yes and no
a complete match of other stabilizers for carrageenan never happens as the rheology developed by carrageenan and protein is so unique. where viscosity was the key functionality, the majority of reformulations had marginal acceptance at best.	
beer	no
processing aid; clarification of wort . Trace amounts or none remain in final product.	

Carrageenan – Alternatives – 3

Food Product	Can be made without carrageenan?
Adult Medical Supplements	no
Infant formula	no
infants cannot digest large protein molecules. It is essential that a quiescently stored product be resistant to settling or separation and appear thick but behave thin to go through a nipple or tube. key nutrients settle out of the solution and are no longer available to developing infants. Dry formula is not feasible in areas with polluted water.	
Capsules for supplements, vegetarian	no
carrageenan provides rigidity and structure in which organic supplements (both liquids and powders) are contained. Non-carrageenan substitutes for vegetarian capsules do not provide suitable capsule integrity and/or can impart an off taste that consumers notice before capsules are swallowed.	

Carrageenan – Alternatives – Comments 1

Carrageenan has a critically unique ability to deliver the optimal balance of important sensorial attributes and underlying product stability.

Carrageenan has a specific interaction with the casein micelle in dairy products, and also reacts with proteins in non-dairy products. This permits a very low usage level relative to gums such as xanthan, gellan, and guar. It is critical in beverages and foods to deliver a consistent dosage and even distribution of the nutrients within the formula.

Compared to formulations with carrageenan, alternative gums:
· Require significantly longer mixing times, thereby lowering throughput; · Present additional complexity in powder mixing and hydrating. (these are safety critical process steps.)

Both dairy/milk derived proteins and non-dairy plant based proteins will form irreversible gels if the contents are allowed to settle on the bottom. While these gels may be reversible early in the shelf life with vigorous shaking, this solution will not work later in the shelf life.

Carrageenan – Alternatives – Comments 2

The use of iota-carrageenan's thixotrophic rheology imparts particle suspension without with strong "gummy" texture of the proposed alternatives such as xanthan gum, guar gum, locust bean gum or starch.

The alternatives suggested by the Committee are not "more organic." These substances, in some cases, fall in the same regulatory classification, "nonagricultural (nonorganic) substances."

We are also not aware of any other substances that have been removed from the National List only because non-organic alternatives exist on the National List. A review of the statute and case law do not support that the NOSB's authority extends to removal of a substance due to the existence of non- organic alternatives that are also on the National List.

Carrageenan – Compatibility

? ?

9 Marine Algae listings

* Aquatic Plant Extracts: mostly from wild kelp, brown seaweeds
* Alginic acid: mostly from wild brown seaweeds
* Agar Agar: mostly red seaweeds, wild and cultivated
* Carrageenan: mostly red seaweeds, wild and cultivated
* Alginates: mostly from wild brown seaweeds
* Beta-carotene extract color from algae: from green seaweeds, cultivated
* Kelp: brown seaweeds, except fertilizers use “kelp” for all classes
* Seaweed, Pacific Kombu: typically cultivated Laminaria species
* Wakame Seaweed (Undaria pinnatifida): a cultivated and invasive kelp

Global Context

- Fast growing industry with overharvesting impact on marine ecosystems; need for ecosystem conservation.
- Expansion of seaweed cultivation
- Wild harvesting techniques
- Role of seaweeds in climate change
- Sequestration of metals or other contaminants in seaweeds

REQUEST FOR PUBLIC COMMENT

- Should the naming conventions of the marine plant/algae listings on the National List be consolidated and/or clarified to avoid redundancies and duplication, using Latin binomials?
- Should annotations be written to clarify specific uses, or harvesting guidelines for any of the marine algae listings, such as “no machine harvesting of *Ascophyllum*”, and “Not harvested from a conservation area identified by State, Federal or International bodies”?
- Is there a need for further NOP Guidance on marine plants/algae?

The National Organics Standards Board brings forward the following resolution:

The NOSB respects the efforts of the former NOSB that led to their 2010 recommendation on terrestrial plants in greenhouses.

The NOSB recognizes that the foundation of organic agriculture is based upon a systems approach to producing food in the natural environment, which respects the complex dynamic interaction between soil, water, air, sunlight, plants and animals needed to produce a thriving agro-ecosystem.

At the heart of the organic philosophy is the belief that our responsibilities of good stewardship go beyond production of healthy foods and include protection of natural resources, biodiversity and the ecosystem services upon which we all depend.

We encourage future NOSB to consider this wider perspective as the board undertakes the challenges of assessing and defining innovations in agriculture that may be compatible in a system of organic production.

In the case of the hydroponic/bioponic/aquaponic issue, it is the consensus of the current members of the NOSB to prohibit hydroponic systems that have an entirely water based substrate. Although that was the original intent of the proposal before us today, the current proposal as structured does not achieve this objective. While the NOSB does not believe that the liquid substrate systems should be sold under the USDA organic label, these growers deserve the chance to promote their very commendable qualities and objectives in their own right.


USDA
ORGANIC


USDA
BIOPONIC

Process Verified Program (USDA-AMS)

A user-feefunded, audit-based, third-party verification service designed to provide agricultural suppliers with labeling and marketing tools that assure customers of the consistent quality of the products or services they purchase.

“Must be made from organic soybeans. Soy wax made from nonorganic soybeans produced without excluded methods may be used when soy wax from organic soybeans is not commercially available.”

PPM Proposed Revisions – Fall 2016

…. In 132 slides

ADMINISTRATIVE TEAM

The Administrative Team consists of the Chair, Vice Chair, Secretary, and Designated Federal Official/Advisory Committee Specialist. . This group is responsible for coordinating logistics and operations of the Board. The Administrative team meets via teleconference ~~once or twice a month~~ on an as-needed basis, to be determined by the Administrative Team. This team is not a subcommittee, and makes no decisions. All items needing further discussion or action are placed on the Executive Subcommittee agenda and are recorded in the Executive Subcommittee notes.

- Recordkeeping

  Records of the NOSB shall be defined and handled in accordance with General Records Schedule ~~26, Item 2~~ 6.2 or other approved agency records disposition schedule. . This schedule is available online at: https://www.archives.gov/records-mgmt/grs/grs06-2.pdf. These records shall be available for public inspection and copying, subject to the Freedom of Information Act, 5 U.S.C. 552. Requests for records should be handling in accordance with the GSA March 14, 2000 memo that is available online here: http://www.gsa.gov/portal/content/100785. Information about the NOSB is available online at:
  http://www.ams.usda.gov/rules-regulations/organic/nosb

  While meeting transcripts are not required under FACA, the NOP provides transcripts or meeting notes to support the transparency of NOSB meetings and to support subsequent rulemaking activities. Minutes of each NOSB meeting, as approved by the DFO and the NOSB Chair and Secretary, shall contain a record of the persons present, documents provided to the board, a complete and accurate description of matters discussed and conclusions, and the outcome of voting. If not included in the minutes, a voting summary will be published that contains votes by member.

H. SUBSTANCE/MATERIALS REVIEW PROCESS

A primary function of the NOSB is "to assist in the development of standards for substances to be used in organic production" (OFPA 6518 (a)). "The Board shall develop the proposed National List or proposed amendments to the National List for submission to the Secretary …" (OFPA 6518(k)). The OFPA also establishes a petition process by which the public can request additions or deletions to the National List and also provides for a 5 –year "sunset" review by NOSB of all substances on the National List. The Materials Review Process is a collaborative effort between the NOP and NOSB. Some phases of the review process are handled exclusively by NOP and some by the NOSB.

The petition process is open to all. Petitions must be filed in accordance with the most recent Federal Register notice instructions
and NOP 3011, Procedure- National List Petition Guidelines, effective March 11, 2016.

In lieu of a formal Petition, a subcommittee (Livestock, Crops, Handling) of the NOSB may propose to remove a material from the National List by developing a Proposal for consideration by the whole Board, provided that all Criteria in OFPA at Section 6518(m) are documented as having been addressed in the Proposal. Procedures for such a petition will be the same as for changes to annotations or classification of materials as amended at H 2 in this PPM.~~(currently January 18, 2007 [72 FR 2167]).~~

2. **Changes to annotations or classification of materials or proposal to remove.**

The NOSB may request to review an existing substance on the National List without a new petition when they have justification to support a revision of the annotation or reclassification of the substance or removal of a substance. This may happen as a result of the sunset review process, or based on new information provided in a Technical Review, or from public comment. The following procedure should be followed:

- The Subcommittee sends a written request for a new work agenda item to the Executive Subcommittee.

V. Prioritization of Petitions

Petitions received and deemed eligible and sufficient by the NOP/NOSB will be prioritized as follows:

Priority 1: A petition or proposal to **remove** a material presently on the National list that raises serious health, environmental, or regulatory concerns, including petitions to reconsider previous decisions, will be given the highest priority - **Priority 1,** above all other petitions in the queue of the reviewing Subcommittee (Crops, Handling, or Livestock).

Priority 2: A petition or proposal to **remove** a material presently on the National list not based on serious health, environmental, or regulatory concerns, but based on other new information, such as commercial availability status, would be assigned a **Priority 2,** behind Priority 1 petitions, but above any petitions to list materials that are in the queue of the reviewing Subcommittee (Crops, Handling, or Livestock). This priority assignment would include any removal petitions requesting reconsideration of previous board decisions, if the resubmitted petition contains substantive new information to warrant reconsideration.

C. PARLIAMENTARY PROCEDURES

No procedures or business of the NOSB shall be taken in conflict with OFPA, FACA or other pertinent laws (herein referred to as governing legislation). For parliamentary procedure, all motions and votes not covered under the governing legislation shall be governed by this Policy and Procedure Manual if directly addressed. If procedures, motions and votes are not directly addressed in the Policy and Procedures Manual, they shall be governed by Robert's Rules of Order Newly Revised. The NOSB adopted the use of Robert's Rules of Order in March 1992, but modified its use as only a non-mandatory guide in May 1993. Roberts Rules may be adapted to meet the special requirements of a group. Because the NOSB is also subject to the OFPA, FACA and USDA, a designated NOP staff member may act as an informal Parliamentarian to advise the Chair.

Voting schedule

- Officers shall be elected for one-year terms by majority vote at the fall NOSB meeting.
- Newly elected officers will assume their positions at the conclusion of the fall NOSB meeting, and assume the responsibilities thereof at that time
- Outgoing NOSB officers will assist the incoming officers with the transition into their new roles, to be completed no later than January 23rd of the following year.

Counting of Votes

- Voting will be by secret ballot immediately following nominations for each office.
- Ballots for officers will be cast in the following order:
    1. Chair
    2. Vice Chair
    3. Secretary
- Ballots will be counted for one office and the Secretary will announce the tally before the next office is opened for nominations.
- The Secretary and Vice chair will prepare and distribute the ballots, then collect them after each vote.
- The Secretary will tally the votes ~~after each officer nomination~~ and the Chair will verify the results.
- The first nominee to receive a majority ~~candidate receiving the greatest number~~ of votes will be elected. If no nominee received the majority of votes, the nominee with the least votes will be eliminated and a revote will occur with the remaining candidates. This process will be repeated until a nominee obtains a majority.
- In the event of a tie there will be a revote until a nominee obtains a majority. All nominees will be included in the revote ~~or may be given the opportunity to withdraw at their discretion~~.
- Votes will remain confidential, and ballots will be disposed of by the Chair or Secretary.
- A nominee may withdraw at their discretion at any time.
- In the event of only one nominee for office, the vote may be by acclimation.

- Meeting notices and agendas must be published in the Federal Register to accommodate public participation. Although not required by FACA, the NOP strives to:

  - Post a provisional agenda on its web site no later than 90 days before the meeting is scheduled to begin
  - Post a final agenda, on its web site, no later than 45 days before the meeting is scheduled to begin
  - The NOP will strive to publish notice of the next NOSB meeting in the Federal Register as early after the previous NOSB meeting as possible. This notice will serve as an "open docket" in which public comment can be received by the NOP and NOSB. Notwithstanding the above, the NOP will ~~P~~publish notice of the meeting in the Federal Register no later than 45 days before the meeting is scheduled to begin

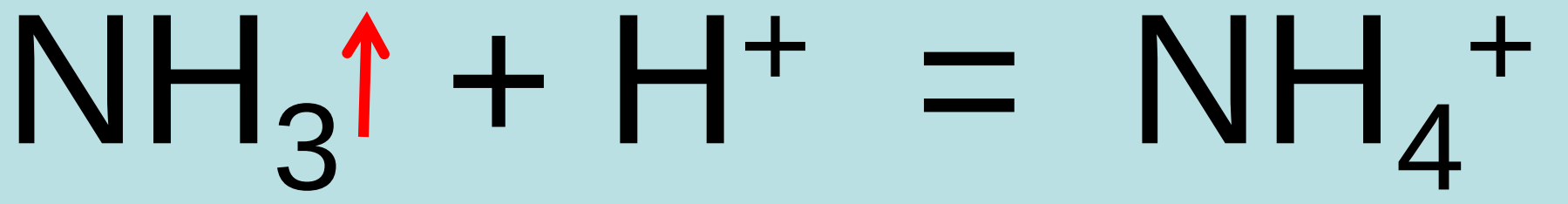
IX. REVISIONS TO THE POLICY AND PROCEDURES MANUAL

- The PDS will review the PPM each year and, working in collaboration with the NOP, determine if any updates are necessary.

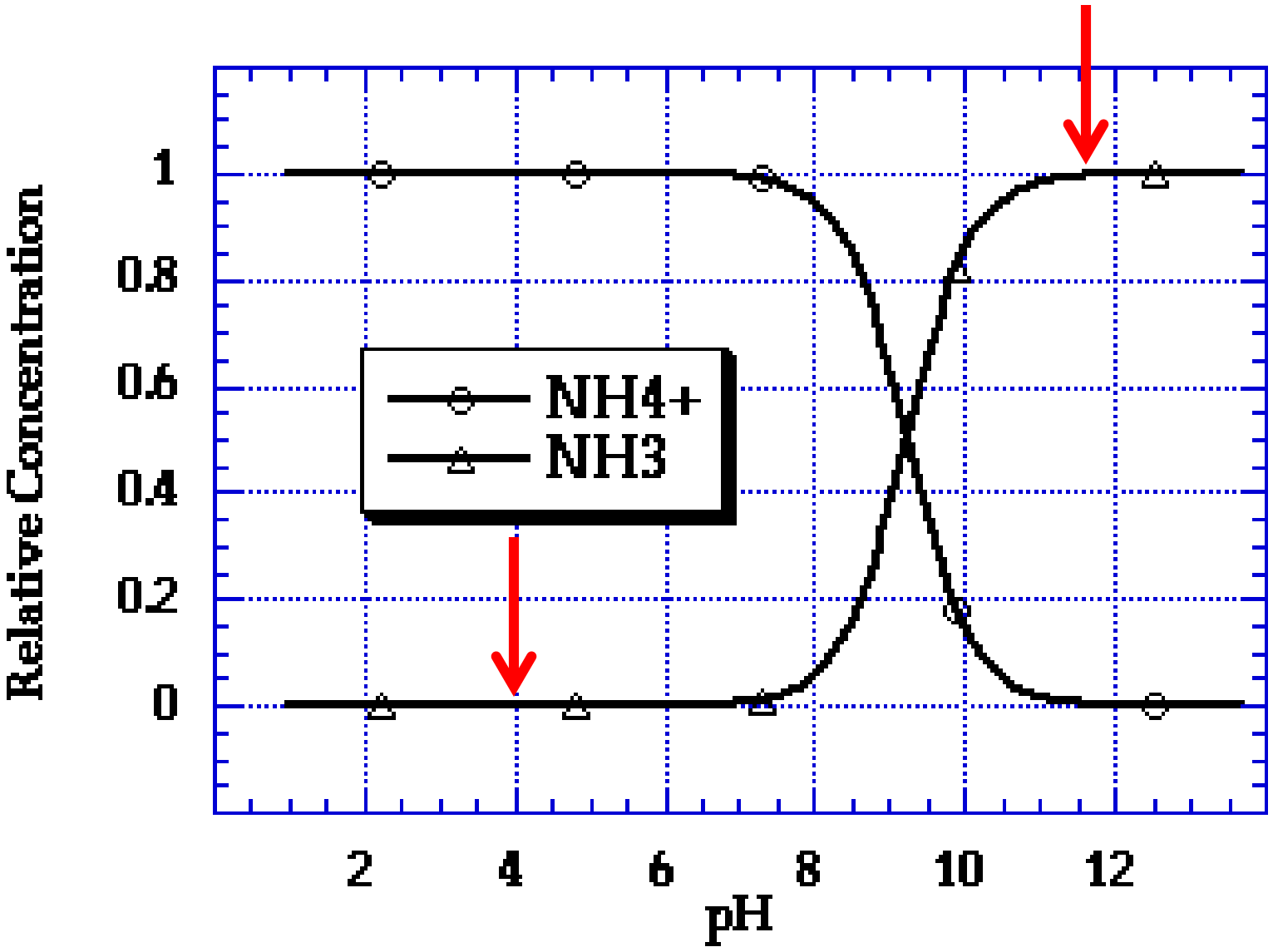
- Proposed changes will be subject to review and approval by the NOP and the full NOSB.

Other items raised

- Clarification of COI policy related to SGE vs Reps
- Mechanism by which the public can raise COI
- Ancillary substances as part of material review process (from executive subcommittee)



(Ammonia) (Acid) (Ammonium)


Relative Concentration
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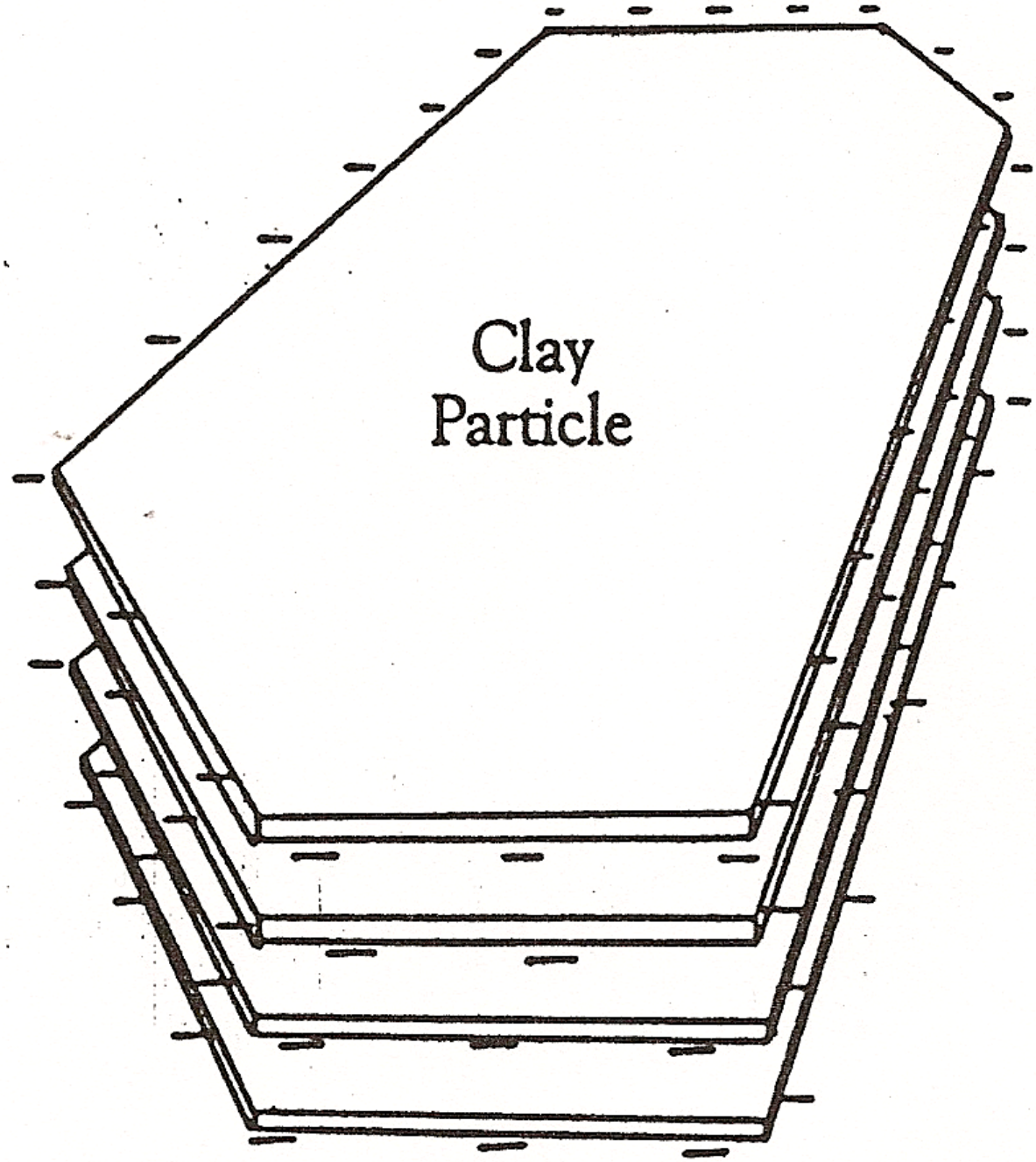
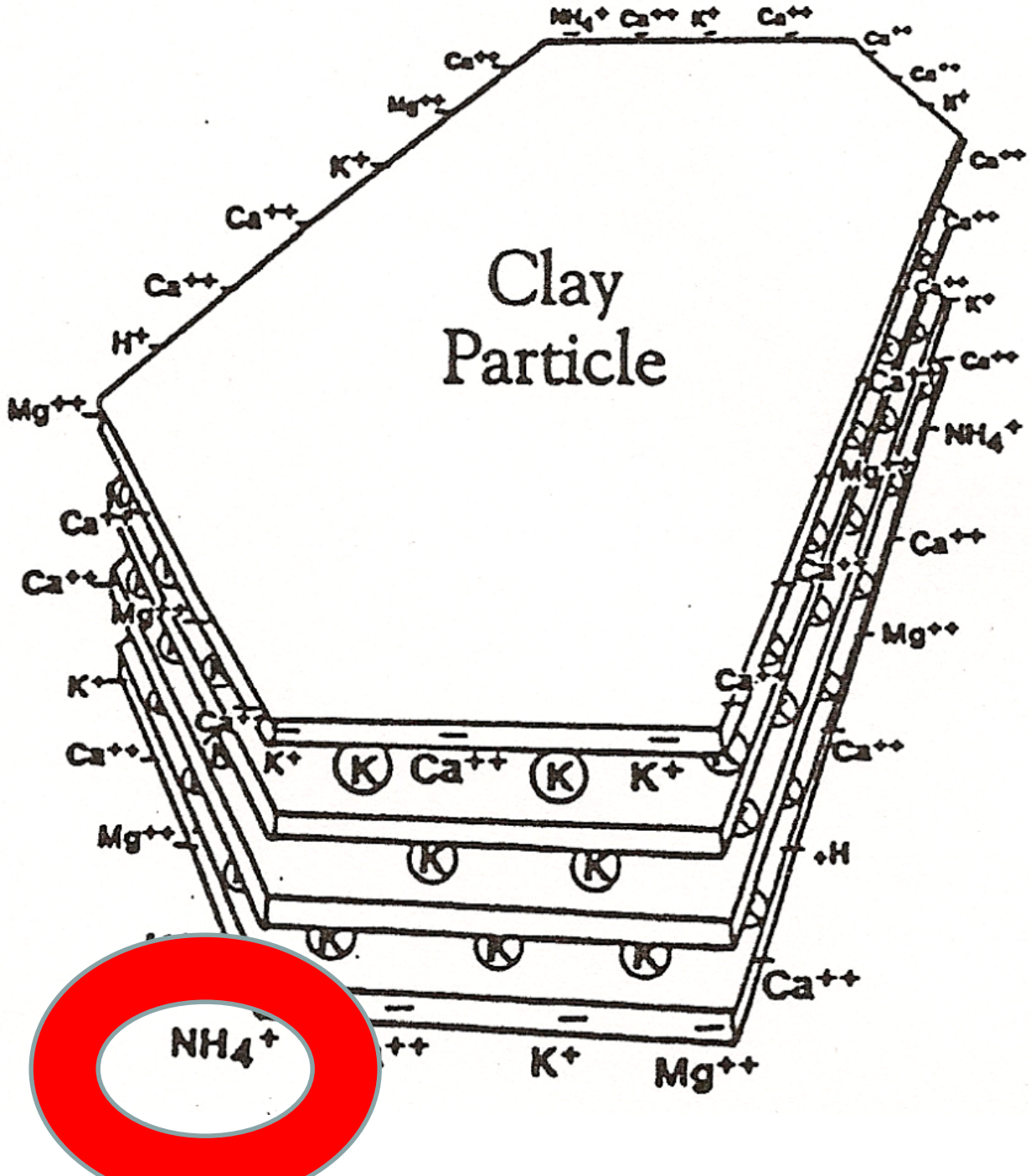
0.6
0.4
0.2
0
NH4+
NH3
2
4
6
8
10
12
pH


Clay
Particle


Clay
Particle
NH4+
Ca++
K+
Mg++
H+

Aluminum Sulfate

$Al_2(SO_4)_3$

Sodium Bisulfate

$NaHSO_4$

Acid Activated Bentonite

H_2SO_4 = Clay (adsorbs cations)

Activated Barn Fresh

- Citric Acid
- Montmorillonite (Clay particles)
- Diatomaceous Earth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FARM
We Grow what We Sell
Linden Road, Watsonville, CA
Certified Organic by CCOF
Organic
Newtown
Pippin
Organic
Fuji

May your hands always be busy
May your feet always be swift
May you have a strong foundation
When the winds of changes shift
May your heart always be joyful
May your song always be sung
May you stay forever young